



# Kings/Tulare HMIS

## Policies and Procedures

# Table of Contents

1. Introduction .....	3
2. Project Overview.....	4
3. Governing Principles .....	5
4. Participation Policy .....	6
5. Roles and Responsibilities.....	6
5. Operating Procedures.....	9
5.1 Project Participation .....	9
5.2 Use Requirements.....	10
5.3 Collection and Entry of Client Data.....	12
5.4 Release and Disclosure of Client Data .....	13
5.5 Workstation Security .....	14
5.6 Training .....	14
5.7 Compliance .....	15
5.8 Technical Support .....	15
5.9 Changes to This and Other Documents .....	16
6. Data Quality .....	17
6.1 Definition of Data Quality .....	17
6.2 Data Quality Issues and Standards .....	18
7. Other Obligations and Agreements .....	22
7.1 HUD HMIS Data and Technical Standards .....	22
7.2 HIPAA .....	22
8. Forms Control .....	22
Appendix A: Universal and Program Specific Data Elements and Federal Partner Grant Program Overview Interactive Tool.....	22
Appendix B: Standard Performance Measures.....	23

## Revision History

Revision #	Revision Date	Revision Description
1	11/6/2023	3. Governing Principals – Compliance ADDED An additional investigation may be conducted internally by your agency of employment on all violations or potential violations, as deemed necessary.
2	11/6/2023	5.4 Release and Disclosure of Client Data - Procedures ADDED or 15 calendar days if the Agency is a Health Care Provider
3	11/6/2023	7.2 HIPPA ADDED and California State Law

# 1. Introduction

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

Operating Procedures provides specific policies and steps necessary to control the operational environment and enforce compliance in:

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

## 2. Project Overview

The long-term vision of KTHMIS is to enhance Partner Agencies' collaboration, service delivery and data collection capabilities. Accurate information will put the Kings/Tulare Homeless Alliance (Alliance), which serves as the local Continuum of Care on Homelessness, in a better position to request funding from various sources and help plan better for future needs.

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

The fundamental goal of KTHMIS is to document the demographics of homelessness in Kings and Tulare counties according to the HUD HMIS Standards. It is then the goal of the project to identify patterns in the utilization of assistance, and document the effectiveness of the services for the client. This will be accomplished through analysis of data that is gathered from the actual experiences of homeless persons and the service providers who assist them in shelters and homeless assistance programs throughout the two counties. Data that is gathered via intake interviews and program participation will be used to complete HUD Annual Progress Reports. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, service providers, advocates, and consumer representatives.

The project utilizes a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the two counties. 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.

KTHMIS is staffed and advised by Kings/Tulare Homeless Alliance and Kings United Way (Alliance/KUW). Kings United Way's Executive Director is the authorizing agent for all agreements made between Partner Agencies and KTHMIS. The KTHMIS Specialist is responsible for the administration of the central server and user access. KTHMIS Project Staff will also provide technology, training and technical assistance to users of the system throughout the two counties.

The HMIS Committee of the Alliance is responsible for oversight and guidance of KTHMIS. This group is

committed to balancing the interests and needs of all stakeholders involved: homeless men, women, and children; service providers; and policy makers.

Potential benefits for homeless men, women, and children and case managers: Service coordination can be improved 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.

Potential benefits for agencies and program managers: Aggregated, information can be used to develop a more complete understanding of clients' needs and outcomes, and then used to advocate for additional resources, complete grant applications, conduct evaluations of program services, and report to funding agencies such as HUD.

Potential benefits for Alliance and policy makers: Countywide involvement in the project provides the capacity to generate HUD Annual Progress Reports for the Alliance and allows access to aggregate information both at the local and regional level that will assist in identification of gaps in services, as well as the completion of other service reports used to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

### 3. Governing Principles

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

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

#### **Confidentiality**

**The rights and privileges of clients are crucial to the success of KTHMIS.** These policies will ensure clients' privacy without impacting the delivery of services, which is the primary focus of agency 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 KTHMIS will only be permitted by the procedures set forth in this document.

All participants have the right to file formal grievances if they feel their rights have been violated. If there is a grievance regarding the KTHMIS and efforts to resolve it directly have not been successful, participants have the right to submit a letter in writing describing the issue. Agencies will report all written client grievances concerning the KTHMIS to the HMIS Committee.

#### **Data Integrity**

Client data is the most valuable and sensitive asset of KTHMIS. 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 countywide aggregation of unduplicated homeless statistics. The HMIS Coordinator is responsible for ensuring the broadest deployment and availability for homeless service agencies in Kings and Tulare counties.

## **Compliance**

Violation of the policies and procedures set forth in this document will have serious consequences. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity will result in the withdrawal of system access for the offending entity. An additional investigation may be conducted internally by your agency of employment on all violations or potential violations, as deemed necessary.

## **4. Participation Policy**

### **Responsibilities**

Beginning with the 2003 Continuum of Care (CoC) and Emergency Shelter Grants (ESG) and continuing with the Homeless Prevention and Rapid Re-housing Program (HPRP), the United States Department of Housing and Urban Development (HUD) requires all grantees and sub-grantees to participate in their local Homeless Management Information System (HMIS). This policy is consistent with the Congressional Direction for communities to provide data to HUD on the extent and nature of homelessness and the effectiveness of its service delivery system in preventing and ending homelessness. The HMIS and its operating policies and procedures are structured to comply with the most recently released HUD Data and Technical Standards for HMIS. Recognizing that the Health Insurance Portability and Accountability Act (HIPAA) and other Federal, State and local laws may further regulate agencies, the KT-HMIS may negotiate its procedures and/or execute appropriate business agreements with Partner Agencies so they are in compliance with applicable laws.

### **Mandated Participation**

All designated agencies that are funded to provide homeless services through the Housing and Community Development Department of the State of California (HCD) and/or HUD must meet the minimum HMIS participation standards as defined by this Policy and Procedures manual. These participating agencies will be required to comply with all applicable operating procedures and must agree to execute and comply with an HMIS Agency Participation Agreement.

### **Voluntary Participation**

Although non-funded agencies are only required to meet minimum participation standards, KTHMIS and the Homeless Alliance strongly encourages non-funded agencies to fully participate in the HMIS.

While the Alliance cannot require non-funded providers to participate in the HMIS, the Alliance works closely with non-funded agencies to articulate the benefits of the HMIS and to strongly encourage their participation in order to achieve a comprehensive and accurate understanding of homelessness in Kings and Tulare Counties.

## **5. Roles and Responsibilities**

### **Kings/Tulare Homeless Alliance (Alliance)**

#### **HMIS Committee**

- Project Direction and Guidance
- Technology Plan
- Selection of System Software
- Approval of Project Forms and Documentation
- Project Participation and Feedback
- Project Funding
- Adherence to HUD Data Standards

### **Kings United Way Executive Director**

- Liaison with HUD
- Project Staffing
- Signatory Agent for Agency Agreements
- Adherence to HUD Data Standards
- System Backup and Disaster Recovery Plan

### **HMIS Specialist**

- Creation of Project Forms and Documentation
- Project Website
- Project Policies and Procedures and Compliance
- General Responsibility for Project Rollout
- Curriculum Development
- Training Timetable
- Training Documentation
- Confidentiality Training
- Outreach
- Adherence to HUD Data Standards
  
- Keeper of Signed Agency Agreements
- User Administration
- Add and Remove Partner Agency Site Administrators
- Manage User Licenses
- Ongoing Protection of Confidential Data
- Implementation and ongoing Training for Agency Site Administrators and End Users
- End User Support
- Helpdesk
- Adherence to HUD Data Standards
- System Customization
- Data Monitoring
- Data Validity
- Aggregate Data Reporting and Extraction
- Assist Partner Agencies with Agency-Specific Data Collection and Reporting Needs (Within Reason and Within Constraints of Other Duties)

### **Partner Agency (PA)**

#### **Partner Agency Executive Director**

- Authorizing Agent for Partner Agreement (Agency Agreement)
- Designation of Site Administrator
- Agency Compliance with Policies & Procedures
- End User Licenses
- Agency Level HUD Reporting
- Each Partner Agency is responsible for ensuring they meet the Privacy and Security requirements as detailed in the HUD HMIS Data and Technical Standards
- Annually, conduct a thorough review of internal policies and procedures regarding HMIS
- Adherence to HUD Data Standards

**Partner Agency Site Administrator**

- Authorizing agent for Partner Agency User Agreements
- Keeper of Partner Agency User Agreements
- Keeper of executed Client Informed Consent Forms
- Point of contact for HMIS related matters
- Maintains staff workstations
- Internet connectivity
- End User adherence to Workstation Security Policies
- Detecting and responding to violations of the Policies And Procedures
- First level end user support
- Maintain Agency/Program Data In KTHMIS application
- Adherence to HUD Data Standards

**Agency Staff**

- Safeguard client privacy through compliance with Confidentiality Policies
- Data collection as specified by training and other documentation
- Adherence to HUD Data Standards



## 5. Operating Procedures

### 5.1 Project Participation

#### Policies

Agencies participating in KTHMIS shall commit to abide by the governing principles of KTHMIS and adhere to the terms and conditions of this partnership as detailed in the Agency Agreement.

#### Procedures

##### **Confirm Participation**

1. The Partner Agency shall confirm their participation in KTHMIS by submitting an executed Agency Agreement to the KTHMIS Specialist.
2. The KTHMIS Specialist will obtain the co-signature of Kings United Way Executive Director.
3. The KTHMIS Specialist will maintain a file of all signed Agency Agreements.
4. The KTHMIS Specialist will update the list of all Partner Agencies and make it available to the project community and post this list on the KTHMIS website ([www.kthomelessalliance.org](http://www.kthomelessalliance.org)).
5. All Partner Agencies will be listed on the KTHMIS website.

##### **Terminate Participation**

###### **Voluntary**

1. The Partner Agency shall inform the KTHMIS Specialist in writing of their intention to terminate their agreement to participate in KTHMIS.
2. The KTHMIS Specialist will inform the Kings United Way Executive Director and update the Participating Agency List.
3. The KTHMIS Specialist will revoke access of the Partner Agency staff to KTHMIS. Note: All Partner Agency-specific information contained in the KTHMIS system will remain in the KTHMIS system.
4. The KTHMIS Specialist will keep all termination records on file with the associated Agency Agreement.

###### **Lack of Compliance**

1. When the KTHMIS Specialist determines that a Partner Agency is in violation of the terms of the partnership, Executive Directors of Partner Agency and Kings United Way will work to resolve the conflict(s).
2. If Executive Directors are unable to resolve conflict(s), the CoC President will be called upon to resolve the conflict. If that results in a ruling of Termination:
  - a) The Partner Agency will be notified in writing of the intention to terminate their participation in KTHMIS.
  - b) The KTHMIS Specialist will revoke access of the Partner Agency staff to KTHMIS.
  - c) The KTHMIS Specialist will keep all termination records.

##### **Assign Site Administrator**

1. The Partner Agency shall designate a primary contact for communications regarding KTHMIS by submitting a Partner Agency Site Administrator Agreement form to the KTHMIS Specialist.
2. The KTHMIS Specialist will obtain all signatures necessary to execute the Partner Agency Site

Administrator Agreement.

3. The KTHMIS Specialist will maintain a file of all signed Site Administrator Assignment forms.
4. The KTHMIS Specialist will maintain a list of all assigned Partner Agency Site Administrators and make it available upon request.

#### **Re-Assign Site Administrator**

1. The Partner Agency may designate a new or replacement primary contact in the same manner as above.

#### **Site Security Assessment**

1. Prior to allowing access to KTHMIS, the Partner Agency Site Administrator and the KTHMIS Specialist will meet to review and assess the security measures in place to protect client data.
2. The Partner Agency Executive Director (or designee) and Partner Agency Site Administrator will meet with a KTHMIS staff member to assess the Partner Agency information security protocols. This review shall in no way reduce the responsibility for Partner Agency information security, which is the full and complete responsibility of the Partner Agency, its Executive Director, and Site Administrator.
3. Partner Agencies shall have virus protection software on all computers that access KTHMIS.

## **5.2 Use Requirements**

### **Policies**

- KTHMIS recognizes the sensitivity of the data in the HMIS and therefore requires that the individuals responsible for managing the HMIS be subject to criminal background checks and that each end user be adequately trained in security measures, appropriate to his or her access level. It is the responsibility of the KTHMIS administrator to provide this training.
- Partner Agencies will follow their own policies regarding background checks and hiring individuals with criminal justice histories, as long as they comply with all relevant laws. Partner Agencies that choose to allow individuals without conducting background checks or allow individuals with criminal histories related to identity theft or fraud to access KTHMIS data will assume all liabilities resulting from those actions.
- Partner Agency staff participating in KTHMIS shall commit to abide by the Governing principles of KTHMIS and adhere to the terms and conditions of the Partner Agency User Agreement.
- The Partner Agency Site Administrator must only request user access to KTHMIS for those staff members that require access to perform their job duties.
- All users must have their own unique user ID and should never use or allow use of a user ID that is not assigned to them [see Partner Agency User Agreement].
- Temporary, first time only, passwords will be communicated via email to the owner of the user ID.
- User-specified passwords should never be shared and should never be communicated in any format.
- New user IDs must require password change on first use.
- Passwords must consist of at least 8 characters and must contain a combination of letters, numbers, and a special character. The password must contain at least one capital letter [required by software]. According to the HUD Data and Technical Standards Final Notice (July 2004).
- For Partner Agency Site Administrators and Users, passwords may only be reset by the KTHMIS support staff, unless user has previously set up recovery information by adding a security question.

## Procedures

### **Criminal Background Verification**

1. The HMIS Security Officer and any user (employed or engaged by KTHMIS) able to access KTHMIS regional HMIS data will undergo criminal background verification. Records of the completed background checks (though not the results) are subject to inspection by the Alliance.
2. The KTHMIS Lead will follow their own policies regarding hiring individuals with criminal justice histories, as long as they comply with all relevant laws. The KTHMIS Lead will not hire individuals whose background checks reveal criminal histories related to identity theft or fraud. The KTHMIS Lead will manage the results of any background checks conducted on a case-by-case basis.
3. Partner Agencies will follow their own policies regarding background checks and hiring individuals (including volunteers) with criminal justice histories, as long as they comply with all relevant laws. Partner Agencies that choose to allow individuals without conducting background checks or allow individuals with criminal histories related to identity theft or fraud to access KTHMIS data will assume all liabilities resulting from those actions.

### **Workstation Security Assessment**

1. Prior to requesting user access for any staff member, the Partner Agency Site Administrator will assess the operational security of the user's workspace.
2. Partner Agency Site Administrator will confirm that workstation has virus protection properly installed and that a full-system scan has been performed within the last week.
3. Partner Agency Site Administrator will confirm that workstation has and uses a hardware or software firewall.

### **Request New User ID**

1. When the Partner Agency Site Administrator identifies a staff member that requires access to KTHMIS, a Partner Agency End User Agreement (PAEUA) will be provided to the prospective user.
2. The prospective user must read, understand and sign the PAEUA and return it to the Partner Agency Site Administrator.
3. The Partner Agency Site Administrator will obtain the Executive Director's signature and forward to the KTHMIS Specialist. The Partner Agency Site Administrator will keep a copy on file.
4. The KTHMIS Specialist will create the new user ID as specified and notify the user ID owner of the temporary password via email.

### **Change User Access**

When the Partner Agency Site Administrator determines that it is necessary to change a user's access level, the Partner Agency Site Administrator will request this change via e-mail to the KTHMIS Specialist.

### **Rescind User Access**

#### **Voluntary**

Use this procedure when any KTHMIS user leaves the agency or otherwise becomes inactive:

1. Send an e-mail notification to the KTHMIS Specialist. The user's ID and password status within the system will be changed to an "inactive" status. The user's ID or password will not be deleted.

### **Compliance Failure**

Use this procedure when any KTHMIS user breaches the PAEUA, or violates the Policies and Procedures, or breaches confidentiality or security:

1. Send an e-mail notification to the KTHMIS Specialist. The user's ID and password status within the system will be changed to an "inactive" status.
2. The KTHMIS Specialist will determine what other, if any, user IDs should be deactivated.

### **Reset Password**

1. When a user forgets his or her password or has reason to believe that someone else has gained access to their password, they must immediately notify their Partner Agency Site Administrator.
2. The Partner Agency Site Administrator will send a request via e-mail to the KTHMIS Specialist to reset the user's password and notify the user of the new temporary password.
3. If the user has set an account recovery security question, the user can reset their password by answering the security question correctly. The user will be emailed instructions on how to set up a new password.

## **5.3 Collection and Entry of Client Data**

### **Policies**

- Client data will be gathered according to the policies, procedures and confidentiality rules of each individual program.
- Client data may only be entered into KTHMIS with client's authorization to do so.
- All universal and program data elements from the HUD KTHMIS Data and Technical Standards (See Appendix), subject to client consent.
- Client data will only be shared with Partner Agencies if the client consents, has signed the Client Consent form, and the signed Client Consent form is available on record.
- Client data will be entered into KTHMIS in a timely manner.
- DV providers must record client data in a comparable database.
- Client identification should be completed during the intake process or as soon as possible following intake and within 24 hours.
- Service records should be entered on the day services began or as soon as possible within 24 hours.
- Required assessments should be entered as soon as possible following the intake process and within 24 hours.
- All client data entered into KTHMIS will be kept as accurate and as current as possible.
- Hardcopy or electronic files will continue to be maintained according to individual program requirements, and according to the HUD KTHMIS Data and Technical Standards Final Draft.
- No data may be imported without the client's authorization.
- Any authorized data imports will be the responsibility of the Partner Agency.
- Partner Agencies are responsible for the accuracy, integrity, and security of all data input by said Agency according HUD's guidelines and the KTHMIS Data Quality Plan.
- The Partner Agency that creates a client record owns the responsibility for a baseline of data quality to include: non-duplication of client record, Release Of Information (ROI), Universal & Program level data elements as defined by HUD Data Standards, up-to-date Program Entries and Exits, and answers to the questions, "Currently Homeless?" and "Chronically Homeless?"
- The Alliance will decide on a plan to dispose of (or remove identifiers from) client data seven (7) years after it was created or last changed.

## **Procedures**

- Refer to Data Quality Plan, User Manual and/or Training Materials for specific data entry guidelines.
- Kings United Way will provide each agency with an ongoing snapshot, and provide the training necessary in order for the Partner Agency to be able to download and report to the appropriate parties within the agency.
- The Partner Agency Site Administrator will share data with authorized personnel only (those with KTHMIS authorization).
- Partner Agency Site Administrator will be responsible for reviewing the Snapshot Reports and notifying users to make corrections, within ten days.
- Partner Agency Site Administrator will inform KTHMIS support staff if there are any technical issues retrieving the Snapshot Reports within three (3) business days.
- Upon request of Partner Agency Executive Management, Kings United Way will provide additional reports to assist the agency in verifying data quality.
- The HMIS Committee shall decide on the procedure to properly dispose of client data within the seven-year time frame allocated in the HUD Data Standards.

## **5.4 Release and Disclosure of Client Data**

### **Policies**

- Client-specific data from KTHMIS may be shared with Partner Agencies only when the sharing agency has secured a valid Release of Information from that client authorizing such sharing, and only during such time that Release of Information is valid (before its expiration). Other non-KTHMIS inter-agency agreements do not cover the sharing of KTHMIS data.
- Sharing of client data may be limited by program specific confidentiality rules.
- No client-specific data will be released or shared outside of the Partner Agencies unless the client gives specific written permission or unless withholding that information would be illegal (see Release of Information). Note that services may NOT be denied if client refuses to sign Release of Information or declines to state any information.
- Release of Information must constitute INFORMED consent. The burden rests with the intake counselor to inform the client before asking for consent. As part of informed consent, a notice must be posted explaining the reasons for collecting the data, the client's rights, and any potential future uses of the data. An example of such a sign for posting may be found at [www.kthomelessalliance.org](http://www.kthomelessalliance.org).
- Client shall be given print out of all data relating to them upon written request and within 10 working days or 15 calendar days if the Agency is a Health Care Provider.
- A report of data sharing events, including dates, agencies, persons, and other details, must be made available to the client upon request and within 10 working days or 15 calendar days if the Agency is a Health Care Provider.
- A log of all external releases or disclosures must be maintained for seven (7) years and made available to the client upon written request and within 10 working days or 15 calendar days if the Agency is a Health Care Provider.
- Aggregate data that does not contain any client specific identifying data may be shared with internal and external agents without specific permission. This policy should be made clear to clients as part of the Informed Consent procedure.
- Each Partner Agency Executive Director is responsible for his or her agency's internal compliance with the HUD Data Standard.

## **Procedures**

- Procedures for disclosure of client-specific data are readily obtained from the above policies, combined with the configuration of KTHMIS, which facilitates appropriate data sharing.

## **5.5 Workstation Security**

### **Policies**

- The Partner Agency Site Administrator is responsible for preventing degradation of the whole system resulting from viruses, intrusion, or other factors under the agency's control.
- The Partner Agency Site Administrator is responsible for preventing inadvertent release of confidential client-specific information. Such release may come from physical or electronic or even visual access to the workstation, thus steps should be taken to prevent these modes of inappropriate access (that is, don't let someone read over your shoulder: lock your screen).
- All workstations to be used with KTHMIS must be secured by a firewall between the workstation and the Internet. Software firewalls are acceptable.
- Recommended Internet connection: DSL or Cable Modem, at least 128 kbits.
- Recommended Browser: latest release of Internet Explorer version 11.0.
- Definition and communication of all procedures to all Partner Agency users for achieving proper agency workstation configuration and for protecting their access by all Agency users to the wider system are the responsibility of the Partner Agency Site Administrator.

### **Procedures**

- At a minimum, any workstation accessing HMIS needs to be protected by a Firewall. If the workstations are part of an agency computer network, the Firewall may be installed at a point between the network and the Internet or other systems rather than at each workstation.
- Each workstation also needs to have anti-virus and anti-spyware programs in use and properly maintained with automatic installation of all critical software updates.

## **5.6 Training**

### **Policies**

The Partner Agency Executive Director shall obtain the commitment of the Partner Agency Site Administrator and designated staff persons to attend training(s) as specified in the Agency Agreement between Partner Agency and Alliance/KUW.

### **Procedures**

#### **Start-up Training**

Alliance/KUW will provide training in the following areas prior to the Partner Agency using KTHMIS:

1. Partner Agency Site Administrator training
2. End user training
3. Confidentiality training

#### **Partner Agency Site Administrator Training**

Training will be done in a group setting, where possible to achieve the most efficient use of time and sharing of information between agencies. Training will include:

1. End user training
2. Running package reports

### **Follow-up Training**

Alliance/KUW will provide on-site follow-up training at each participating Partner Agency. Once the Partner Agency has “gone live,” KTHMIS representatives will make on-site visits as needed to ensure that the Partner Agency becomes proficient in the use of KTHMIS.

### **On-going Training**

Alliance/KUW will provide regular training for participating Partner Agencies, as needed. The areas covered will be:

1. Agency Site Administrator Training
2. End User Training
3. Confidentiality Training

## **5.7 Compliance**

### **Policies**

- Compliance with these Policies and Procedures is mandatory for participation in KTHMIS.
- Using the ClientTrack software, all changes to client data are recorded and will be periodically and randomly audited for compliance.
- 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 KTHMIS.
- Annually, KTHMIS will conduct a thorough review of Partner Agency internal policies and procedures regarding KTHMIS.

### **Procedures**

- See “Project Participation” and “User Authorization” sections for procedures to be taken for lack of compliance.
- Annually, a KTHMIS representative will conduct a site visit at each Partner Agency to ensure compliance. Agencies that are new to KTHMIS will be scheduled for a site visit six months from implementation of HMIS and then annually thereafter.

## **5.8 Technical Support**

### **Policies**

- Support requests include problem reporting, requests for enhancements (features), or other general technical support.
- Users shall submit support requests to their Partner Agency Site Administrator (email is suggested).
- Users shall not, under any circumstances, submit requests to software vendor.

- Users shall not submit requests directly to Alliance/KUW without specific invitation. All requests to Alliance/KUW shall be submitted to Partner Agency Site Administrator, who may then escalate to Alliance/KUW, who may then escalate to vendors as appropriate.
- Alliance/KUW will only provide support for issues specific to KTHMIS software and systems.

## **Procedures**

### **Submission of Support Request**

- User encounters problem or originates idea for improvement to system or software.
- User creates support request via email sent to Partner Agency Site Administrator specifying the severity of the problem and its impact on their work, specific steps to reproduce the problem, and any other documentation that might facilitate the resolution of the problem. User shall also provide contact information and best times to contact.
- The Partner Agency Site Administrator, upon receipt of a support request, shall make reasonable attempts to resolve the issue.
- If the Partner Agency Site Administrator is unable to resolve the issue and determines that the problem is specific to KTHMIS software and systems, the Partner Agency Site Administrator shall consolidate multiple similar requests and submit to Alliance/KUW.

*Note: If the Support Request is deemed by KTHMIS Specialist to be an agency-specific customization, resolution of the request may be prioritized accordingly. Alliance/KUW reserves the right to charge on an hourly basis for these changes if/when the workload for such agency-specific customizations becomes burdensome.*

- The KTHMIS Specialist may at this point determine that the cause of reported issue is outside the scope of control of the KTHMIS software and systems.
- The KTHMIS Specialist will consolidate such requests from multiple Partner Agencies, if appropriate, and strive to resolve issues according to their severity and impact.
- If the KTHMIS Specialist is unable to resolve the issue, other software or system vendor(s) may be included in order to resolve the issue(s).
- In cases where issue resolution may be achieved by the end user or other Partner Agency personnel, the KTHMIS Specialist will provide instructions via email to the Partner Agency Site Administrator.

## **5.9 Changes to This and Other Documents**

### **Policies**

The HMIS Committee of the Alliance will guide the compilation and recommendations for amendments of these Policies and Procedures. Final approval rests with the Alliance and KUW.

### **Procedures**

#### **Changes to Policies & Procedures**

- Proposed changes may originate from any participant in KTHMIS.
- When proposed changes originate within a Partner Agency, they must be reviewed by the Partner Agency Executive Director, and then submitted by the Partner Agency Executive Director to the KTHMIS Specialist for review and discussion.



- KTHMIS Specialist will maintain a list of proposed changes.
- The list of proposed changes will be discussed by the HMIS Committee, subject to line item excision and modification. This discussion may occur either at a meeting of the HMIS Committee, via email or conference call, according to the discretion and direction of the HMIS Committee Chairperson.
- Results of said discussion will be communicated, along with the amended Policies and Procedures. The revised Policies and Procedures will be identified within the document by the date of the HMIS Committee discussion.
- Partner Agencies Executive Directors shall acknowledge receipt and acceptance of the revised Policies and Procedures within 10 working days of delivery of the amended Policies and Procedures by notification in writing or email to KTHMIS Specialist. The Partner Agency Executive Director shall also ensure circulation of the revised document within their agency and compliance with the revised Policies and Procedures.

## 6. Data Quality

### 6.1 Definition of Data Quality

HMIS data quality refers to the extent that data recorded in the Kings/Tulare HMIS accurately reflects the same information in the real world. A perfect overlap between data and reality would result in a hypothetical data quality rating of 100 percent, while a data quality rating of 0 percent would indicate that there is no match between the information entered into an HMIS and the same information in the real world. No data collection system has a quality rating of 100%. However, to meet the Kings/Tulare HMIS goal of presenting accurate and consistent information on homelessness, it is critical that the Kings/Tulare HMIS have the best possible representation of reality as it relates to homeless people and the programs that serve them. Specifically, it should be our goal to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent of homelessness and the impact of homeless services.

#### Importance of Data Quality for HMIS Goals

Data quality is greatly improved when the goals of data collection are clear. The goals of HMIS on a national level were stated by Congress:

“There has never been an overall review or comprehensive analysis on the extent of homelessness or how to address it. The Committee believes that it is essential to develop an unduplicated count of homeless people, and an analysis of their patterns of use of assistance ...including how they enter and exit the homeless assistance system and the effectiveness of assistance.”

Thus, the 2001 Congressional directive targets information to understand:

- The extent of homelessness,
- The nature of homelessness (implied in “comprehensive analysis” and necessary to know “how to address”),
- Homeless service use patterns, and
- The effectiveness of the homeless service system
- These goals are not only important on the federal level but also critical for understanding homelessness and program planning at the local level.

#### Extent of Homelessness

The number of homeless people has been at the center of debate for as long as homelessness has been

acknowledged as a social problem. Due to inconsistent or no data collection, different estimation methods result in largely diverse numbers. One goal of HMIS is to estimate the number of homeless people that closely represents reality. By collecting personal information on all clients served, HUD hopes to generate an estimate of the unduplicated count of homeless people that access services nationally.

Achievement of this goal depends on high quality personal identifying data, such as Social Security Number, names, gender and date of birth, which are used to create unduplicated counts.

### **Nature of Homelessness**

Additional HMIS data elements focus on the characteristics of those engaged in homeless services. Analyzing this information on a larger level will improve our understanding of the people experiencing homelessness, the issues they face, and their service needs. High quality data on gender, date of birth, race, ethnicity, veteran's status and disability, and household composition are needed for this goal.

### **Pattern of Homeless Service Utilization**

People who are homeless often use more than one of the programs that are available to help them access housing, resolve their crisis, support them, and link them with other services. Accurate program entry and exit dates and information on residence prior to program entry are critical in determining service use patterns that assess average length of stay and movement among different homeless programs. The collection of accurate identifying information at each program is also necessary in order to identify the extent to which clients appear in multiple programs, how clients move through the system, and to detect cycles of homelessness.

### **Effectiveness of the Homeless Service System**

Assessing the effectiveness of the current homeless service system is critical to finding successful solutions to ending homelessness. For that reason, information at program exit, such as destination and income, are important to learn if and how the system has helped to resolve clients' housing crisis and to improve their overall stability. Data on returning clients also contribute to this goal. Comparing program entry data with program exit data at the aggregate level will also provide a picture of homeless program impacts on the clients they serve.

## **6.2 Data Quality Issues and Standards**

### **Timeliness of Data**

To ensure the most up to date data, information should be entered as soon as it is collected. Information that tends to change periodically also needs to be regularly verified and/or updated, such as information on income sources and amounts. Information other than intake data needs to be updated monthly by the fifth day in the following month. Exceptions to the timeliness principle are made for domestic violence providers, which may wait until clients leave the shelter before entering data into the Kings/Tulare HMIS.

#### **Reporting Submission Deadlines:**

- Complete and accurate data for the month must be entered into the Kings/Tulare HMIS by the fifth working day of the following month. For example, data for the month of April must be entered into ClientTrack by the fifth working day of May.
- Data Quality Reports (Snapshots) will be sent out monthly following the LSA reporting period which runs October 1<sup>st</sup> to September 30<sup>th</sup>.
- The monthly Snapshot Reports will be issued the following month. Corrections and feedback will be due back within 10 days from which they were issued.

### **Data Completeness**

To release meaningful information from the Kings/Tulare HMIS, data needs to be as complete as possible, i.e. they should contain all required information on all people served in a certain type of program (i.e. emergency shelter) during a specified time period. On the macro level, the goal of achieving adequate HMIS coverage and participation by all local programs is essentially about ensuring that the records are representative of all the clients served by these programs. If a client record is missing, then aggregate reports may not accurately reflect the clients served by the program. Similarly, if an entire program is missing, data from the Kings/Tulare HMIS may not accurately reflect the homeless population in the community.

### **Missing Client Records**

Even with all programs participating, it is possible that not every client served by the program is actually being entered. Missing client records from participating programs is particularly problematic since, unlike missing programs, the extent of those missing is difficult to quantify. In addition, like with missing programs, missing clients within a program might have characteristics that skew the data findings.

Agencies are strongly encouraged to address the issue of missing client records by comparing paper records (e.g. manual nightly shelter check-in lists) with the information entered into the Kings/Tulare HMIS.

### **Incomplete Client Records**

The second type of incompleteness in a dataset is missing fields within particular client records. Standards have been set to ensure that all required fields are consistently answered. This has been accomplished by setting many fields as required in the software application and by publishing instructions for intake and discharge applications.

Where possible, if clients do not know or refuse to answer a particular question, this should be stored as an answer in the database, rather than leaving the field empty.

### **Data Accuracy**

Information entered into the HMIS needs to be valid, i.e. it needs to accurately represent information on the people that enter any of the homeless service programs contributing data to the HMIS. Inaccurate data may be intentional or unintentional. In general, false or inaccurate information is worse than incomplete information, since with the latter, it is at least possible to acknowledge the gap. Thus, it should be emphasized to clients and staff that it is better to enter 'Data not Collected' (or preferably "don't know" or "refused") than to enter inaccurate information.

There are a number of unintentional errors that can occur during intake and data entry. These include:

- Accidentally selecting wrong response from dropdown;
- Misspelling (based on not knowing the proper spelling);
- Transposition of characters, or missed keys (accidental typographical errors);
- Swapped fields (e.g., first name in last name field, or intake date in exit date field);
- Use of nicknames instead of real names;
- Inaccuracies based on misunderstanding the question;
- Hearing the wrong information; and
- Transcription errors, including the inability to read handwriting.

### **Incomplete Identifying Information**

Incomplete client identifying information – specifically, name, Social Security Number, and date of birth – will impede the Alliance’s ability to determine unique clients, hinder the client matching process, and throw off the unduplicated count of clients and households. If insufficient data is provided, it is impossible to verify whether two records represent the same client; thus, the count could appear higher than it is in reality. It could also be lower than it should be, if for example, there are two clients with the same name, but no Social Security Number is recorded for one of the clients. The Kings/Tulare HMIS staff or data analyst might assume they are the same client. However, a Social Security Number could have proven that they were different clients.

Homeless families also need to share a unique Household Identifier in order to link all of their members for analyses. If this information is missing, it is impossible to get accurate counts of families served, data on family composition will be invalid, and each family member may be incorrectly counted as a single individual served. Although the Household Identifier itself is usually system generated, users must enter clients in a particular way in order to ensure that the clients are related properly.

When possible, staff should note any third-party documentation that has been provided for verification purposes. Providing clients with access to review and correct the personal information that has been entered in the HMIS can improve data accuracy. This is also a client’s right, as published in the HUD Data and Technical Standards.

In addition, the following standards have been established to ensure maximum data integrity:

- All clients shall have unique ID numbers (Social Security Number or system-generated ID).
- Missing/unknown data in Client Track is less than 10% per month in required variable fields. The only data variable exception to accuracy, with respect to ‘Unknown’ is the variable Destination.
- All data entered is compatible with the agency’s program in ClientTrack. For example, a family cannot be entered at a single men’s shelter or a single women’s shelter.
- Data in the Kings/Tulare HMIS must accurately reflect client data recorded in the agency’s client file and known information about the client and services provided to the client. For example, ‘Entry Date’ should be the date the client enrolled in the shelter and began receiving services, and ‘Exit Date’ should be the date the client physically exited the shelter.
- Data for active clients should be reviewed and updated monthly.
- Each agency program will establish procedures, controls and audit trails to ensure that all clients are entered into ClientTrack.

There are two main approaches to ensuring that all required fields are completed consistently: software validation and data quality reporting:

- With software validation, records are not saved unless all required fields are entered. This approach is effective at capturing something for every field, but may also lead to staff entering inaccurate information just so they can save the data.
- Data quality reporting that occurs after the fact. Reports of actual client lists are generated that highlight missing or questionable data. These reports are the catalyst for staff to go back and actually fill in the missing records or make corrections.

### **Data Consistency**

Consistency of data collection and data entry refers to a shared understanding of what data needs to be collected and in which way. Agencies are to refer to the HUD Data Standards for a complete description of each data element.

Much of the data in the Kings/Tulare HMIS is self-reported by people seeking homeless services. Often people in the vulnerable position of being homeless may give incorrect information intentionally or unintentionally for a host of reasons. Inaccurate information can be minimized by establishing a rapport with the consumer. Consumers often are not aware of the critical connection between funding and services. Communicating why the client's information is being collected, how it will be used, and how it helps the agency secure and sustain funding for the program may also be a valuable way to build understanding and support from the client. It is advisable for all staff to agree on a minimal level of information that all clients should receive. The agency may want to write out talking points and/or train users on how to consistently explain the HMIS and data collection.

### **Entering Data**

Ideally, the same person who collects HMIS data should enter that data into ClientTrack.

This assures consistent interpretation of the questions, the answers, and handwriting. At many service agencies having one person do both is not possible; e.g., day shifts might collect the data, night staff might enter it when things are less hectic. Also, the same people who are good at interviewing clients may not be good at entering data, or vice versa.

When it is not possible to have the same person collect and enter data, a clear process and communication between data intake and entry staff is essential. This will minimize any misinterpretations. Staff members doing these two tasks should meet before they begin and consistently check-in to resolve any confusion over notes on the intake form, agree on shorthand usage, clarify confusing questions, and discuss anything else that comes up. A data quality log can track open questions. Supervisors should ensure that this communication happens regularly at each agency.

### **Ongoing Training for Staff**

Ongoing training in ClientTrack is needed periodically for data entry staff to ensure ongoing data quality. The need can vary depending on the number of changes/upgrades to the software and the overall complexity of the software. It also depends on the skills of the users. Staff that is less comfortable with computers in general should consider refresher trainings to catch mistakes they may be making and affirm correct usage. All staff can benefit from trainings that go deeper into software. K/T HMIS will have at least one data quality focused training annually.

### **Monitoring**

Monitoring data quality is a crucial part of the success of K/T HMIS. All participating agencies shall develop protocols for monitoring the quality of the data entered into the K/T HMIS. In addition, the K/T HMIS staff will conduct an annual site visit to ensure that the agency is compliant with all K/T HMIS compliance standards.

### **Accountability**

Each agency that agrees to participate in the K/T HMIS will be held accountable to follow all HUD regulations regarding HMIS including, but not limited to, privacy standards and data quality. All agencies seeking funding through the Alliance will be ranked according to their participation in HMIS and how well they comply with the K/T HMIS Policy and Procedures and Data Quality Plan.

Additionally, K/T HMIS staff will prepare quarterly System and Program Level Indicator Reports. This report will track the Standard Performance Measures (see Appendix) as adopted by the Alliance.

## 7. Other Obligations and Agreements

The current HUD grant for KTHMIS provides for a limited number of user licenses. While it may not be possible to meet every agency's full requirements for licenses within the HUD grant, KTHMIS will endeavor to ensure that every agency participating will have their minimum requirements met from the HUD grant.

### 7.1 HUD HMIS Data and Technical Standards

This document should, at a minimum, reflect the baseline requirements listed in the HMIS Data Standards, as published by HUD in 2017. Users of KTHMIS are required to read and comply with the HMIS Data Standards. Failure to comply with these standards carries the same consequences, as does failure to comply with these Policies and Procedures. In any instance where these Policies and Procedures are not consistent with the KTHMIS Standards from HUD, the HUD Standards take precedence. Should any inconsistencies be identified, notice should be made to the KTHMIS Specialist.

### 7.2 HIPAA

For agencies or programs where HIPAA applies, HIPAA and California State Law requirements take precedence over both the HUD HMIS Data Requirements (as specified in those requirements) and these policies and procedures.

## 8. Forms Control

All forms required by these procedures are available in PDF format on the Alliance's website, [www.kthomelessalliance.org](http://www.kthomelessalliance.org).

### Filing of Completed Forms

Form Description	Location	Responsibility
Agency Agreement	Kings United Way	HMIS Specialist
Site Administrator Agreement	Kings United Way	HMIS Specialist
Interagency Data Network Sharing Agreement	Kings United Way	HMIS Specialist
End User Agreement	Kings United Way	HMIS Specialist
Intake Form	Partner Agency	Agency Staff
Client Consent – Release of Information for Data Sharing	Partner Agency	Agency Staff
Client Revocation of Consent to Release Information for Data Sharing	Partner Agency	Agency Staff
Reassessment Form	Partner Agency	Agency Staff
Exit Form	Partner Agency	Agency Staff

## **Appendix A: Universal and Program Specific Data Elements and Federal Partner Grant Program Overview Interactive Tool**

The interactive tool created by HUD is designed for CoC's, HMIS Lead Agencies, HMIS Users, and HMIS Software Providers to help them understand the data elements that are required in an HMIS to meet participation and reporting requirements established by HUD and other federal partners at VA and HHS. FY 2024 data standards are effective as of October 1, 2023.

To access the interactive tool, click here: [HMIS Data Standards - HUD Exchange](#).

## Appendix B: Standard Performance Measures Matrix

Goal	Purpose	Systems	Program Outcome Targets	Outcomes Calculation
Housing Stability	Indicates program/system level success in ending homelessness as measured by those who retain permanent housing or attain other permanent housing.	<ul style="list-style-type: none"> <li>■ Permanent Supportive Housing</li> </ul>	95.5% of persons will remain in the permanent housing program as of the end of the operating year or exit to permanent housing (subsidized or unsubsidized).	The number of Stayers in the program PLUS the number of Leavers who exited to a permanent housing destination ÷ by the total number of Stayers and Leavers.
		<ul style="list-style-type: none"> <li>■ Rapid Re-Housing</li> </ul>	67% of persons will remain in the permanent housing program as of the end of the operating year or exit to permanent housing (subsidized or unsubsidized).	Permanent housing placement is calculated by determining the number of Leavers who exited to a permanent housing destination ÷ the total # of Leavers.
		<ul style="list-style-type: none"> <li>■ Transitional Housing</li> </ul>	45% of persons will exit to permanent housing (subsidized or unsubsidized) during the operating year.	Permanent housing placement is calculated by determining the number of Leavers who exited to a permanent housing destination ÷ the total # of Leavers.
		<ul style="list-style-type: none"> <li>■ Emergency Shelter</li> </ul>	18.5% of persons will exit to permanent housing (subsidized or unsubsidized) during the operating year.	Permanent housing placement is calculated by determining the number of Leavers who exited to a permanent housing destination ÷ the total # of Leavers.
		<ul style="list-style-type: none"> <li>■ Street Outreach</li> </ul>	61% of persons will exit to safe housing (subsidized or unsubsidized) during the operating year.	Safe housing placement is calculated by determining the number of Leavers who exited to a safe housing destination (as defined by HUD) ÷ the total # of Leavers.



Goal	Purpose	Systems	Program Outcome Targets	Outcomes Calculation
Increased Total Income for System Stayers	Indicates that program is assisting households to obtain sufficient income to attain housing or assisting households to stabilize housing by becoming employed or maintaining employment. A higher rate is considered positive.	<ul style="list-style-type: none"> <li>■ Permanent Supportive Housing</li> <li>■ Rapid Re-housing</li> <li>■ Transitional Housing</li> </ul>	28% of persons age 18 and older will increase their total income (from all sources) as of the end of the operating year.	The # of adults whose amount of total income from any source increased based on the persons income at intake and then at their most recent assessment ÷ by the total # of adult Stayers.
Increased Total Income for System Leavers	Indicates that program is assisting households to obtain sufficient income to attain housing or assisting households to stabilize housing by becoming employed or maintaining employment. A higher rate is considered positive.	<ul style="list-style-type: none"> <li>■ Permanent Supportive Housing</li> <li>■ Rapid Re-housing</li> <li>■ Transitional Housing</li> </ul>	25.4% of persons age 18 and older will increase their total income at program exit.	The number of adults whose amount of total income increased based on the persons income at intake and then at exit ÷ by the total # of adult Leavers

Goal	Purpose	Systems	Program Outcome Targets	Outcomes Calculation
Bed Utilization	Indicates efficient use of community resources. High occupancy rate indicates system efficiency at turning over units and providing programs that are well-designed.	<ul style="list-style-type: none"> <li>■ Emergency Shelter</li> <li>■ Transitional Housing</li> <li>■ Rapid Re-Housing/</li> <li>■ Permanent Supportive Housing</li> </ul>	<ul style="list-style-type: none"> <li>■ 65% min. bed utilization for ES</li> <li>■ 80% min. bed utilization for TH</li> <li>■ 100% min. bed utilization for RRH</li> <li>■ 85% min. bed utilization for PSH</li> </ul>	Total number of bed nights ÷ total number of nights in the month.

Average Length of Stay	A reasonably short length of stay indicates efficiency related to turnover of beds which is essential to meet system demand for emergency shelter.	<ul style="list-style-type: none"> <li>■ Emergency Shelter</li> <li>■ Transitional Housing</li> </ul>	Currently tracked but not monitored.	Exit Date (or report end date) - Entry Date ÷ number of clients served during the report period.
Average Length of Participation	Indicates that system is assisting households to achieve independence without long term reliance on the system.	<ul style="list-style-type: none"> <li>■ Rapid Re-Housing</li> <li>■ Permanent Supportive Housing</li> </ul>	Currently tracked but not monitored.	Exit Date (or report end date) - Entry Date ÷ number of clients served during the report period.
Households Served	Indicates volume of households served by the system and provides a better understanding of household size as it relates to unit occupancy.	<ul style="list-style-type: none"> <li>■ Emergency Shelter</li> <li>■ Transitional Housing</li> <li>■ Permanent Housing</li> </ul>	Currently tracked but not monitored.	The number of households served by the program (or system) during the report period.
Newly Homeless	Indicates the volume of newly homeless persons served by emergency shelters.	<ul style="list-style-type: none"> <li>■ Emergency Shelter</li> <li>■ Transitional Housing</li> <li>■ Permanent Housing</li> </ul>	Currently tracked but not monitored.	The number of newly homeless <sup>1</sup> clients ÷ total number of clients served during the report period.

---

<sup>1</sup> Newly Homeless is defined as the number of persons that entered the emergency shelter during the report period that have not been served by other programs in the HMIS within the past two years.

Goal	Purpose	Systems	Program Outcome Targets	Outcomes Calculation
Recidivism	Indicates system's success in ending homelessness as measured by number of households who attain housing and do not return or enter shelter subsequent to successful housing outcome.	<ul style="list-style-type: none"> <li>■ Street Outreach</li> </ul>	30% or less will return to homelessness within two years after their initial exit.	The total number of recidivist clients <sup>2</sup> ÷ the total number of clients served during the report period.
		<ul style="list-style-type: none"> <li>■ Emergency Shelter</li> </ul>	4.5% or less will return to homelessness within two years after their initial exit.	The total number of recidivist clients <sup>2</sup> ÷ the total number of clients served during the report period.
		<ul style="list-style-type: none"> <li>■ Transitional Housing</li> </ul>	7.7% or less will return to homelessness within two years after their initial exit.	The total number of recidivist clients ÷ the total number of clients served during the report period.
		<ul style="list-style-type: none"> <li>■ Rapid Re-Housing</li> </ul>	4.7% or less will return to homelessness within two years after their initial exit.	The total number of recidivist clients ÷ the total number of clients served during the report period.
		<ul style="list-style-type: none"> <li>■ Permanent Supportive Housing</li> </ul>	10.0% or less will return to homelessness within two years after their initial exit.	The total number of recidivist clients ÷ the total number of clients served during the report period.
Equity	Indicates the amount of disparity between our system and local census data.	<ul style="list-style-type: none"> <li>■ Coordinated Entry</li> <li>■ Street Outreach</li> <li>■ Emergency Shelter</li> <li>■ Transitional Housing</li> <li>■ Rapid Re-Housing/</li> <li>■ Permanent Supportive Housing</li> </ul>	Currently tracked but not monitored.	The total number of clients in each sub-population ÷ the total number of clients in that system.

<sup>2</sup> A recidivist client is defined as one that exits a system with a successful outcome (specific to that system) and re-enters the system within one year after exit from the system.