

# **O'ahu Continuum of Care HMIS Policies and Procedures Manual**

Honolulu, O'ahu (HI-501) CoC

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## **HMIS Background and Structure**

### ***A. Background***

The O'ahu Homeless Management Information System (HMIS) is a countywide software program that is designed to capture client-level information over time on the characteristics and service needs of individuals at-risk of and experiencing homelessness. In response to a Congressional directive, the Department of Housing and Urban Development (HUD) has required all Continuums of Care (CoCs) across the country to implement HMIS at the local level. The O'ahu CoC selected Partners in Care 501c3 as the lead agency and the managing entity for the O'ahu HMIS.

Since inception in 2004, the HMIS has matured into a complex data collection and reporting tool utilized by homeless service providers across the Island of O'ahu. HMIS enables the sharing of client data, allowing for a greater collaboration amongst homeless service providers across O'ahu.

The primary goal of the HMIS is to better understand the scope and dimensions of homelessness locally and nationally in order to address the problem more effectively. Through the implementation of advanced technology, the HMIS also directly benefits service providers and homeless clients by providing more efficient and coordinated services. The HMIS is a valuable resource because of its capacity to integrate and un-duplicate data from all homeless assistance and homelessness prevention programs within the CoC. Aggregate HMIS data can be used to understand the size, characteristics, and needs of the homeless population at the local, state, and national levels. The HMIS application enables organizations that operate homeless assistance and homelessness prevention programs to improve case management by collecting information about client needs, goals, and service outcomes.

### ***B. HUD Data and Technical Standards***

HUD published the Homeless Management Information System (HMIS) Data and Technical Standards Final Notice on July 30, 2004. The final notice describes the types of data that HUD funded providers must collect from clients receiving homeless assistance services. The notice also presents privacy and security standards for providers, CoCs, and all other entities that use or process HMIS data. These data standards were revised in October 2014, September 2015, June 2016, October 2017, and October 2019. The revised data standards can be found at the following link: <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

Additional HMIS resources can be found at the following link:  
<http://www.hudhdx.info/>

### ***C. Longitudinal Systems Analysis (LSA)***

The Longitudinal Systems Analysis (LSA) report, produced from a CoC's [Homelessness Management Information System](#) (HMIS) and submitted annually to HUD via the [HDX 2.0](#), provides HUD and CoCs with critical information about how people experiencing homelessness use their system of care. This page provides guidance for CoCs about how to use and interpret their LSAs as well as for HMIS software providers about how to develop the report.

The LSA introductory guide can be found at the following link: <https://www.hudexchange.info/homelessness-assistance/lsa/>

### ***D. HUD System Performance Measures (SPM)***

The McKinney-Vento Homeless Assistance Act, as amended, focuses on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community. The Act now requires communities to measure their performance as a coordinated system, in addition to analyzing performance by specific projects or project types.

The Act has established a set of selection criteria for HUD to use in awarding CoC funding that require CoCs to report to HUD their system-level performance. The intent of these selection criteria are to encourage CoCs, in coordination with ESG Program recipients and all other homeless assistance stakeholders in the community, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD. Specifically, the SPM assesses the CoC's performance against the following measures:

Measure 1: Length of Time Persons Remain Homeless

Measure 2: The Extent to which Persons Exiting Homelessness to PH Destinations Return to Homelessness

Measure 3: Number of Homeless Persons: Change in PIT and Annual Counts

Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Measure 5: Number of persons who become homeless for the 1st time

Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition in CoC Program-funded Projects

Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of PH

Instructions and guidance can be found at the following link: <https://www.hudexchange.info/programs/coc/system-performance-measures/>

## ***E. HMIS Organization and Management***

### **Project Goals**

The goals of Oahu's HMIS are to:

1. Assist homeless service organizations with information allowing them to better serve their clients
2. Gain a greater understanding of the numbers and characteristics of the homeless population
3. Identify the needs of the homeless, both met and unmet
4. Provide information on services homeless individuals receive as well as monitor outcomes and program performance
5. Increase community awareness and understanding of issues related to homelessness

### **Project Organization**

Oahu's HMIS Lead Organization is Partners in Care (PIC). PIC oversees the HMIS through the HMIS Administration Team and is responsible for administering HMIS funds for management activities and improvements to the system.

The HMIS Lead Organization provides the following system administrative services to the CoC

1. System Configuration and Customization
2. Data Quality Assurance
3. Reports Development
4. Data Analysis
5. System Monitoring
6. In-Person and On-Line User Training
7. Technical Assistance and Support
8. System Compliance and Updates
9. Community Partnership and Coordination
10. Assist/Manage Special Projects
11. Integrate the Coordinated Entry System (CES)
12. Generate HUD-mandated reports

### **HMIS Development and Planning**

The CoC solicits feedback from organizations and stakeholders and communicates that feedback for improvement. The CoC's Data Committee's responsibilities include:

1. Soliciting feedback and recommendations on HMIS implementation from users and CoC Board members

2. Using feedback to continually improve functions and use of HMIS
3. Developing the HMIS Strategic Plan
4. Reviewing annually the formal written policies and procedures for the operation of HMIS
5. Monitoring data quality CoC wide and furthering data quality improvement with Participating Programs
6. Collaborating with other PIC committees and the Hawaii Interagency Council on Homelessness to improve reporting, outcomes, and analysis (as needed)
7. Making recommendations for the CoC about the operation of the HMIS
8. Making recommendations on organization access to the HMIS for inclusion in the HMIS for user level access below HMIS Lead
9. Review and respond to data requests
10. Ensure that HMIS vendor software provides a software that meets the needs of the community
11. Make recommendations to Data Committee and membership regarding retention on HMIS vendor or implementation of other software platform

The O’ahu CoC Data Committee is headed by a Data Committee Chair who is in direct contact with Partners in Care and the PIC HMIS Administration Team. Members of the Data Committee include homeless service providers as well as government and community stakeholders.

### **HMIS Implementation**

The CoC is responsible for ensuring that all organizations in the CoC are adhering to local HMIS Policies and Procedures. The HMIS Lead Organization has developed written and video training materials and training policies for all HMIS users and delivers those materials and policies at initial and on-going, annual HMIS trainings. Organizations can also request additional training and technical assistance from the HMIS Administration Team.

Participating HMIS organizations must require users to read and understand all participation requirements and HMIS Policies and Procedures, complete all required documentation prior to accessing the system, and become trained on how to use the HMIS before receiving access to the system. When an organization wants to add a new user, the individual must read and sign the PIC O’ahu HMIS User Agreement Form. This form is then submitted to the HMIS Administration Team, which will issue a user name and password following HMIS training. For full details on adding new users, see the [HMIS Training Policies and Access Requirements document](#) found in the appendix.

### **HMIS System Errors**

For issues related to system errors, organizations and the CoC representatives should communicate directly with the HMIS Lead Organization. All HMIS-related issues and questions should be directed to [hmis@partnersincareoahu.org](mailto:hmis@partnersincareoahu.org).

The HMIS Lead Organization, along with the O’ahu CoC Data Committee, will provide all HMIS user organizations with regular updates on any changes, improvements, or repairs to HMIS. These updates will be shared via Data Committee meetings, email, and HMIS training sessions.

### **Project Management**

The contact for the HMIS Lead Organization is the HMIS Data Manager, who can be contacted through email at [hmis@partnersincareoahu.org](mailto:hmis@partnersincareoahu.org)

The O’ahu CoC Data Committee meets on a monthly basis and welcomes new attendance. Contact information for all attendees is provided at committee meetings. The lead contact for the Data Committee can be found on the PIC website at [www.partnersincareoahu.org](http://www.partnersincareoahu.org).

### **HMIS Roles and Responsibilities**

#### **HMIS USERS**

- Maintain up-to-date knowledge of HMIS changes
- Maintain password integrity

- Explain privacy policy and consent to share practices
- Input acknowledgement of consent in HMIS
- Enter and update data
- Adhere to HMIS Policies and Procedures
- Adhere to Privacy and Security Policies
- Alert HMIS lead of potential security breaches
- Maintain and adhere to Data Quality standards

#### HMIS PARTICIPATING ORGANIZATIONS

- All HMIS Organizations must be a full member of the CoC and participate in at least one CoC committee. For a full list of committees, visit <https://www.partnersincareoahu.org>.
- All O’ahu CoC funded programs mandated by HUD to input into HMIS must input into the HI-501 HMIS.
- Establish and maintain a real-time Authorized Points of Contact for HMIS-related matters using the form found in the appendix.
- Ensure adherence to HMIS Policies and Procedures
- Ensure adherence to HMIS Privacy and Security Policies
- Communicate issues to and request support and technical assistance from the HMIS Administration team at [hmis@partnersincareoahu.org](mailto:hmis@partnersincareoahu.org)
- Adhere to Data Quality standards
- Adhere to the HMIS Participation Agreement

#### HMIS LEAD ORGANIZATION

- Manage the O’ahu HMIS
- Ensure all correspondence with vendor is coordinated through HMIS lead
- Contract with HMIS vendor if applicable
- Attend meetings and coordinate with the PIC Data Committee
- Obtain feedback from CoC Representatives
- Inform Organizations of CoC-specific policies
- Submit HUD designated reports
- Communicate concerns, issues, and enhancement requests to the CoC
- Monitor adherence to HUD HMIS Data and Technical Standards, HMIS utilization by CoC Organizations, and system-level data quality
- Troubleshoot implementation and training needs with HMIS Participating Organizations and provide assistance
- Fulfill approved data requests
- Provide user trainings and help desk functionality
- Communicate national HMIS best practices to O’ahu Data Committee
- Review and revise the HMIS Privacy Plan, Security Plan, and Data Quality Plan annually
- Secure contract with HMIS vendor

#### HMIS DATA COMMITTEE

Note: There are multiple committees within the CoC that are involved with the HMIS. The Data Committee is the main contributor to the HMIS mission.

- Vote to approve/reject changes that affect data entry and end-user experience
- Provide feedback on proposed changes to HMIS functionality
- Review recommendations by the HMIS regarding HMIS vendor
- Enforce HMIS Data Quality policies
- Approve data requests
- Determine organizations’ HMIS access
- Monitor the HMIS Lead for compliance

- Approve revisions to the HMIS Privacy Plan, Security Plan, and Data Quality Plan
- Reports to the Board of Directors and the CoC

### ***F. Domestic Violence Organizations***

According to the HUD Federal Register dated March 16, 2007 [FR-5056-N-01], organizations that are classified as Domestic Violence Organizations must not enter any identifying information into the HMIS. Specifically, the federal register states:

“The new Confidentiality provision directs victim service providers not to disclose, for the purposes of HMIS, personally identifying information about any client. In accordance with this statutory requirement, victim service providers must maintain the confidentiality of personally identifying information of the providers’ clients.”

HUD has instructed Domestic Violence organizations not to use HMIS to enter any client level information, including non-identifying information. If the Domestic Violence organizations are funded by HUD (CoC or ESG funds) they must use an HMIS comparable database that adheres to the latest HMIS Data and Technical Standards.

### ***G. HMIS Monitoring***

The HMIS Lead Organization is responsible for monitoring the HMIS Participating Organizations for compliance with HUD HMIS Data and Technical standards and the Data Quality Plan. The CoC is responsible for encouraging and enforcing Participating Organizations’ responsiveness to the HMIS Lead Organization monitoring.

#### **CoC Monitoring of the HMIS Lead**

The O’ahu CoC data committee will review and monitor the HMIS lead on an annual basis in accordance with HUD guidelines.

#### **HMIS Lead Monitoring of Participating Organizations**

It is the responsibility of the CoC, the HMIS Lead Organization, HMIS Participating Organization Executive Directors, and all service providers to conduct monitoring and provide notification to the CoC of the progress of participating programs.

It is the responsibility of HMIS Participating Organizations to comply with the HMIS Data Quality Plan and to collaborate with the HMIS Lead Organization and support staff to quickly correct data that does not meet the compliance thresholds.

The HMIS Administration Team and support staff will run reports to identify data quality successes and concerns. It will send those data, as well as procedures to improve or correct the data, to organizations’ Authorized Points of Contacts. It is the responsibility of the HMIS Lead Organization and the Data Committee to communicate Participating Organizations’ performance and responsiveness to the CoC, and for the CoC to hold the providers accountable for non-compliance and deviance from acceptable standards. The full Policies and Procedures of Data Quality monitoring can be found in the HMIS Data Quality Plan.

It is the responsibility of HMIS participating programs to comply with the HMIS Security and Privacy Plan and to collaborate with the HMIS Lead Organization and support staff to quickly identify and correct violations of the Plan. It is the responsibility of the CoC to implement effective improvement and enforcement policies and procedures to support the monitoring and improvement process.

The HMIS Lead Organization and support staff will conduct annual on-site monitoring following the steps laid out in the HMIS Security and Privacy Plan. HMIS Participating Organizations should continuously self-monitor following these same steps. The PIC Data Committee and HMIS Lead Organization, in conjunction with the CoC, will review violations and recommend corrective and disciplinary actions. The full policies and procedures of this monitoring can be found in the HMIS Security and Privacy Plan.

# HMIS Data Quality Plan

## A. Overview and Purpose

This document introduces the Data Quality Plan (DQP) for Oahu's HMIS. The HMIS covers the Honolulu CoC (HI-501).

**Data Quality** refers primarily to the reliability and validity of client-level data collected by the service provider staff that input these data into HMIS for storage, tabulation, and analysis. **Reliability** refers to the degree to which the data are complete (e.g., all questions answered with valid and useable responses) and consistent (results can be duplicated within and across different sites collecting data using the same instruments). **Validity** measures the degree to which data are accurate and represent, to the best extent possible, the true measure of the concept.

While focusing on data quality for federally-funded projects where data is entered into the HMIS, it is necessary to ensure accurate reporting for those grants, any project that enters data into HMIS contributes to the overall picture of homelessness within the CoC and is expected to participate in this DQP.

Benefits of reliable and valid (accurate) client data include:

1. An increased understanding of characteristics of persons experiencing homelessness and how characteristics may change over time and geography
2. The provision of accurate information about persons who utilize the homeless services system
3. The generation of accurate measures of program performance serving homeless populations
4. The provision of empirical information that can be the basis of new program interventions
5. Is a requirement based on funding the CoC and participating organizations receive;
6. Affects funding opportunities for providers;
7. Affects clients through the Coordinated Entry process and may determine which services they are or are not eligible for
8. The provision of aggregate data that allows the CoC and providers within the CoC to tell the story of homelessness as realistically and completely as possible

This DQP reflects an effort to document and define procedures and benchmarks that will enhance the ability of the CoC to achieve statistically reliable, accurate and complete data. The DQP sets expectations, methods, and execution standards (benchmarks) that will be implemented by the HMIS Lead Organization in an effort to improve data quality for the purposes of analysis, reporting, and planning.

The DQP includes protocols for on-going data quality monitoring that meet or exceed requirements set forth by the United States Department of Housing and Urban Development (HUD). It has been developed by the HMIS Lead Organization, the PIC Data Committee, HUD Technical Advisors, and local HMIS participating service providers.

The CoC and Data Committee will work in conjunction with the HMIS Administration team to ensure all providers have access to the tools they need to ensure high data quality, including training, data quality reports, encouragements to maintain a high level of data quality, and enforcements for non-responsiveness to data quality concerns. While the HMIS Administration team is responsible for a large part of the overall DQP, the team will look to the CoC and Data Committee to maintain a high level of involvement to ensure providers respond to data quality concerns and that the data quality within the HMIS is both acknowledged and addressed on an ongoing, iterative, continual basis and in an objective, data-driven manner.

This document addresses how the CoC will both encourage and enforce the DQP, with transparency about how a provider's data quality can bring about both incentives and consequences. The DQP is then broken out into the various components of data quality – completeness, timeliness, accuracy, consistency, and bed coverage. The sections will address the baseline minimum requirements to maintain a sufficient level of data quality, and depending on the section, the baseline minimum requirement will be broken out by project type. The Data Quality Monitoring Visit Report and Improvement Plan is a tool that will be used for providers and end users consistently failing to maintain a baseline minimum requirement – specifics of how that will be determined and what the tool includes is described in that section.

The DQP ends with an appendix about the expectation of the HMIS Administration team and the data quality baseline minimum



requirements for provider and system set-up and maintenance of the overall HMIS to ensure it runs effectively and efficiently. This section is used to assist the CoC in ensuring the HMIS Administration team is maintaining a high level of system set-up data quality to ensure accurate reporting on behalf of the CoC.

The DQP is an evolving tool that will change as the community and its HMIS data needs change. It is intended to be updated annually by the PIC Data Committee, taking into account changes to HUD's HMIS Data and Technical Standards, data entry procedures set forth via PIC, needs of varying stakeholders, and enhancements to CoC performance plans.

**\*See the Data Quality Plan (DQP) for full details.**

### **Data Quality Plan**

## **HMIS Security and Privacy Plan**

### ***A. Introduction and Background***

This HMIS Security and Privacy Plan (SPP) describes standards for the privacy and security of personal client information collected and stored in the HMIS. The SPP seeks to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data. The standards set forth in this SPP are based on principles recognized by information privacy and technology communities.

The SPP provides a framework that mirrors many of the technical standards from the 2004 HUD HMIS Data and Technical Standards, while supplementing that documentation with specific policies that have been developed and implemented throughout the State of Hawaii, and action steps that all organizations utilizing the HMIS are expected to apply. The SPP outlines baseline standards that will be required by any organization that records, uses, or processes protected personal information (PPI) on homeless clients for an HMIS. The SPP strives to reference procedures that organizations and stakeholders can utilize to enhance the privacy and security of information collected through the HMIS.

Throughout the SPP, baseline standards for evaluating privacy and security requirements will be established. At a minimum, all organizations that record, use, or process PPI on homeless clients must meet these baseline privacy and security requirements. This approach provides a standard level of protection for homeless clients and allows for the possibility of additional protections for organizations with additional needs and resources.

### ***B. HMIS Privacy Standards***

The goal of the HMIS Privacy Standards is to ensure that all required client data will be entered in the PIC HMIS while maintaining the confidentiality and security of the data in conformity with all current regulations related to the client's rights for privacy and data confidentiality.

### ***C. HMIS Security Standards***

The goal of the HMIS Security Standards is to ensure that HMIS data are collected, used, and always maintained in a confidential and secure environment. The HMIS Security Standards applies to the HMIS Administration Team, Contributing Homeless Organizations (CHO's), and the overall HMIS software solution. Specific applicability is described in each policy within these security standards. These standards apply to all PPI collected in the HMIS or uploaded through comparable databases.

The CoC recognizes that organizations may have established their own security policies that meet the HUD security requirements and minimum standards set forth below. The purpose of this document is to outline those standards to all CHOs and define the parameters of compliance with these standards. This document is not intended to supplant individual CHO security policies, but rather to supplement them. As long as CHO policies and practices meet the minimum thresholds established in this plan, they may establish additional or more stringent security requirements. Another key purpose of this document is to describe how Partners in Care will meet and maintain security requirements established in HUD's security standards.

#### ***D. HMIS Security and Privacy Plan Contents***

The HMIS Security and Privacy Plan is a separate document that details the following topics.

1. The HMIS Privacy Notice and Policy\*
2. HMIS Client Consent Form\*
3. Offsite Data Entry
4. Presumed Client Competence
5. Denial of Services
6. Workstation Privacy
7. Password Privacy Requirements
8. HMIS Data Sharing
9. Client Access to their Records
10. Client Grievance Process
11. Research Agreements
12. Data Request Form\*
13. Levels of User Access and Security
14. Security Incident Procedure
15. Audit and Access Controls
16. Personnel Authentication and Password Protocols
17. Malware and Virus Protection with Auto Update
18. Disaster Protection and Recovery
19. Hardware/Software Management and Physical Safeguards
20. Wireless Transmission Security
21. Contributing Homeless Organization

\*Documents can be found in Appendix of these Policies and Procedures

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**A. Agency Participation Agreement**

[Click here: Agency Participation Agreement](#)

**B. HMIS Training Policies and Access Requirements**

[Click here: HMIS Training Policies and Access Requirements](#)

**C. New Agency Access Request**

Date of Request: \_\_\_\_\_

**Organization Requesting Access**

**Organization Name (include branch, division, department, etc.):**

\_\_\_\_\_

**Associated Programs**

\_\_\_\_\_

**Street Address or P.O. Box:**

\_\_\_\_\_

**City/State/Zip Code:**

\_\_\_\_\_

**Telephone (include area code):**

\_\_\_\_\_

**E-mail:** \_\_\_\_\_

**Rationale for requesting access:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Mission of Organization and Associated Programs:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Services provided by Organization and Associated Programs:**

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Number of individuals or families experiencing homelessness that are served annually \_\_\_\_\_

Number of users needing access \_\_\_\_\_

Describe how access to HMIS or the Coordinated Entry System will benefit clients experiencing homelessness (assessing clients, referring clients, getting clients document ready, involvement in case conferencing, and navigation through the housing program)

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**Submitted by:**

---

(Name)

---

(Title)

Data Committee Recommendation: \_\_\_\_\_

Date of Recommendation: \_\_\_\_\_

Data Committee Chair Signature: \_\_\_\_\_

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## **D. PIC Community Membership Application**

[Click here: PIC Community Membership Application](#)

## E. Oahu HMIS User Agreement Form

### OAHU HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) USER AGREEMENT

(Please type or clearly print all information)

User's Full Name:

---

Agency Name:

---

User's Email Address:

---

Zip Code of User's Employment Location:

---

Access Requested (circle all that apply): Case Management / VI SPDAT / Agency Admin

READ-ONLY Access to the role(s) indicated above is requested.

*\*See back of page for a description of each role*

#### **Statement of Confidentiality:**

Staff, volunteers, and any other persons with access to the Homeless Management Information System (HMIS) are subject to certain guidelines regarding its use. HMIS contains a wide range of personal and private information on individuals, and all such information must be treated carefully and professionally by all who access it.

Guidelines for use of HMIS include:

- Personal User Identification and Passwords must be kept secure and are not to be shared.
- Informed client or guardian consent, as documented by a current Authorization to Release form, is required before entering, updating, editing, printing, or disclosing basic identifying information via the HMIS.
- Informed client or guardian consent, as documented by a current Authorization for Release of Information with a HMIS clause, is required before entering, updating, editing, printing, or disclosing information beyond basic identifying non-confidential information.
- Confidential information obtained from the HMIS is to remain confidential, even if my relationship with my employer changes or concludes for any reason.
- Only individuals that exist as clients under the Agency jurisdiction may be entered into the HMIS.
- Misrepresentation of the client base by entering known, inaccurate information is prohibited.

- Discriminatory comments based on race, color, religion, national origin, ancestry, handicap, age, sex, and sexual orientation are not permitted in the HMIS. Profanity and offensive language are not permitted in the HMIS.
- The HMIS is to be used for business purposes only. Transmission of material in violation of any United States Federal or State of Hawaii regulations or laws is prohibited and includes material that is copyrighted, legally judged to be threatening or obscene, and considered protected by trade secret. The HMIS will not be used to defraud the Federal, State, or local government or any individual entity or to conduct any illegal activity.
- Any unauthorized access or modification to computer system information or interference with normal system operations will result in immediate suspension of your access to the HMIS.

Your signature below indicates your agreement to comply with this statement of confidentiality. Submit a completed agreement to Partners In Care (PIC) at [hmis@partnersincareoahu.org](mailto:hmis@partnersincareoahu.org) and attend training to receive HMIS login credentials.

*Employee:*

*Executive Director:*

*Signature:* \_\_\_\_\_ *Date:* \_\_\_\_\_ *Signature:* \_\_\_\_\_  
*Date:* \_\_\_\_\_

*Printed name:* \_\_\_\_\_ *Date:* \_\_\_\_\_ *Printed name:* \_\_\_\_\_  
*Date:* \_\_\_\_\_

HMIS User Agreement Forms for current employees and those no longer employed by the Agency should be kept on file for seven years at the agency and with the HMIS Administration Team.



Case Management – A customized role for entering client demographics, enrolling clients in or exiting them from programs, and editing client records. Users with this role are able to view enrollment history for all clients in the CoC if the client has elected to share their data. Users of this role have access to the Agency Data Quality report for their organization.

VI SPDAT – A customized role For entering and viewing VI SPDAT assessments and receiving/processing CES referrals.

Agency Admin – A customized role for running program- and agency-level reports specific to an organization, changing a client’s consent to share, and viewing client records. All reports are based on information entered via HUD and VI SPDAT assessments.

READ ONLY ACCESS – Users with read-only access can view the data available from the roles above, but are not able to enter or edit any information.

## F. Authorized Point of Contact Form

### Authorized Point of Contact

Use this form to identify at least one Point of Contact for your agency. The Executive Director may be the POC.

**Agency Name:** \_\_\_\_\_

#### **Point of Contact**

Staff Name: \_\_\_\_\_ Email: \_\_\_\_\_

Signature: \_\_\_\_\_ Position: \_\_\_\_\_

#### **Point of Contact**

Staff Name: \_\_\_\_\_ Email: \_\_\_\_\_

Signature: \_\_\_\_\_ Position: \_\_\_\_\_

#### **Point of Contact**

Staff Name: \_\_\_\_\_ Email: \_\_\_\_\_

Signature: \_\_\_\_\_ Position: \_\_\_\_\_

#### **Executive Director:**

**Your signature authorizes the staff member(s) listed above to fulfill the duties outlined in the HMIS Training Policies and Access Requirements document.**

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_

**G. CoC Monitoring of the HMIS Lead Survey**  
*(In development 8/24/2021)*

## H. HMIS Data Quality Monitoring Visit Report Tool

### DATA QUALITY MONITORING VISIT REPORT

Date of Monitoring Visit: \_\_\_\_\_

Person Conducting Monitoring:

\_\_\_\_\_

Name of Organization:

\_\_\_\_\_

Organization Contact and Information:

\_\_\_\_\_

Name of Project and Type of Project Monitored:

\_\_\_\_\_

Organization Staff Present During Monitoring

--

**Each baseline and expectation met below accounts for 20 points for a total of 100 or 120 possible points, depending on project type.**

**Client Duplication Goal:  $\geq 17$  points**

**Project's score:** \_\_\_\_ **Baseline Met?** \_\_\_\_ Yes \_\_\_\_ No

Scoring Guide:

**Data Completeness Goal:  $\geq 17$  points**

**Project's score:** \_\_\_\_ **Baseline Met?** \_\_\_\_ Yes \_\_\_\_ No

Scoring Guide:

See chart for project-specific targets

Start with 25 points. Projects that are within identified targets for all measures will earn all 25 points. Deduct one point for each percentage a project exceeds an identified target. For example, if the target for missing SSN data is 1%, and the project is missing 3% of SSNs, deduct 2 points from the total.

**Data Timeliness Goal: >=20 points**

**Project's score:** \_\_\_\_ **Baseline Met?** \_\_\_\_ **Yes** \_\_\_\_ **No**

Scoring Guide:

Percent of data entered within 72 hours and corresponding point totals

100% = 25 pts	70-79% = 19	40-49% = 13	10-19% = 7
90-99% = 23 pts	60-69% = 17	30-39% = 11	0-9%
80-89% = 21	50-59% = 15	20-29% = 9	

**Data Accuracy Goal: >= 20**

**Project's score:** \_\_\_\_ **Baseline Met?** \_\_\_\_ **Yes** \_\_\_\_ **No**

Scoring guide

**Data Consistency expectation met?** \_\_\_\_ **Yes** \_\_\_\_ **No**

Scoring guide

**Coverage & Utilization expectation met?** \_\_\_\_ **Yes** \_\_\_\_ **No** \_\_\_\_ **Not applicable**

Scoring guide

**Total Score:** \_\_\_\_\_

**Possible Score:** \_\_\_\_\_

Each item in the “observed” column accounts for 20 points for a total of 100 allowable points. The combined total of the total score in the section above and the total score in the section below results in the specific project’s monitoring visit score.

Projects with scores between 85 – 100 will be determined as “exceeding expectations”.

Projects with scores between 70 – 84 will be determined as “meeting expectations”.

Projects with scores between 55 – 69 will be determined as “below expectations”.

Projects with scores below 55 will be determined as “severely at-risk”.

For those in the “outcome” column defined as “Action Needed”, the “Notes” section must include action steps with specific timelines.

Requirement	Observed	Outcome	Notes
<b>Data Collection &amp; Quality</b>	_____	The project has not required the use of a Data Quality Improvement Plan to address data quality issues since the last monitoring visit	_____ Action Needed  _____ In Compliance
	_____	The organization documents the homeless status of clients served, as well as any other eligibility criteria for the project	
	_____	Intake workers and HMIS users understand the required data elements and how to present them to clients in a way to get accurate information	
	_____	The organization’s paper intake forms, if applicable, include all data elements required to be entered into HMIS	
	_____	Random selection of client files show complete data collection process and match data entry in HMIS	

**Upon completion of monitoring visit**

Data Quality Improvement Plan Needed? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, has plan been created? \_\_\_\_\_ Yes \_\_\_\_\_ No

Notes

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Person completing monitoring visit signature

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Date

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Monitored organization staff member signature

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Date

# I. Data Quality Improvement Plan

## DATA QUALITY IMPROVEMENT PLAN

Date of Data Quality Improvement Plan (DQIP) Implementation: \_\_\_\_\_

Name of Organization:

\_\_\_\_\_

Organization Contact and Information:

\_\_\_\_\_

Name of Project(s) Included in DQIP

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Organization Staff Responsible for DQIP:

_____	_____
Staff Person	Role

_____	_____
Staff Person	Role

_____	_____
Staff Person	Role

HMIS Lead Staff Responsible for DQIP:

_____	_____
Staff Person	Role

_____	_____
Staff Person	Role



CoC Staff Responsible for DQIP:

Staff Person	Role
Staff Person	Role

Issue	Baseline Not Currently Being Met	How to Address	How Often and who is responsible	Date Completed
[Example] Destination data completeness rate an issue for three consecutive reporting periods	Destination data completeness less than 95% (includes “no exit interview completed” responses)	In-person meeting with agency, HMIS Lead, and CoC to discuss what’s happening “in real life” and “real world” implications of poor destination data completeness rates	Initially – ongoing, if needed (Agency, HMIS Lead, CoC)	
		Review paper intake / exit assessments to ensure necessary data elements are included on the forms	Initially (Agency, with input from HMIS Lead as needed)	
		Provide refresher training to HMIS users to ensure data entry for destination data is completed accurately	Ongoing, if needed (HMIS Lead)	
		Run data completeness report every two weeks	Ongoing (Agency and HMIS Lead)	

		Increase in destination data completeness for at least three consecutive months	Ongoing (Agency and HMIS Lead)	

**Additional Narrative:**

If the Organization does not remain communicative and interactive with the HMIS Lead to address the issue by following through with the above steps, the CoC will consider this DQIP in default and will use incentives and enforcements available, including a loss of supports and dollars currently provided to the Organization.

**Acknowledgement and Acceptance of Data Quality Improvement Plan**

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Program Manager/Organization Executive Director

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HMIS Lead Manager/Director

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Date

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Date

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CoC Manager/Director

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Date

## J. Privacy & Security Certification Checklist for Contributing HMIS Organizations (CHO)

All new and continuing CHOs must comply with the following privacy and security certifications annually. All CHOs will be monitored by the CoC according to the following checklist at least once every two years.

Section	Policy Requirement	Meets Requirement (Y/N)	If No, date when will be met
III.A	Posted HMIS privacy Notice at all CHO workstations or where data collection occurs and the HMIS Privacy Policy is available upon request.		
III.B	CHOs have the most current HMIS client consent form. Sampled clients entered into the HMIS have a valid consent form. The consent and intake information are kept in a secure location.		
III.G	Screens where HMIS data entry occurs are placed in a manner making it difficult to oversee information being entered.		
	User login and password information are not left out in the open.		
	Locking screensavers (Five Minutes) are functional at HMIS workstations.		
III.H	CHO follows the HMIS security policy for deactivating personnel within 24 hours of the end of their employment and communicate this change with the HMIS Administration Team.		
III.I	CHO follow the HMIS policy for sharing data via the HMIS. Clients sampled for which data sharing is checked in the HMIS contain appropriate consent forms.		
III.J	CHO follows the HMIS privacy policy that contains wording expressing client's right to receive a copy of their information entered into the HMIS.		
III.K	CHO follows the HMIS security plan for grievances associated with violations of privacy rights regarding HMIS participation. A formal CoC grievance process has been established and utilized.		
IV.A	CHO follows the HMIS security plan details organizational control and accounting of active HMIS users. Point(s) of contact have been established to communicate with the HMIS Lead and HMIS Administration Team.		
IV.B	CHO follows the HMIS security plan that addresses measures for dealing with suspected or actual HMIS security breaches.		
IV.E	Public workstations with access to the HMIS must have security measures such as locking screensavers or program staff monitoring.		
IV.F	CHO workstations must have malware and virus protections with auto updates.		
IV.H	Physical safeguards for protection of HMIS data must be in place at the organizational and administrative levels.		

IV.I	CHO must follow the HMIS security and privacy policies regarding the transmittal of PPI and user login and password information via email.		
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## K. Public Privacy Policy

### PRIVACY POLICY

**THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN OBTAIN ACCESS TO THAT INFORMATION.**

**PLEASE READ IT CAREFULLY**

Effective Date: \_\_\_\_\_

#### **Our Duty to Safeguard your Personally Protected Information (PPI):**

\_\_\_\_\_ (Agency Name) collects information about which clients utilize services that we provide. We will ask for your permission to share the information we collect about you and your family (as applicable) into a program called the HMIS. Although the HMIS helps us keep track of your information, individually identifiable information about you is considered “Personally Protected Information”. We are required to protect the privacy of your identifying information and to give you notice about how, when and why we may use or disclose the information.

We are required to follow the privacy practices described in this Notice, although the Partners In Care Data Committee is responsible for updating this Privacy Policy annually and can make changes at any time. (Agency Name) \_\_\_\_\_ may have additional privacy protocols internal to the agency and may change their privacy protocols at any time. As a client you have the right to request the most up to date privacy policy from \_\_\_\_\_ (Agency Name)

This policy may be amended at any time and those amendments may affect information obtained by the CHO before the date of change. An amendment to the privacy notice regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated.

#### **How We May Use and Disclose Your Information:**

We use and disclose collective information for a variety of reports. We have a limited right to include some of your information for reports on homelessness and services needed by those who are homeless. Information that could be used to identify you will never be used for these reports. If you are enrolled in the Supportive Services for Veteran Families (SSVF) Program, your information will be shared as mandated by the Department of Veteran Affairs.

We may use your information in approved research requests. We must have your written consent to use or disclose your information unless the law permits or requires us to make the use or disclosure without your permission. Please review the client consent form for further details.

#### **Your Rights Regarding Your Information:**

- You have the right to receive services even if you choose NOT to participate in the Oahu HMIS. However, clients may be refused program entry for not meeting other agency eligibility criteria.
- You have the right to ask for information about who has seen your information.
- You have the right to view your information and change it, if it is not correct.

#### **L. Privacy Notice (Posted Sign)**

### **Partners in Care CoC Homeless Management Information System (HMIS) Mandatory Collection Notice**

We collect personal information directly from you for reasons that are discussed in the HMIS privacy policy. We may be required to collect some personal information as mandated by law or as requested from organizations that fund this program. Other personal information we collect is necessary to operate programs, improve services, and better understand the needs of homelessness. We collect appropriate information only. The HMIS Privacy Policy is available upon request.

## M. HMIS Client Consent Form

**ISLAND OF OAHU, CITY AND COUNTY OF HONOLULU, HOMELESS MANAGEMENT  
INFORMATION SYSTEM (HMIS)  
CLIENT INFORMED CONSENT FOR RELEASE OF INFORMATION  
(ONE FORM PER ADULT CLIENT OR UNACCOMPANIED YOUTH UNDER 18 WITH  
PARENT OR GUARDIAN CONSENT)**

\_\_\_\_\_ is an Authorized Agency in Oahu's Homeless Management Information System (HMIS) and Coordinated Entry System (CES). The HMIS and CES are shared homeless and housing database systems used by homeless service providers on the Island of Oahu. **The HMIS and CES improve the ability for you to achieve housing by allowing providers authorized to serve you to share your information.** The shared information is used to identify your unique needs and to allow for coordination among different service providers to more efficiently serve you. Sharing your information reduces the need to be asked the same questions repeatedly and may result in faster, more personalized services. The HMIS operates over the Internet and uses many security protections to ensure confidentiality. Additionally, your information is protected by federal HMIS Privacy and Security Standards.

As you receive services, information will be collected from you about the services provided to you, and the differences made as a result of these services.

- Only Authorized Agencies will have access to your information. A list of Authorized Agencies is available upon request. Contact [hmis@partnersincareoahu.org](mailto:hmis@partnersincareoahu.org) for a current list.
- Other approved organizations may receive access to information for reporting or research purposes allowed by law (i.e. court order) and approved by Continuum of Care's Data Committee. The general public will NEVER have access to your information. Please review the Privacy Notice for more details.
- Basic information to be shared by Authorized Agencies through this consent includes, but is not limited to: name, age, gender, race, ethnicity, family members, marital status, any history of domestic violence, housing history, disabling conditions (Physical Disability, Chronic Health Condition, Mental Health, Substance Abuse and HIV/AIDS), VI-SPDAT survey data, program intake dates, encounter dates, program discharge dates, employment status, income and non-cash benefits, health insurance, case notes, eligibility documents, and housing plan.
- If you do not provide consent, you will still receive services; however access to housing options may be limited.
- Allowing your information to be shared with Authorized Agencies includes all prior episodes of homelessness currently in the HMIS and information of all dependents (children under age 18) if applicable.

I give consent for my name and other relevant identifying information to be shared among Authorized Agencies.

I understand that this consent is valid for three years from the date of my signature below and that I may cancel at any time by written request.

Print Name of Client	Signature of Client OR Parent/Guardian	Date
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Print Name of Agency Staff	Signature of Agency Staff	Date
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Once the HMIS Client Consent Form is completed the form must be uploaded into HMIS and filed at the Agency for seven years.

## **N. Data Request Form**

<https://www.partnersincareoahu.org/requests-data>