HOMELESS MANAGEMENT AND INFORMATION SYSTEM POLICIES & PROCEDURES

MA-511 Quincy/Brockton/Weymouth/Plymouth City and County Continuum of Care

Also known as: South Shore Regional Network or South Shore CoC

June 2022

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This document provides the framework for the ongoing operations of the Quincy/Brockton/Weymouth/Plymouth City and County Continuum of Care's Homeless Information Management System (HMIS). This entity is referred to locally as the South Shore Regional Network to End Homelessness (or the South Shore Network) and this system will be called the South Shore Regional Network HMIS going forward.

1. PROJECT OVERVIEW

Purpose and Mission:
The purpose of the Continuum of Care's Homeless Management Information System (HMIS) is to provide a comprehensive system for collecting and disseminating information about persons experiencing homelessness and the homelessness service system in the South Shore Regional Network. The long-term vision of HMIS is to enhance partner agencies' collaboration, service delivery and data collection capabilities and to improve the region's planning and advocacy based on good data.

The mission of the CoC's HMIS system is to help the region to better address and end homelessness through a regional database that collects, tracks, and reports uniform information about the demographics, needs, services, and outcomes for the program participants served. Accurate information will put the South Shore Regional Network in a better position to plan for future needs and to meet the reporting requirements of the U.S. Department of Housing and Urban Development (HUD). This system, therefore, is intended both to meet Federal requirements and to enhance regional service planning and delivery.

CoC HMIS System and Reporting:
The CoC HMIS is a combination of two HMIS systems.
1) The Commonwealth of MA/DHCD system: The family emergency shelter providers' data are aggregated centrally in the Massachusetts HMIS System, ASIST (All Service Integrated System Tracker).
2) The Father Bill's & MainSpring (FBMS) HMIS system: This system is used by FBMS and by other regional partners for programs of individual emergency shelter, rapid rehousing, permanent supportive housing, and other supportive services.

Each of the agencies participating in the Continuum of Care input directly to the Massachusetts HMIS system (ASIST) or to the FBMS HMIS system. Any agency participating in the CoC that seeks funding from HUD CoC or ESG will be required to participate in the CoC HMIS system through one of the above two systems, either by direct input or by uploading to the system. Any agency seeking other funding to serve homeless persons may be required to participate in the CoC HMIS based on federal or state funder requirements. All agencies serving homeless persons in the CoC, regardless of their funding source, are strongly encouraged to participate in the CoC HMIS system to help provide for comprehensive regional homelessness data.

Data that is gathered via intake interviews and program participation will be used to complete the following HUD reports:
- Annual Progress Reports (APRs),
- Longitudinal Systems Analysis (LSA),
- Systems Performance Measures (SPM),
- Point in Time Count (PIT) and

- Housing Inventory Chart (HIC).

These data may also be analyzed to provide unduplicated counts and anonymous aggregate data reports for various stakeholders in the Continuum of Care.

Benefits of HMIS include:
- Improved service coordination when information is shared among case management staff within one agency or with staff in other agencies (with written program participant consent) who are serving the same program participants;
- Aggregated information that can be used to develop a more complete understanding of program participants' 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;
- Capacity to generate HUD Annual Performance Reports (APRs) for HUD CoC programs and other HUD reports such as the LSA, SPM, HIC and PIT;
- Aggregated information that will assist in identification of gaps in services, as well as the completion of other reports used to inform policy decisions aimed at addressing and ending homelessness at the regional, state and federal levels.

2. GOVERNING PRINCIPLES

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

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

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

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

System Availability
The availability of centralized data repositories is necessary to achieve the ultimate region wide aggregation of unduplicated homeless statistics. HMIS Project staff is responsible for ensuring the broadest deployment and availability for homeless service agencies in the CoC.

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

3. ROLES AND RESPONSIBILITIES

Quincy/Brockton/Weymouth/Plymouth City and County Continuum of Care – South Shore Regional Network

CoC HMIS Committee
- Project direction and guidance
- Quarterly review of HMIS data quality
- Annual review of project level and program participant level data files to ensure adherence to HUD Data Standards
- Annual review of compliance with HMIS data quality, security, and confidentiality standards

HMIS Vendor Contract Liaison - State of Massachusetts Department of Housing and Community Development (DHCD)
As the administrator of the Efforts to Outcomes ASIST HMIS, DHCD shall serve as the contract liaison with the HMIS Software vendor, Social Solutions for Emergency Assistance family shelter programs. DHCD representatives will provide assistance with agency, program and end user set up, and serve in a triage role for any requests for enhancements. For all other program types, Father Bill's & MainSpring will serve as the contract liaison with the HMIS Software vendor.

HMIS Lead Agency: The City of Quincy
The City of Quincy is the HMIS Lead. As HMIS Lead, it is designated by the CoC to operate the region's HMIS on its behalf. It will also apply for HMIS funds on behalf of the CoC in order to operate the HMIS and for other costs eligible under the CoC Program Regulations (578.57). Additionally, the HMIS Lead is also responsible for selecting the HMIS Administrator.

HMIS Administrator: Father Bill's & MainSpring
Father Bill's & MainSpring (FBMS) is the HMIS administrator and will:
- Coordinate the annual homeless Point-in-Time count and submit the census count to HUD.
- Update of the Housing Inventory Chart and submit the data to HUD.
- Complete the Longitudinal Systems Analysis (LSA) and submit to HUD.
- Complete the annual Systems Performance Measures report (SPM) and submit to HUD.
- Provide technical assistance to all HMIS participating agencies with HMIS data collection.
- Lead efforts by the Network to gather and analyze regional homeless data.
- Upload HMIS data into the statewide data warehouse, the Rehousing Data Collaborative, managed by the Department of Housing and Community Development.
- Inform HMIS vendors of issues that are impacting their adherence to the HUD Data Standards
- Perform ongoing data quality monitoring services and alert Partner Agency(s) and HMIS Lead Agency of data quality issues that will potentially impact Federal reporting.
- Data validity checking
- Provide technical tools to assist with conducting the regional HUD Point In Time Count and gathering of the data from both shelters and the street counts to create the final report.

- Represent the CoC at New England Regional HMIS (NERHMIS) and Massachusetts HMIS Steering Committee meetings.

HMIS Software Vendor: Social Solutions Inc.
- Host and maintain a secure Homeless Management Information System for the following agencies within the MA-HMIS and FBMS enterprises:
  - **MA-HMIS (ETO ASIST)**
    - Developmental Disabilities Inc.
    - Father Bill's & MainSpring
    - Friends of the Homeless of the South Shore
    - NeighborWorks Housing Solutions
    - Old Colony YMCA
    - Plymouth Coalition for the Homeless

  - **FBMS:**
    - Father Bill's & MainSpring
    - The following agencies use the FBMS enterprise solely to enter Coordinated Entry assessment data:
      - Developmental Disabilities Inc.
      - Friends of the Homeless of the South Shore
      - NeighborWorks Housing Solutions
      - Old Colony YMCA
      - Plymouth Coalition for the Homeless

- Provide data in either the HUD Comma Separated Variable (CSV) or HUD Extensible Markup Language (XML) format. Data will ideally be posted to a secure FTP staging area. If this is not done then it is the responsibility of the Partner Agency to post HMIS data prior to any reporting deadlines. See Partner Agency responsibilities listed below.
- Respond to HMIS support related requests in accordance to the Service Level Agreement (SLA) established between the HMIS Software Vendor and the HMIS Vendor Contract Liaison.

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

Partner Agency Senior Leadership
- Authorizing agent for Participating Agency Agreement
- Designation of HMIS Agency Point Person
- Agency compliance with HMIS Policies & Procedures

- Each Partner Agency is responsible for ensuring they meet the Privacy and Security requirements detailed in the HUD HMIS Data and Technical Standards. Annually, Partner Agencies will conduct a thorough review of internal policies and procedures regarding HMIS.

Partner Agency Point Person

Each Partner Agency will designate an HMIS Agency Point Person to serve as primary contact between the CoC HMIS Administrator and the Partner Agency, and send that person's name and contact information to HMIS Project Staff. Changes to that information should be promptly reported to the CoC HMIS Administrator.

The HMIS Agency Point Person is responsible for:

- Program compliance with HMIS Policies & Procedures
- Authorizing agent for Partner Agency User Agreements
- Keeper of Executed Program participant Informed Consent forms
- Authorizing Agent for User ID requests
- Staff workstations
- Internet connectivity
- End user adherence to workstation security policies
- Detecting and responding to violations of the HMIS Policies & Procedures
- First level end user support
- Maintain agency/program data in HMIS application
- Authorizing agent for Data Quality Monitoring
- Share data with the CoC HMIS Administrator, and if necessary, give DHCD permission to share data with the Administrator. All data to be reported over must be submitted no later than thirty (30) days prior to the Federal reporting deadline. This responsibility can be deferred to the HMIS Software Vendor if the HMIS Software Vendor is capable of posting data on a nightly basis to the secure FTP staging area established by Data Analysts. This responsibility can also be deferred to the HMIS Administrator through granting formal permission to access partner agency data directly.

Agency Staff

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

4. OPERATING PROCEDURES

1. Security and CoC HMIS Access

Massachusetts Department of Housing and Community Development (DHCD) hosts the Efforts to Outcomes (ETO) ASIST HMIS software for all Emergency Shelter Family programs. All other program types will be maintained through the HMIS Administrator's instance of ETO or another comparable HMIS system. Each Agency is responsible for providing and maintaining computer hardware and Internet service. Each administrative staff or end user that a participating agency determines will have access to ETO ASIST via direct entry will be issued a user license (login ID and password) once the initial training is complete and the ETO Participating Agency User Agreement Form has been signed.

(a) End User Accounts

DHCD will provide an End User Account username and initial password to each authorized End User once the initial HMIS training has been completed and the ETO Participating Agency user Agreement Form has been signed for EA family shelter programs. The HMIS Administrator will provide these accounts for any program within the FBMS ETO Enterprise, including Coordinated Entry. End User Accounts are assigned on a per-person basis, rather than to a particular position or role. End User Accounts are not to be exchanged, shared, or transferred between personnel at any time. Sharing of End User Accounts is a breach of these Policies and Procedures and a violation of the Participating Agency Agreement and the Participating Agency User Agreement Form.

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

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

(b) End User Inactivity

End Users who have not logged into the system in the previous 60 days for the FBMS HMIS and in the previous 90 days for the MAHMIS will be flagged as inactive. Inactive End Users may have their ETO accounts locked or removed to maintain the security, confidentiality, and integrity of the system.

(c) User Access Levels

The Partner Agency shall designate one User to be the Site Manager, identify and approve their respective users. The level will be based on each user's job function as it relates to the ETO

Software's data entry and retrieval schema. HMIS Project Staff will aid in the determination of HMIS User access level when requested.

(d) Passwords

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

(e) Connectivity and Computer Systems

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

(f) Workstation Security

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

- Password-protected log on for the workstation itself;
- Password-protected (aka locked) screensaver after five minutes or more of inactivity;
- Operating system updated with manufacturer's latest patches at least weekly;
- Ports firewalled;
- Using Internet Explorer v.10 to connect to HMIS
- Systems scanned at least weekly for viruses and malware.

(g) Local Data Storage and Transfer

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

(h) Remote System Access

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

(i) Program participant Access to Records

Program participants may not be denied access to their own records. Program participants have the right to see their information contained in HMIS. If a Program participant requests, the Participant/User must review the information with the program participant.

(j) Training

Each agency will provide training on its own software system. FBMS, and DHCD, will provide support on HUD data standards and CoC expectations for data quality, confidentiality, security, entry/exit dates, and documentation of linkage to mainstream resources, and outcome tracking.

DHCD provides quarterly training on ASIST software. In its role as HMIS Administrator, FBMS shall maintain regular contact with DHCD and inform all partners of the dates, times, and availability of any DHCD-sponsored training opportunities.

2. Data Collection and Entry

(a) Standard Data Collection

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

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

Although each participant will use the HMIS in various capacities, the minimum data fields required for all providers regardless of funding source are detailed in Table A below. HUD has mandated these universal data elements for all program participants entered into a HMIS. For providers receiving HUD CoC funding (including ESG) there are additional program specific data elements which are detailed in Table B. Please refer to the HMIS Data Standards, May 2019, version 1.1, for more information on data elements required by HUD. Other Local Data Elements (LDE) and data collection protocols will be set by the HMIS Lead Agency as-needed for adequate data analysis and meeting objectives of local plans.

Table A: Universal Data Elements

Protected Personal Information – PPI – is collected for programs that are required to report to HUD and other organizations. Other agencies without this reporting requirement may also collect these elements to facilitate a better understanding of the homeless population. The submission of PPI follows the Governing Principles outlined on page 5 of this document.

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

1. Name
2. Social Security Number
3. Date of Birth
4. Race
5. Ethnicity
6. Gender
7. Veteran Status
8. Disabling Condition

9. Project Start Date
10. Project Exit Date
11. Destination
12. Relationship to Head of Household

13. Client Location
14. Housing Move-In Date
15. Prior Living Situation

Table B: Program Specific Data Elements for HUD CoC Funded Users
1. Income and Sources
2. Non-Cash Benefits
3. Health Insurance
4. Physical Disability
5. Developmental Disability
6. Chronic Health Condition

7. HIV/AIDS
8. Mental Health Problem
9. Substance Abuse
10. Domestic Violence
11. Current Living Situation
12. Date of Engagement
13. Bed-Night Date
14. Coordinated Entry Assessment
15. Coordinated Entry Event

Service and Shelter Records include Bed Register and customized service fields. All participants who are entered into an ES, SO, TH, RRH, or PSH program will have a HUD Intake Assessment completed for each member of that household. The HUD Intake Assessment in ETO contains all of the data fields necessary to complete the HUD APR and other required reports. After the participant or family leaves the program all members of the household will receive a HUD Exit Assessment as well as a dismissal date from the program in question. For participants in an individual shelter, any participant who has not stayed in the shelter for 30+ days will be dismissed by the program staff following the procedure outlined above. The HMIS Administrator can provide information on how to obtain this information through the HMIS system.

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

(b) Informed Program participant Consent
Partner Agencies will collect and retain signed program participant consent forms before any program participant data will be entered into the CoC HMIS and DHCD ASIST ETO. Partner Agency staff will thoroughly explain the program participant consent to each program participant. If program participant consent is not obtained, the Partner Agency will enter the de-identified data into an anonymous program participant record that is minimally necessary for the purposes of tracking of units of service. Possible uses and disclosures are listed in the release. Program participants cannot be denied services if consent to data collection is not given.

(c) Appropriate Data Collection
HMIS End Users will only collect, enter or access Program participants in the HMIS that exist as Program participants under the User's area of service. End Users will only collect data relevant to the delivery of services to people experiencing a housing crisis in the Quincy/Brockton/Weymouth/Plymouth City and County CoC.

(d) Data Element Customization

Data element customization will be provided as needed, e.g. special projects such as preventive homeless prevention projects or other customized assessments in which the HMIS database is used for this data collection.

3. Quality Assurance

(a) Commitment to Data Quality

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

(b) Data Element Completion

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

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

(c) Data Integrity Expectations and Support

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

- Data will be entered in a timely manner, within 3 working days following program participant contact.
- The HMIS Committee will monitor HMIS Data Quality at least quarterly to ensure the accuracy and completeness of project level data. If an issue is found with data quality at a specific agency, the agency will receive a corrective action plan and additional monitoring will be conducted to ensure that improvements have been made.
- When staff entering into the HMIS turn over, the Partner Agency is expected to provide adequate training on data quality, security, entry/exit dates, and confidentiality and to notify the HMIS Administrator so it can provide data quality reports and supplemental training as necessary to ensure that new staff are entering complete and accurate program data. The HMIS Administrator will develop a Data Quality Monitoring Plan that will define expectations for timeliness, accuracy and completeness of data, and establish timelines for monthly data quality monitoring.

4. Data Retrieval

(a) Partner Agencies

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

(b) HMIS Vendor--Social Solutions, Inc.
The HMIS Vendor, Social Solutions has agreed to not access the system except for purposes of software maintenance, troubleshooting, and data conversion.

(c) Program participant
Any program participant will have access to view, or keep a printed copy of, his or her own records contained in the HMIS within a reasonable period of time. No program participant shall have access to another program participant's records in the HMIS.

(d) Continuum of Care
The HMIS Administrator will provide de-identified and aggregate reports to the Continuum of Care as-needed in support of its mission to prevent, reduce, and eliminate homelessness.

(e) Public
The HMIS Administrator will address all requests for data from entities other than Partner Agencies or program participants. No program participant-level data will be provided to any party, even a program participant requesting their own data, unless the Partner Agency who entered the data is unable to satisfy the program participant's request. All requests from the public for HMIS reports must be made in writing. HMIS Project Staff will compile and publish certain periodic reports for public consumption regarding homelessness and housing issues in the region on data available in HMIS. This information will be made available to local city planners for the completion of the Consolidated Plan. At no time will published, publicly-available reports contain program participant-level or identifiable data.

(f) Ethical Data Use
Data contained in the HMIS will only be used to support the delivery of homeless and housing services in the Quincy/Brockton/Weymouth/Plymouth City and County CoC. Each HMIS End User will affirm the principles of ethical data use and program participant confidentiality contained in this Policies and Procedures Manual and the *HMIS End User Agreement*.

(g) Access to Core Database
No one will have direct access to the ETO database. Access is provided solely through the Social Solutions ETO software.

5. Glossary of Terms

- **Continuum of Care (CoC) Executive Committee** – The primary decision-making entity of the CoC.

- **Continuum of Care (CoC) Lead** – The entity that submits the annual CoC Application to HUD on behalf of the Continuum of Care.

- **Contributing HMIS Organization (CHO)** – Organization that operates a contributing homeless assistance program and/or a contributing non-homeless assistance program.

- **Contributing Program** – A program, operated by a CHO that contributes Protected Personal Information (PPI) or other program participant-level data to an HMIS.

- **Non-Contributing Program** – A program that does not contribute PPI or other program participant-level to an HMIS.

- **Homeless Assistance Program –** Program, identified by CoC as part of its homeless assistance system, whose primary purpose is to meet specific needs of people who are homeless.

- **Unduplicated Accounting of Homelessness** – Measure of extent and nature of homelessness, utilization of homeless programs over time, and effectiveness of homelessness programs.

- **HMIS Administrator**– Organization designated by a CoC to provide technical assistance, compose and submit regional HUD reports, and lead efforts by the Network to gather and analyze regional homeless data and to create a regional data warehouse.

- **HMIS Lead** – Organization designated by a CoC to operate the CoC's HMIS by selecting the HMIS Administrator and receiving and distributing the HUD HMIS funds.

- **End User** – An employee, volunteer, or other person affiliated with a CHO who uses or enters data in the HMIS or other administrative database from which data are periodically uploaded to the HMIS.

- **HMIS Vendor** – A contractor who provides HMIS software and/or support services for the operation of a CoC's HMIS.

- **HMIS Participation:**
    - Programs must attempt to record all the universal data elements on all program participants served <u>and</u> disclose to HMIS Lead at least once annually
    - All homeless assistance programs should participate
    - Victim Service Providers (as defined by VAWA) are excluded from disclosing PPI to HMIS and will use a comparable database to collect and report on aggregate-level outcomes

- **Protected Personal Information [PPI]** - refers to information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Approved by:

MA-511 Collaborative Applicant and HMIS Lead: Sean Glennon, City of Quincy Department of Planning & Community Development

Signature: _____

Date:_____

CoC Executive Committee Co-Chair: Dennis Carman, United Way of Greater Plymouth County

Signature:_____

Date:_____

CoC Executive Committee Co-Chair: John Yazwinski, Father Bill's & MainSpring, Inc.

Signature:_____

Date:_____