

Somerville/Arlington CoC

HMIS Policies and Procedures

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Overview

The **purpose** of the Somerville-Arlington Continuum of Care Homeless Management Information System (Somerville-Arlington HMIS) is to provide a robust and comprehensive system for collection and dissemination of information about persons experiencing homelessness and the homelessness service system in the City of Somerville and the Town of Arlington. HMIS enhances Participating Agencies' collaboration, services delivery and data collection capabilities. Accurate information is necessary for the Somerville-Arlington Continuum of Care to plan for future needs and meet the reporting requirements of the U.S. Department of Housing Urban Development (HUD).

The **mission** of the Somerville-Arlington Continuum of Care HMIS is to be an integrated network of homeless and other service providers that use a centralized data management system to collect, track and report uniform information on client needs and services. This system meets Federal requirements and also enhances service planning and delivery.

The fundamental **goal** of HMIS is to be able to use data to produce accurate reports to HUD and to provide more effective services. In order to accomplish this, data on the demographics of people experiencing homelessness in Somerville and Arlington must be entered according to the HUD HMIS and Data Standards. HMIS allows the region to identify patterns in the utilization of assistance, and document the effectiveness of services for clients. This will be accomplished through analysis of data that are gathered from individuals and families experiencing homelessness, and from the service providers who assist them in shelter and homeless assistance program throughout the region.

Data that is gathered via intake interview and program participation will be used to meet the wide range of reporting requirements to HUD and inform both project and system level performance. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to various stakeholders in the Continuum of Care.

The Somerville Homeless Coalition (SHC) is the lead agency for HMIS. In this role, the SHC will work directly with participating agencies and their data, as described in the roles and responsibilities section of this document. These policies and procedures applies to all projects that are funded by the Continuum of Care and through the City of Somerville's Emergency Solution Grant (ESG).

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.

This section may be periodically updated to reflect emerging HUD guidance and regulations.

Confidentiality

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

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

Data Integrity

Client data is 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 and Current Data

The availability of a centralized data repository is necessary to achieve the ultimate CoC-wide aggregation of unduplicated homeless statistic. HMIS and the reporting platform are all available 24/7 with the exception of periodic maintenance. Projects are expected to submit and review their data based on the procedures described in this document. Regular review of data ensures that the Continuum is working with current knowledge of homelessness in the region.

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 and additional disciplinary action.

Roles and Responsibilities

The following roles and responsibilities across the CoC will ensure accountability in the quality and completeness of client and project data:

CoC HMIS Lead Agency: Somerville Homeless Coalition (SHC)

Although providers may have direct contracts with HUD, as the HMIS lead agency for the Somerville-Arlington CoC, the SHC is responsible for the overall quality of the data and submissions to HUD. The SHC is the lead agency for HMIS administration and maintains general oversight, guidance, direction and support of HMIS. The SHC assists partner agencies with agency-specific workflow, data collection and reporting needs.

The SHC maintains an agreement with the Somerville-Arlington Continuum of Care that outlines the commitment and responsibility of the agency in this role.

The SHC provides the following functions:

- Maintains this HMIS policies and procedures manual and assures that policies are reflected in agency's practice
- Maintains the contract with Simtech Solutions, Inc. which provides tools and services for data integration and reporting (see below).
- Monitors data for quality and completeness.
- Produces regional HUD reports drawing from all data sources in the region. This functionality is supported by a separate contract with Simtech Solutions, Inc.
- Provides limited assistance to participating agencies with agency-specific data collection and reporting needs.

In addition, the SHC has direct access to project data for the purposes of planning and reporting. The SHC may review this data at any time.

CoC Planning / CoC HMIS Committee

The CoC itself is the liaison with HUD and is responsible for all policies and procedures, project forms and documentation and overall responsibility for the projects. The CoC can include an HMIS committee to provide oversight to the HMIS activities of the CoC and the Somerville Arlington CoC will do so as needed.

HMIS Vendors and Data Integration for Reporting and Analytics

The Somerville-Arlington CoC uses data from several HMIS systems and partners with Simtech Solutions, Inc. to provide data warehousing and a platform for integrating data across systems for reporting and analytics.

The CoC has an agreement with the MA Department of Housing and Community Development (MA DHCD) to use the HMIS system that is licensed by the State - MAHMIS, an implementation of Efforts to Outcomes (ETO) software produced by Social Solutions, Inc. The agreement outlines the responsibilities of both parties regarding use of HMIS.

The Somerville- Arlington CoC partners with Simtech Solutions to integrate data across HMIS systems in order to produce regional reports for HUD. Simtech Solutions also provides ongoing support on all matters related to HMIS and compliance with HUD.

Participating Partner Agency

Agencies that manage homeless-dedicated projects that are either funded by the CoC, or are within its geographic boundaries are expected to contribute data and participate in the CoC. Projects. Agencies that receive funds from the Emergency Solutions Grant (ESG) are also required to participate in HMIS and adhere to these policies. Agencies may use any HMIS system of their choice that is fully compliant with the HUD CSV 5.1 data standards.

Organizations that use the MA HMIS system are expected to complete an Agency Agreement with the State of Massachusetts as a Contributory HMIS Organization (CHO), or Participating Agency. Agencies that use an HMIS that is not hosted by DHCD such as Heading Home and Volunteers of America are responsible for all aspects of this software including maintaining all required agreements and producing all required reports.

All Participating Agencies must abide by all policies and procedures outlined in this manual, which are subject to change. Participating Agencies are responsible for the conduct of their End Users and the security of End User Accounts.

Participating Agency Executive Director. The Executive Director of each Participating Agency is ultimately responsible for ensuring that all the policies and procedures related to data collection and reporting and adhered to by the organization.

The Executive Director is responsible for the following:

- Designation of HMIS Administrator, including when there is staff turnover
- Agency compliance with these Policies & Procedures including data quality and outcome management.
- Compliance with Privacy and Security requirements detailed in the HUD HMIS Data and Technical Standards.
- Annual review of internal policies and procedures regarding HMIS.
- Payment of the agency's pro-rata cost of the Simtech contract

Partner Agency HMIS Administrator. The Partner Agency HMIS Administrator serves as the primary contact between the Partner Agency and the HMIS Lead Agency (Somerville Homeless Coalition).

Partner Agency HMIS Administrators are responsible for the following:

- Program compliance with these Policies & Procedures
- Authorizing agent for Partner Agency User Agreements
- Keeper of Executed Client 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 Policies & Procedures
- First level end user support
- Maintain agency/program data in HMIS
- Authorizing agent for Data Quality Monitoring

Agency Staff

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

Participation in HMIS

Agencies must either provide Somerville Homeless Coalition access to their HMIS system directly or upload data to HomelessData.com on at least a monthly basis. Data should be submitted/ uploaded in the .csv format specified by HUD (see [HUD HMIS Comma-Separated Value Format Documentation](#)). These Partner Agencies must assign a staff member to be the Partner Agency HMIS Administrator (see above).

Domestic Violence Exception

If the sub-recipient is a victim services provider, it is prohibited from entering client-level data into a HMIS and must use a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Legal services providers, who can document that entering client-level data would violate client-attorney privilege, may be permitted to use a comparable database. It is up to the CoC to work with the HMIS lead to determine if a system is a comparable database.

Data Collection and Entry

Standard Data Collection

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

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

Although each participant will use the HMIS in various capacities, the minimum data fields required for all providers regardless of funding source are detailed in Table A below. HUD has mandated these universal data elements for all clients entered into a HMIS. For providers receiving HUD McKinney funding (SHP, SPC, ESG) there are additional program specific data elements which are detailed in Table B.

Please refer to the [2017 HMIS DATA Standards Data Dictionary, released June 2017](#) for more information on HUD data compliance.

Universal Data Elements

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.

TABLE A

First Name	Veteran Status (adults)
Last Name	Disabling Condition (adults)
SSN	Residence Prior to Entry (Adults and HoH)
Date of Birth	Relationship to HoH
Race	Destination (all leavers)
Ethnicity	Client Location for Project Entry
Gender	Length of time on Street, in ES or SH (HoH and Adults)

Program Specific Data Elements for McKinney, PATH and RHY Funded Projects

The following Program-Specific Data Elements will be collected for programs that are required to report to HUD and other organizations. Agencies that do not have this reporting requirement may also collect these elements to facilitate a better understanding of the homeless population in the Somerville- Arlington region. RHY and PATH providers have additional data obligations but these are the common data elements for all programs:

TABLE B

Income and Sources	Mental Health
Non-Cash Benefits	Substance Abuse
Health Insurance	Domestic Violence
Physical Disability	Contact
Developmental Disability	Date of Engagement
Chronic Health Condition	Bed - Night Date
HIV/AIDS	Housing Assessment Disposition

Project Descriptor Elements

Participating agencies are responsible for maintaining the Project Descriptor Elements in HMIS including:

TABLE C

Organization Identifiers	Federal Partner Funding Sources
Project Identifiers	Bed and Unit Inventory Information
Continuum of Care Code	Addition Information: Target Population
Project Type	Additional Information: Housing Type
Method for Tracking ES Utilization	

Data Integrity and Accurateness

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

Informed Client Consent

Participating Partner Agencies will collect and retain signed client consent forms before any client data will be entered into HMIS. Participating Agency staff will thoroughly explain the client consent to each client and will use an approved form. If client consent is not obtained, the agency will enter the de-identified data into an anonymous client record that is minimally necessary for the purposes of tracking of units of service. Clients cannot be denied services if consent to data collection is not given.

Appropriate Data Collection

HMIS End Users will only collect, enter or access clients in the HMIS that exist as clients under the User's area of service. End Users will only collect data relevant to the delivery of services to people experiencing a housing crisis in the Somerville-Arlington region.

Data Timeliness:

Programs are expected to collect and enter client information into HMIS according to the following stages:

Project enrollment: When an individual, and any member of a household, enters a program, a complete HMIS intake (enrollment form) is completed. Ideally HMIS is updated within two business days following client contact but at a minimum:

- Emergency Shelter (ES): within 3 days of service start date/
bed registers updated daily.
- Transitional Housing (TH): within 6 days of program entry
- Permanent Housing (PH): within 6 days of program entry
- Supportive Services Only (SSO): within 10 days of pgm entry or client contact

Updates: These data elements represent information that is either collected at multiple points during project enrollment in order to track changes over time (e.g., Income and Sources) or is entered to record project activities as they occur (e.g., Services Provided). These elements are transactional and historical records must be maintained, along with the dates associated with their collection. The Information Date must reflect the date on which the information is collected and/or the date for which the information is relevant for reporting purposes. Information must be accurate as of the Information Date, regardless of when it is actually collected or entered into HMIS.

Annual Assessments: The annual assessment must be recorded no more than 30 days before or after the anniversary of the client's Project Entry Date, regardless of the date of the most recent 'update' or 'annual assessment', if any [annually]. Information must be accurate as of the Information Date.

Project Exit: As clients leave projects, exit information must be collected and recorded one time. Regardless of the exact date that it is collected or entered into HMIS, the data must accurately reflect the client's response or circumstance as of the date of project exit; the information date must correspond to the project exit date. Edits made to correct errors or improve data quality will not change the data collection stage or the information date. Elements collected at project exit must have an Information Date that matches the client's Project Exit Date and a Data Collection Stage of 'project exit.' Information must be accurate as of the Project Exit Date.

Accuracy and Completeness

Complete and accurate HMIS records are critical for reporting and also to inform policy by providing an accurate picture of people experiencing homelessness in the region and the projects' ability to meet the needs in the region. The Partner Agency Administrator is responsible for maintaining data. The HMIS Administrator is expected to run data quality reports in HomelessData.com.

Client choice in signing the consent form takes precedent and staff should not pressure clients into agreeing to have their information identifiable if the client does not want it so. However, high percentages of anonymous clients may indicate staff or agency understanding of the consent from process may need review and/or clarification.

Proposed Standard:

All clients receiving homeless prevention and outreach services have a record in HMIS Goal and there is less than a 5% Error Rate for the Personable Identifiable Information with the following exceptions:

- *Providers who are bound to exclude personal information from HMIS (i.e. legal service providers)*
- *People that are served through Street Outreach (up to 10% of clients may be entered anonymously)*

HUD calculates and Error Rate based on Don't Know/ Refused and Missing for Personally Identifiable Information including name, SSN, DOB, Race, Ethnicity, and Gender.

Training and Support

Agencies are responsible for training on HMIS data entry and collection tools. The HMIS lead is available to train on the MAHMIS, as the primary CoC HMIS system. Simtech Solutions will provide training and materials to support reporting and outcome management using HomelessData.com as a data platform.

Data Quality (DQ) Monitoring and Reporting

The HMIS lead agency (SHC) will run monthly DQ reports to check for the following:

- All required fields are completed and accurate
- The standards for timeliness, completeness and accuracy are met
- That data quality issues are identified and resolved,

Annual Performance Report (APR) and ESG Consolidated Annual Performance and Evaluation (CAPER) Report

Each project is responsible for data in the Annual Performance Report (APR) for CoC-funded projects, and the Consolidated Annual Performance and Evaluation CAPER report for ESG-funded projects according to the following schedule:

- Immediately after the reporting period ends, the Partner Agency HMIS Administrator project should export data and run the HUD Data Quality Report in HomelessData.com to identify issues with the data.
- Issues should be addressed within HMIS and a fresh report should be run. This should continue until the data meets the standards outlined in this document
- Within 60 days of the end of the reporting period, the Partner Agency HMIS Administrator submits a pdf of an APR generated from HomelessData.com to the HMIS Lead Agency (SHC) and the CoC Lead for review
- Effective April 1st, 2017, Sage Homeless Management Information System (HMIS) Repository, will now be the portal for all CoC Program recipients to submit their APR to HUD. The final APR is to be submitted in HUD's SAGE repository within 90 days of the end of the reporting period.

System Reporting to HUD

In addition to the reporting period for each Annual Performance Report, the CoC is responsible for reporting to HUD across the entire region based on this general annual cycle:

- April: Point in Time and Housing Inventory Chart (from January)
- May / June: System Performance Measures
- September: Annual Housing Assessment Report

Measuring Performance & Utilization

HMIS provides an opportunity to measure performance and understand how each project contributes to the overall goals of the CoC to reduce and end homelessness in the region.

- Length of homelessness (ES, SH, and TH programs)
- Leaving destination (to permanent destinations)
- Maintain and increase income
- Returns to homelessness

Projects can run Annual Performance Reports monthly to understand how a project is performing in these key areas that contribute to the overall goals of the CoC

The CoC will run monthly System Performance Measure Reports to measure progress towards benchmarks and goals as defined by the CoC.

Operating Procedures

Data Retrieval

Partner Agencies

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

HMIS Lead Agency

The HMIS Lead Agency will have access to retrieve limited data in HMIS. HMIS Lead Agency will not access individual client data for purposes other than maintenance, troubleshooting, providing reports, and checking for data integrity.

HMIS Vendors

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

Client

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

Continuum of Care

The Somerville-Arlington CoC's data Sub-Contractor (SimTech) will provide de-identified and aggregate reports at the regional level to the Continuum of Care as-needed in support of its mission to prevent, reduce, and eliminate homelessness.

Public

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

Ethical Data Use

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

Access to Core Database

No one will have direct access to HMIS. Access is provided solely through the vendors.

Security and HMIS Access

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 HMIS and will be issued a user license (login ID and password).

End User Accounts

Each authorized user will be provided with an End User Account and will be expected to adhere to agreements with the HMIS vendors according to contracts. 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 Participating Agency demand that an End User hand over his or her username and password. Participating Agency's shall inform the State of Massachusetts of any changes in personnel or other requests to revoke or transfer accounts.