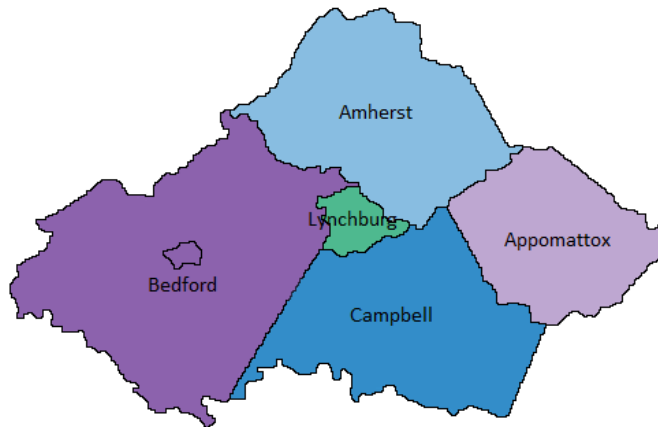## HMIS Policies and Procedures

The Central Virginia Continuum of Care (CVCoC) is responsible for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of Lynchburg City and the Counties of Amherst, Appomattox, Bedford and Campbell.

Approved by the CVCoC Board on 10/07/2020

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Definitions

By-Name List – A list of all known households within our community experiencing homelessness. The list is reviewed twice a month in Community Case Review to connect households with the most appropriate intervention.

Client – Any person receiving services through the Continuum of Care who is, has been, or will be entered into HMIS.

Continuum of Care (CoC) - The Continuum of Care is a member organization designed to promote communitywide commitment to the goal of ending homelessness; providing funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless households; promote access to and effect utilization of mainstream programs by homeless households; and optimize self-sufficiency amount households experiencing homelessness.

HMIS – Homeless Management Information System. An HMIS is a computerized data collection tool used by communities to collect ongoing data on persons who are homeless or receive assistance from the community.

HMIS Administrator – The person(s) in charge of training and reporting on the HMIS to the Continuum of Care and participating agencies.

HMIS Lead – The organization that oversees and implements the HMIS.

HMIS User – A person from a participating agency that has been fully trained by the HMIS Administrator. This person is charged with the responsibility to ensure that all data is accounted for and accurate. The quality of this person's data entry is monitored by the HMIS Lead.

Participating Agency – Any agency within the CoC that has an agency agreement and a license to use HMIS.

ServicePoint –A web-based HMIS that is licensed from WellSky, a Mediware Company, and that is currently used by the Central Virginia Continuum of Care.

About HMIS

The Central Virginia CoC has merged its HMIS database with the Southeastern Virginia Homeless Coalition (SVHC), the Greater Virginia Peninsula Homelessness Consortium (GVPHC), the city of Virginia Beach CoC, the city of Portsmouth CoC which has created the Hampton Roads HMIS. An HMIS is a repository for client level data. HMIS data can be reported for individual agencies; across an entire CoC; or for specific project types, such as emergency shelter, street outreach, rapid re-housing, or permanent supportive housing programs within a CoC. HMIS data helps identify gaps in services and offer a better understanding of the needs of the service population. Participation is required for federally and state funded homeless service providers; other providers voluntarily participate. Domestic violence providers do not enter client level data into the Hampton Roads HMIS due to confidentiality requirements but rather enter data into a comparable database with aggregate data provided to the CoC.

Data Management for the Coordinated Entry System

The Central Virginia Continuum of Care's Coordinated Entry System (CES) utilizes the Hampton Roads HMIS to track and manage all CES data. The CVCoC HMIS Policies and Procedures ensure adequate privacy protections of all participant information per the HMIS Data and Technical Standards at 24 CFR 578.7(a)(8). All users of HMIS participate in mandatory training on the privacy rules associated with collection, management, and reporting of client data. The same privacy protections and rules associated with the use of HMIS are applied in the handling and management of confidential personal information on the By-Name List.

HMIS Structure

The following components comprise the structure of the HMIS:

Continuum of Care (CoC) –The CoC's official name for federal and state purposes is the Lynchburg Continuum of Care (VA-508). Locally VA-508 is known as the Central Virginia Continuum of Care to better represent the geographic coverage area.

HMIS Database – The vendor supplying the HMIS database is WellSky, a Mediware Company, located in Overland Park, Kansas. The organization that serves as the HMIS Lead for the CoC is Miriam's House who contracts with The Planning Council, located in Norfolk, Virginia, to provide technical support.

Participating Agency – Any agency within the CoC may participate in HMIS. Participating agencies are required to have an Agency Agreement signed by their Executive Director. In addition to the Agency Agreement, all participating agencies are required to have a representative at the Data and Performance Committee meeting each quarter.

Agency Users – HMIS users are required to sign a User Agreement form at the time of their formal training and attend quarterly HMIS trainings.

Data & Performance Committee Meeting – The Data and Performance Committee will meet on a regular schedule decided by the committee members, normally quarterly. Committee members will be notified prior to the meeting of any schedule change.

Data Collection

UNIVERSAL DATA ELEMENTS:

All projects entering data into the HMIS are required to collect all universal data elements, regardless of their funding source. The Universal Data Elements are the basis for producing unduplicated estimates of the number of people experiencing homelessness, accessing services from homeless assistance projects, basic demographic characteristics of people experiencing homelessness, and patterns of service use, including information on shelter stay and homelessness over time.

The Universal Data Elements are the foundation on which the Longitudinal System Analysis (LSA) is developed. The LSA informs the AHAR, which provides Congress the national estimates of the current state of homelessness across the

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United States and the use of the homeless assistance programs. Universal Data Elements also help local communities to better target resources and position programs to end homelessness.

Additional information about data collection and entry requirements can be found on the HUD Exchange in the HUD Data Standards manual and Data Dictionary: www.hudexchange.info.

Universal Identifier Elements - One and only one per client record

3.01	Name
3.02	Social Security Number
3.03	Date of Birth
3.04	Race
3.05	Ethnicity
3.06	Gender
3.07	Veteran Status

Universal Project Stay Elements – One or more value(s) per client or household project stay

3.08	Disabling Condition
3.10	Project Start Date
3.11	Project Exit Date
3.12	Destination
3.15	Relationship to Head of Household
3.16	Client Location
3.20	Housing Move-In Date
3.917	Prior Living Situation

Universal data elements are required to be collected by all projects participating in an HMIS, regardless of funding source. Data elements 3.01 through 3.07 are required to be collected once per client, regardless of how many project stays that client has in the system. If, upon Project Start in a new project, the data in these elements are observed to be incorrect or outdated, the data must be corrected in the client record. The remaining universal data elements are to be collected at least once per project stay. The timing of when the data are to be collected and about whom is noted in each data element.

PROGRAM SPECIFIC DATA ELEMENTS:

All CVCoC projects participating in HMIS must collect a subset of the data elements contained in this section to obtain consistent information across a range of projects.

Common Program Specific Data Elements

To determine whether households are accessing all income sources for which they are eligible at the time of project start and to allow for analyzing changing in the composition of income between project start and exit. Increase in income is a key performance measure of most Federal Partner programs. Collecting income information through a project stay supports plans to link clients with all income sources and benefits for which they are eligible and helps CoCs improve system design and partnerships by analyzing cross-systems connections to ensure access to additional income sources.

Data Quality Plan

The HMIS Lead is responsible for the development, implementation and oversight of the Central Virginia Continuum of Care Data Quality Plan. See Appendix I: CVCoC HMIS Data Quality Plan.

Implementing HMIS

In order for an agency to participate in the Hampton Roads HMIS, the following steps need to be followed:

Step 1: Agency Agreement - Every agency interested in participating must have their Executive Director read, agree, and sign an **HMIS Agency Agreement**. Before any training may take place, a signed HMIS Agency Agreement must be provided to the HMIS Administrator.

Step 2: HMIS Training - The HMIS Administrator must provide training to all agency users before they are allowed access to the Hampton Roads HMIS. HMIS users are required to sign a **HMIS User Agreement** form at the time of their formal training and commit to attend at least 75% of the quarterly trainings. All HMIS users are required to participate in ongoing training provided by the HMIS Lead and the HMIS Administrator.

Step 3: User License – Upon completion of training, each user will be provided a license with a unique ID and password, which must not be shared with anyone. Sharing is grounds for immediate termination from the Hampton Roads HMIS. As staff members no longer require access to the HMIS, the Agency must notify the HMIS Administrator immediately, so that the HMIS user accounts are immediately inactivated or changed to accommodate their change in status.

Step 4: Technical Assistance and Reports-- Technical assistance and report requests should be requested through the HMIS Administrator. Training needs should be directed to the HMIS Lead.

Hampton Roads HMIS Participating Agency Agreement

The Hampton Roads HMIS is a client information system that provides a standardized assessment of client needs, creates individualized client service plans and records the client's use of housing and services that communities can use to determine the utilization of services of participating agencies, identify gaps in the local service continuum and develop outcome measures.

The Planning Council is the primary coordinating agency and the system administrator of the Hampton Roads HMIS database. Bowman Systems, a Mediware company is the vendor agency providing the ServicePoint software that has been customized to be the Hampton Roads HMIS database. In this agreement, "Participating Agency" is an agency participating in the Hampton Roads HMIS and "Client" is a client of services.

The signature of the Executive Director/Chief Executive Officer of the Participating Agency indicates agreement with the terms set forth for a Hampton Roads HMIS account for the agency. Changes to this agreement will be provided in writing. Continued use of the system indicates acceptance of the updated terms by the Participating Agency.

I.   **Confidentiality**

The Participating Agency shall uphold relevant federal and state confidentiality regulations and laws that protect client records and the agency shall only release client records with written consent by the client, unless otherwise provided for in the regulation.

A.   The Participating Agency shall abide specifically by federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2 regarding disclosure of alcohol and/or drug abuse client records. In general terms, the federal rules prohibit the disclosure of alcohol and/or drug abuse client records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Participating Agency understands the federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse persons. A copy of 42 CFR Part 2 can be found at http://www.access.gpo.gov/nara/cfr/waisidx_02/42cfr2_02.html.

B.   The Participating Agency shall provide to the client a verbal explanation of the Hampton Roads HMIS database and the terms of consent and shall arrange for a qualified interpreter or translator in the event that a client is not literate in English or has difficulty understanding the consent form.

C.   The Participating Agency agrees not to release any confidential information received from the Hampton Roads HMIS database to any organization or client without proper client consent.

D.   The Participating Agency may not use or disclose protected health information, except either: (1) as the Health Information Privacy and Accountability Act permits or requires, or (2) as the client who is the subject of the information (or the client's personal representative) authorizes in writing.

E.   The Participating Agency shall maintain appropriate documentation of client consent to participate in the Hampton Roads HMIS database.

F.   The Participating Agency shall ensure that all staff, volunteers and other persons issued a User ID and password for Hampton Roads HMIS receive basic confidentiality training and sign a user confidentiality agreement.

G.   The Participating Agency understands that the client data will be encrypted at the server level using encryption technology.

H. The Participating Agency understands the file server, which will contain all client information, including encrypted identifying client information, will be located with the Hampton Roads HMIS server at Bowman Systems Inc., a Mediware company in Shreveport, Louisiana.

I. The Participating Agency shall not be denied access to client data entered by the Participating Agency. Participating Agencies are bound by all restrictions placed upon the data by the client of any Participating Agency. The Participating Agency shall diligently record in the Hampton Roads HMIS all restrictions requested. The Participating Agency shall not knowingly enter false or misleading data under any circumstances.

J. The Participating Agency will utilize the Hampton Roads HMIS Client Consent/Information Release form for all clients providing information for the ServicePoint database. The Client Consent/Information Release form, once signed by the client, authorizes information sharing with Hampton Roads HMIS Participating Agencies as to the extent allowed by the client. If the client does not sign the Client Consent/Information Release form, the client data may still be entered into the Hampton Roads HMIS but is not to be shared outside of the agency providing the service.

K. If a client withdraws consent for release of information, the Participating Agency remains responsible to ensure that no new information is available to all other Participating Agencies.

L. The Participating Agency shall keep signed copies of the Client Consent/Information Release forms for the Hampton Roads HMIS for a period of seven years after the last date of client service.

M. The Hampton Roads HMIS does not require or imply that services must be contingent upon a client's participation in the Hampton Roads HMIS database. Services should be provided to clients regardless of Hampton Roads HMIS participation provided the clients would otherwise be eligible for the services.

N. If this Agreement is terminated, The Planning Council and remaining Participating Agencies shall maintain their right to the use of all client data previously entered by the terminating Participating Agency. This use is subject to any restrictions requested by the client.

O. Victim service providers as defined by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA) should NOT enter data directly in the Hampton Roads HMIS and must use a "comparable database."

II. Hampton Roads HMIS Use and Data Entry

A. The Participating Agency shall follow, comply with and enforce the User Policy, Responsibility Statement and Code of Ethics. The User Policy, Responsibility Statement and Code of Ethics may be modified as needed for the purpose of the smooth and efficient operation of the Hampton Roads HMIS.

1. The Participating Agency shall only enter clients in the Hampton Roads HMIS database that exist as clients under the agency's jurisdiction. The Participating Agency shall not misrepresent its client base in the Hampton Roads HMIS database by entering known, inaccurate information.

2. The Participating Agency shall use client information in the Hampton Roads HMIS database, as provided to the agency, to assist the Participating Agency in providing adequate and appropriate services to the client.

B. The Participating Agency shall consistently enter information into the Hampton Roads HMIS database and will strive for real-time, or close to real-time data entry. As a set standard, data should be entered into the system within 7 business days. The Virginia Beach CoC will record program exit data within 3 business days. If there are additional timeliness standards set forth in other CoC-related polices or procedures that exceed this expectation, those requirements take precedence.

C. The Participating Agency shall comply with data quality standards adopted by the local Continuum of Care, and participate in the Data Quality Plan.

D. The Participating Agency will not alter information in the Hampton Roads HMIS database that is entered by another agency with known, inaccurate information (i.e. agency will not purposefully enter inaccurate information to over-ride information entered by another agency). If the Participating Agency discovers inaccurate information entered by another agency, the Participating Agency will contact the HMIS Administrator to correct the inaccurate information.

E. The Participating Agency shall not include profanity or offensive language in the Hampton Roads HMIS database.

F. The Participating Agency shall utilize the Hampton Roads HMIS database for business purposes only.

G. The HMIS Administrator will provide initial training and periodic updates to that training to select agency staff on the use of the Hampton Roads HMIS software.

H. The HMIS Administrator will be available for technical assistance within reason (i.e. troubleshooting and report generation) related to software operating issues.

I. The transmission of material in violation of any federal or state regulations is prohibited. This includes, but is not limited to, copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secret.

J. The Participating Agency shall not use the Hampton Roads HMIS database with intent to defraud federal, state or local government, clients or entities, or to conduct any illegal activity.

K. The Participating Agency shall immediately notify the HMIS Administrator of any status changes for agency HMIS users to ensure the timely activation or deactivation of user accounts.

III. Reports

A. The Participating Agency shall retain access to identifying and statistical data on the clients it serves.

B. The Participating Agency's access to data on clients it does not serve shall be limited to non-identifying and statistical data.

C. The HMIS Administrator may make aggregate data available to other entities for funding or planning purposes pertaining to providing services to homeless persons. However, such aggregate data shall not directly identify clients.

D. The HMIS Administrator will use only unidentified, aggregate Hampton Roads HMIS data for advising homeless policy and planning decisions, in preparing federal, state or local applications for homelessness funding, to demonstrate the need for and effectiveness of programs, and to obtain a system-wide view of program utilization in the state.

IV. Proprietary Rights of Bowman Systems, a Mediware company

A. The Participating Agency shall not give or share assigned passwords and access codes of the Hampton Roads HMIS database with any other agency, business, or client.

B. The Participating Agency shall not cause in any manner, or way, corruption of the Hampton Roads HMIS database in any manner.

V. Terms and Conditions

A. Neither Hampton Roads HMIS nor the Participating Agency shall transfer or assign any rights or obligations without the written consent of the other party.

B. This agreement shall be in force until revoked in writing by either party.

C. This agreement may be terminated by either party with 30 days written notice.

D. Applicable Laws and Courts: This agreement shall be governed in all respects by the laws of the Commonwealth of Virginia, without regard to conflict of law principles, and any litigation with respect thereto shall be brought in the courts. Hampton Roads HMIS shall comply with all applicable federal, state and local laws, rules and regulations.

E. Anti-discrimination: By entering into a written contract with the Participating Agency, The Planning Council certifies to the Participating Agency that The Planning Council will conform to the provisions of the Federal Civil Rights Act of 1964, as amended, as well as the Virginia Fair Employment Contracting Act of 1975, as amended, where applicable, the Virginians With Disabilities Act, the Americans With Disabilities Act and § 2.2-4311 of the Virginia Public Procurement Act (VPPA). If the award is made to a faith-based organization, the organization shall not discriminate against any recipient of goods, services, or disbursements made pursuant to the agreement on the basis of the recipient's religion, religious belief, refusal to participate in a religious practice, or on the basis of race, age, color, gender or national origin and shall be subject to the same rules as other organizations that contract with public bodies to account for the use of the funds provided; however, if the faith-based organization segregates public funds into separate accounts, only the accounts and programs funded with public funds shall be subject to audit by the public body. (Code of Virginia, § 2.2-4343.1E).

F. Immigration Reform and Control Act of 1986: By entering into a written agreement with the Participating Agency, The Planning Council certifies that The Planning Council does not, and shall not during the performance of the contract for goods and services in the Commonwealth, knowingly employ an unauthorized alien as defined in the federal Immigration Reform and Control Act of 1986.

G. Changes to the Agreement: This agreement constitutes the entire understanding of the parties as to the matters contained herein. Changes to this agreement will be provided in writing. Continued use of the system indicates acceptance of the updated terms by the Participating Agency.

H. Drug-free Workplace: During the performance of this contract, The Planning Council agrees to (i) provide a drug-free workplace for The Planning Council employees; (ii) post in conspicuous places, available to employees and applicants for employment, a statement notifying employees that the unlawful manufacture, sale, distribution, dispensation, possession, or use of a controlled substance or marijuana is prohibited in The Planning Council

workplace and specifying the actions that will be taken against employees for violations of such prohibition; (iii) state in all solicitations or advertisements for employees placed by or on behalf of The Planning Council that The Planning Council maintains a drug-free workplace; and (iv) include the provisions of the foregoing clauses in every subcontract or purchase order of over $10,000, so that the provisions will be binding upon each subcontractor or vendor.

I. For the purposes of this section, "drug-free workplace" means a site for the performance of work done in connection with a specific contract awarded to a contractor, the employees of whom are prohibited from engaging in the unlawful manufacture, sale, distribution, dispensation, possession or use of any controlled substance or marijuana during the performance of the agreement.

J. Authorization to Conduct Business in the Commonwealth: A contractor organized as a stock or nonstock corporation, limited liability company, business trust, or limited partnership or registered as a registered limited liability partnership shall be authorized to transact business in the Commonwealth as a domestic or foreign business entity if so required by Title 13.1 or Title 50 of the Code of Virginia or as otherwise required by law. Any business entity described above that enters into a contract with a public body pursuant to the Virginia Public Procurement Act shall not allow its existence to lapse or its certificate of authority or registration to transact business in the Commonwealth, if so required under Title 13.1 or Title 50, to be revoked or cancelled at any time during the term of the contract. A public body may void any contract with a business entity if the business entity fails to remain in compliance with the provisions of this section.

K. Availability of Funds: It is understood and agreed between the parties herein that the Participating Agency shall be bound hereunder only to the extent of the funds available or which may hereafter become available for the purpose of this agreement.

User Policy, Responsibility Statement & Code of Ethics

User Policy

Participating Agencies shall share information for provision of services to homeless persons through a networked infrastructure that establishes electronic communication among the Participating Agencies.

Participating Agencies shall at all times have rights to the data pertaining to their clients that was created or entered by them in the Hampton Roads HMIS. Participating Agencies shall be bound by all restrictions imposed by clients pertaining to the use of personal data that they do not formally release.

It is a client's decision about which information, if any, entered into the Hampton Roads HMIS shall be shared with Participating Agencies. The Hampton Roads HMIS Client Consent/Release of Information shall be signed if the client agrees to share information with Participating Agencies.

Minimum data entry on each consenting Client will be:

- All programs are required to complete the HUD Required Universal Data Elements in the assigned assessment(s).

Updated by 3/2021

- Programs funded by one or more of the HMIS federal partner programs are also required to enter the applicable Program Specific Data Elements contained in their assigned assessment.

To the greatest extent possible, data necessary for the development of aggregate reports of the homeless services, including services needed, services provided, referrals and client goals and outcomes should be entered into the system.

User Responsibility

Your user ID and password give you access to the Hampton Roads HMIS. Initial each item below to indicate your understanding and acceptance of the proper use of your user ID and password. Failure to uphold the confidentiality standards set forth below is grounds for immediate termination from the Hampton Roads HMIS.

_____ My user ID and password are for my use only and must not be shared with anyone.

_____ I must take all reasonable means to keep my password physically secure.

_____ I understand that the only individuals who can view information in the Hampton Roads HMIS are authorized users and the clients to whom the information pertains.

_____ I may only view, obtain, disclose, or use the database information that is necessary to perform my job.

_____ If I am logged into the Hampton Roads HMIS and must leave the work area where the computer is located, *I must log off of the Hampton Roads HMIS* before leaving the work area.

_____ A computer that has the Hampton Roads HMIS "open and running" shall never be left unattended.

_____ Failure to log off the Hampton Roads HMIS appropriately may result in a breach in client confidentiality and system security.

_____ Hard copies of Hampton Roads HMIS information must be kept in a locked file.

_____ When hard copies of Hampton Roads HMIS information are no longer needed, they must be properly destroyed to maintain confidentiality.

_____ If I notice or suspect a security breach, I must immediately notify the Hampton Roads HMIS Administrator.

User Code of Ethics

A. Hampton Roads HMIS users must treat Participating Agencies with respect, fairness and good faith.
B. Each Hampton Roads HMIS user should maintain high standards of professional conduct in his or her capacity as a Hampton Roads HMIS user.
C. The Hampton Roads HMIS user has primary responsibility for his/her client(s).
D. Hampton Roads HMIS users have the responsibility to relate to the clients of other Participating Agencies with full professional consideration.

E. Hampton Roads HMIS users will not purposely change or modify information entered by other Participating Agencies.

F. Hampton Roads HMIS users will not run reports on other Participating Agencies.

I understand and agree to comply with all the statements listed above.

_____ _____

Printed Name of Hampton Roads HMIS User   Agency

_____ _____

Signature of Hampton Roads HMIS User   Date

_____ _____

Signature of Hampton Roads HMIS Administrator   Date

Technological Requirement for Participating Agencies – All participating agencies must adhere to these requirements wherever HMIS will be accessed.

Hampton Roads HMIS Security Policy

Purpose: This document is designed to establish security standards for participating agencies within the Hampton Roads HMIS system. The following requirements and recommendations are based on the Security Standards as defined in the HUD HMIS Data and Technical Standards Revised Draft Notice of July, 2009. A goal of Hampton Roads HMIS is to support and assist agencies in meeting these requirements.

Security Standards: The Hampton Roads HMIS Security Standards are divided into two sections. Security Requirements are minimum standards with which all HMIS participating agencies must comply. Additional Security Recommendations are best practices recommended by the Hampton Roads HMIS Administrator. The security standards include both technology solutions and protocols for staff use of technology.

Security Audit: The Hampton Roads HMIS Administrator will conduct a security audit to document compliance with the security requirements. The Hampton Roads HMIS Administrator will work with agencies to assess and overcome any identified barriers to security compliance.

Security Requirements

Action	Definition
1. **Applicability**	HMIS Security Requirements apply to all networked computers at HMIS participating agencies as well as all non-networked computers that are used by HMIS participating agencies to access HMIS software. The Security Requirements specifically apply to:

a. All computers connected to the agency's network

b. All computers that access the agency's network via Virtual Private Network (VPN)

c. All other computers, such as employee or volunteer owned computers, used to access HMIS over the Internet

2. **Passwords** — Computers must be secured by a user password at computer login. Computer passwords and HMIS software passwords must meet the following minimum criteria:

   a. Passwords must contain at least 1 number and 1 letter.

   b. Written information pertaining to passwords must not be displayed in any publicly accessible location. Password recording must be disabled at each computer. (Do not use the "Remember Password" feature of applications.)

3. **Anti-virus** — All computers must have anti-virus software installed.

   a. Anti-virus software must be updated regularly.

4. **Firewall** — All computers must be protected by a firewall.

5. **System Updates** — All computers must be regularly updated for protection against security threats and must have the latest service packs installed.

6. **Computer Locking** — Computers must be locked when unstaffed to prevent unauthorized access to the HMIS. Computers must be secured via locking screensavers or by logging off.

7. **Anti-spyware** — All computers must have anti-spyware/anti-malware software installed.

   a. Anti-spyware/anti-malware software must be updated regularly.

8. **Digital Certificates** — All computers must be identified by HMIS through the use of a locally installed digital certificate employing standard Public Key Infrastructure technology.

9. **Wireless Access Points (WAP)** — All wireless LAN devices must utilize WPA or WPA2 security protocols and strong passwords of at least 14 random characters or must utilize a corporate-approved Virtual Private Network (VPN) configured to drop all unauthenticated and unencrypted traffic.

10. **Electronic Data Storage** — All HMIS data is classified as confidential and must be handled discreetly.

    a. Electronic copies shall be stored only on an encrypted device where a password is required to access the data.

    b. Electronic copies shall be stored only where the appropriate staff can access the data.

Additional Security Recommendations

Action	Definition
1. **Computer and HMIS Passwords**	Computer passwords should routinely change at a rate of no less than three times a year.

    a. Computer and HMIS passwords within an agency department should be changed immediately upon personnel changes within that department.

    b. HMIS software user passwords should be different from users' passwords for other non-HMIS accounts.

    c. HMIS software passwords should not be disclosed to anyone else. All passwords should be treated as sensitive, confidential information. Follow these precautions:

- Do not reveal a password over the phone to anyone
- Do not reveal a password in an email message
- Do not reveal a password to the boss
- Do not talk about a password in front of others
- Do not hint at the format of a password (e.g., "my family name")
- Do not reveal a password on questionnaires or security forms
- Do not share a password with family members
- Do not reveal a password to co-workers while on vacation
- If someone demands a password, refer them to this document or have them contact the Hampton Roads HMIS Administrator.

Action	Definition
2. **Avoid Unsafe Behavior**	Computers used to access HMIS should never be used for downloading files offered through various file sharing services such as music sharing services, as such behavior increases the risk of contracting viruses or spyware/malware.

Client Privacy Statement Policy

Privacy Statement Requirements - A requirement for homeless service organizations participation in a Homeless Management Information System (HMIS) is the collection of Protected Personal Information (PPI) from Clients. Homeless service organizations must collect PPI by "lawful and fair means and, where appropriate, with the knowledge or consent of the individual."

To meet this requirement, homeless service organizations must post a **Client Privacy Statement** at each intake desk that explains the reasons for collecting this information. A copy of the Client Privacy Statement must be posted on each participating agency's public website, if applicable. The posted statement refers to the **Notice of Privacy Practices** which should be given to all Clients. If your agency already has a privacy notice, please submit it to The Planning Council so that we may review it for compliance.

Client Privacy Statement

We collect personal information directly from you for the reasons that are discussed in our **Notice of Privacy Practices**. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.

The collection and use of all personal information is guided by strict standards of confidentiality. A copy of our **Notice of Privacy Practices** is available to all Clients upon request.

Notice of Privacy Practices

Purpose of This Notice

The Hampton Roads HMIS is a ServicePoint software product that is a centralized case management system that allows authorized participating agency personnel to collect Client data, produce statistical reports, and share information with select partner agencies if a signed "release of information" form is signed by the Client.

This notice tells you about how we use and disclose your private personal information. It tells you about your rights and our responsibilities to protect the privacy of your private personal information. It also tells you how to complain to us or the government if you believe that we have violated any of your rights or any of our responsibilities.

We are required by law to maintain the privacy of your private personal information. We must provide you with a copy of this notice and get your written acknowledgement of its receipt. We must follow the terms of this notice that are currently in effect.

We reserve the right to change this Notice at any time. This Notice is not a legal contract. If this notice is changed, a copy of the revised notice will be available upon request or posted at our location or on our website

Our Legal Duty

We are required by applicable federal and state law to maintain the privacy of your private personal information. We are also required to make this notice about our privacy practices, our legal duties, and your rights concerning your private personal information available upon request. We must follow the privacy practices that are described in this notice while it is in effect. This notice takes effect immediately, and will remain in effect until we replace it.

We reserve the right to change our privacy practices and the terms of this notice at any time, provided such changes are permitted by applicable law. We reserve the right to make the changes in our privacy practices and the new terms of our notice effective for all private personal information that we maintain, including private personal information we created or received before we made the changes. Before we make a significant change in our privacy practices, we will change this notice and make the new notice available upon request.

Updated by 3/2021

You may request a copy of our notice at any time. For more information about our privacy practices, or for additional copies of this notice, please contact us using the information listed at the end of this notice.

How We Use or Disclose Your Private Personal Information

To Provide Services

We will use private personal information about you to provide you with services. We may share this information with members of our staff or with others involved in your support.

For Administrative Operations

We may use or disclose your private personal information for operational purposes. For example, we may use your private personal information to evaluate our services, including the performance of our staff in caring for you. We may also use this information to learn how to continually improve the quality and effectiveness of the services that we provide to you.

Uses or Disclosures That Are Required or Permitted by Law

For Administrative Functions - We may use or disclose your protected personal information to carry out the administrative functions of our office.

Academic Research Purposes - We may use or disclose protected personal information to individuals performing academic research who have a formal relationship with Hampton Roads HMIS.

Required by Law – We may use or disclose medical information about you when we are required to do so by law.

Public Health Activities – We may disclose private personal information about you if the HMIS user or developer, in good faith, believes that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public and is made to a person or persons reasonably able to prevent or lessen the threat, including the target of the threat.

Victims of Abuse, Neglect or Domestic Violence – We may disclose private personal information about you to a government agency if we believe you are the victim of abuse, neglect, or domestic violence.

Legal Activities – We may disclose private personal information about you in response to a court proceeding. We may also disclose private personal information about you in response to a subpoena or other legal process.

Disclosures for Law Enforcement Purposes – We may disclose private personal information about you to law enforcement officials for law enforcement purposes:

- As required by law.
- In response to a court order, subpoena or other legal proceeding.
- To identify or locate a suspect, fugitive, material witness or missing person.
- When information is requested about an actual or suspected victim of a crime.

Updated by 3/2021

- To report a death as a result of possible criminal conduct.
- To investigate allegations of misconduct that may have occurred on our premises
- To report a crime in emergency circumstances.

Funeral Directors, Coroners and Medical Examiners – We may disclose protected personal information about you as necessary to allow these individuals to carry out their responsibilities.

National Security and Intelligence – We may disclose protected personal information about you to authorized federal officials for national security and intelligence activities.

Protective Services for the President and Others – We may disclose protected personal information about you to authorized federal officials for the provision of protective services to the President of the United States or other foreign heads of state.

Uses or Disclosures That Require Your Authorization

Other uses and disclosures will be made only with your written authorization. You may cancel an authorization at any time by notifying our Complaint Officer in writing of your desire to cancel it. If you cancel an authorization it will not have any effect on information that we have already disclosed. Examples of uses or disclosures that may require your written authorization include the following:

A request to provide your private personal information to an attorney for use in a civil law suit.

Your Rights

The information contained in your record maintained by Hampton Roads HMIS is the physical property of Hampton Roads HMIS**.** The information in it belongs to you. You have the following rights:

Right to Request Restrictions – You have the right to ask us not to use or disclose your private personal information for a particular reason related to our services or our operations. That request must be made in writing to our Complaint Officer. We do not have to agree to your request. If we agree to your request, we must keep the agreement, except in the case of a medical emergency. Either you or Hampton Roads HMIS can stop a restriction at any time.

Right to Inspect and Copy Your Protected Personal Information – You have the right to request to inspect and obtain a copy of your private personal information. You must submit your request in writing to our Complaint Officer. If you request a copy of the information or that we provide you with a summary of the information we may charge a fee for the costs of copying, summarizing and/or mailing it to you.

If we agree to your request we will tell you. We may deny your request under certain limited circumstances. If your request is denied, we will let you know in writing and you may be able to request a review of our denial.

Right to Request Amendments to Your Protected Personal Information – You have the right to request that we correct your private personal information. If you believe that any private personal information in your record is incorrect or that important information is missing, you must submit your request for an amendment in writing to our Complaint Officer.

We do not have to agree to your request. If we deny your request we will tell you why. You have the right to submit a statement disagreeing with our decision.

Right to an Accounting of Disclosures of Private Personal Information -You have the right to find out what disclosures of your private personal information have been made. The list of disclosures is called an accounting. The accounting may be for up to six (6) years prior to the date on which you request the accounting, but cannot include disclosures before July 1, 2004.

We are not required to include disclosures for services, payment or operations or for National Security or Intelligence purposes, or to correctional institutions and law enforcement officials. The right to have an account may be temporarily suspended if it will impede the agency's activities. The notice of suspension should specify the time for which such a suspension is required. Requests for an accounting of disclosures must be submitted in writing to our Complaint Officer. You are entitled to one free accounting in any twelve (12) month period. We may charge you for the cost of providing additional accountings.

Right to Obtain a Copy of the Notice – You have the right to request and get a paper copy of this notice and any revisions we make to the notice at any time.

Complaints

You have the right to complain to us and to the United States Secretary of Housing and Urban Development if you believe we have violated your privacy rights. There is no risk in filing a complaint.

If you are concerned that we may have violated your privacy rights, you disagree with a decision we made about access to your private personal information or in response to a request you made to amend or restrict the use or disclosure of your private personal information, or have us communicate with you by alternative means or at alternative locations, you may complain to us using the contact information listed in this notice.

To file a complaint with us, contact by phone or by mail:

Complaint Officer: Julie Dixon, Senior Director of Planning and Program Development
                              The Planning Council
                              5365 Robin Hood Road, Suite 700
                              Norfolk, VA 23513
                              Phone (757) 622-9268

Questions and Information
If you have any questions or want more information about this Notice of Privacy Practices, please contact:

                    Sarah Fuentes   PO Box 3196
                    Homeless System Coordinator   Lynchburg, VA 24503
                    Miriam's House   434.847.1101

A written request for information is defined under the **Your Rights** section of this notice. Complaints or questions may be made by phone or in writing. We support your right to protect the privacy of information. We will not retaliate in any way if you choose to file a complaint with us.

HMIS Standards of Care

The following standards apply to all HMIS users of the Hampton Roads HMIS and will be subject to a compliance audit by the HMIS Administrator.

Data Collection and HMIS

Standard F1: **The agency does not share HMIS data with any unauthorized entity**.

Guideline F1: The agency has a policy that precludes unauthorized data sharing. The policy and Release of Information is available for review.

Standard F2: **The agency upholds all relevant federal and state confidentiality regulations and laws that protect client records and the agency shall only release client records with written/verbal consent by the client, unless otherwise provided for in the regulation.**

Guideline F2: Release of Information / Confidential Information is signed by the client or there is documentation of verbal consent within the client's file.

Standard F3: **The agency collects, enters and extracts only HMIS data that are relevant to the delivery of services.**

Guideline F3: The agency has a policy regarding data collection, entry and extraction that specifies appropriate use of data. The policy is available for review.

Standard F4: **The agency accurately enters all the required HMIS data within 7 business days of providing services to the client.**

Guideline F4: The agency has a Quality Assurance plan in place and a monthly verification that data was entered accurately within the required time frame. A file review confirms that this has been completed.

Standard F5: **The agency has completed a "Hampton Roads HMIS User Policy, Responsibility Statement & Code of Ethics" agreement for each authorized system user and has provided a copy to The Planning Council.**

Guideline F5: User agreements are up-to-date and on file at the agency and The Planning Council for each user. Agency user agreements are available for review and match the Hampton Roads HMIS user list.

Standard F6: **The agency limits access to information provided by the HMIS database to its own employees specifically for verifying eligibility for service, entering data for services provided, tracking client services, monitoring data quality, and evaluating programs.**

Guideline F6: The agency has a policy regarding access to the HMIS database that is available for review. The policy prohibits employees from using HMIS data in an unethical or unprofessional manner.

Standard F7: **All staff entering/viewing HMIS data in the Hampton Roads HMIS must be appropriately trained and have an individual user license with a unique user name and password (exceptions must be authorized by the HMIS Lead Agency/System Administrator).**

Guideline F7: The HMIS Administrator(s) can describe training provided to staff and the process for ensuring that each user has a license with a unique name and password (unless an exception applies as authorized by the

HMIS Lead Agency/System Administrator). Relevant documentation or tracking system is available for review.

Standard F8: **As staff members no longer require access to the HMIS, their HMIS user accounts are immediately inactivated or changed to accommodate their change in status. The agency must contact the HMIS Administrator to make these changes within 24 hours.**

Guideline F8: The agency has a written procedure for handling HMIS account activation and deactivation as a user's status changes. The written procedure is available for review.

Standard F9: **Technical assistance requests and training issues should be limited to contact with the HMIS Administrator.**

Guideline F9: The HMIS Administrator can describe how technical assistance requests are handled internally and how technical assistance and training needs are communicated to the Hampton Roads HMIS.

Standard F10: **The "Hampton Roads HMIS Client Release of Information" forms or documentation of verbal consent from clients are kept on file for a period of seven years.**

Guideline F10: The agency has a Quality Assurance Plan in place and monthly process that verifies that consent was obtained. Relevant documentation is available for review.

Standard F11: **Service Items and/or Worksheets added to the HMIS database have entry and exit dates that accurately reflect the paper files or intake packets.**

Guideline F11: The agency has a Quality Assurance Plan in place and a process for verifying that entry and exit dates in the files match the HMIS. The agency can produce actual files that contain information that matches the data entered into the HMIS.

Standard F12: **The agency has a written policy that requires that staff inform clients of the purpose for data collection and explain client rights concerning the collection and use of their private information.**

Guideline F12: Signs informing clients of the "purpose for data collection" and the agency privacy policy are posted and easily viewable in each area where intakes are completed. Intake staff can explain how they inform clients of these rights.

Standard F13: **Agency computers used for accessing the HMIS are located in a secure location where access is restricted to authorized staff and employ screen and software security and access restriction measures.**

Guideline F13: The agency has a written security procedures that includes the use of the following: for each work station -- locking screen savers, virus protection with auto-update, individual or network firewalls, software password recording features disabled; for digital data files and storage disks: encryption and password protections.

HMIS Data Quality Plan

INTRODUCTION

This document describes the Homeless Management Information System (HMIS) data quality plan for the Central Virginia Continuum of Care (CVCoC). This document provides basic information regarding an HMIS, the data quality plan and the monitoring plan that will be used to ensure compliance to the data quality plan and the requirements set forth by the Department of Housing and Urban Development (HUD). It has been developed by the HMIS Lead Agency, Miriam's House, with input from the Data and Performance Committee of the CVCoC and the Board of the CVCoC. This plan is to be updated as necessary to comply with current HMIS data standards and local changes.

I. HMIS Data and Technical Standards

An HMIS is a locally administered, electronic data collection system that stores longitudinal person-level information about the men, women, and children who access homeless and other human services in a community. Each CoC receiving HUD funding is required to implement an HMIS to capture standardized data about all persons accessing the homeless assistance system. Furthermore, elements of HUD's annual CoC funding competition are directly related to a CoC's progress in implementing its HMIS.

In 2004, HUD published HMIS Data and Technical Standards in the Federal Register. The Standards defined the requirements for data collection, privacy safeguards and security controls for all local HMIS. In March 2010, HUD published changes in the HMIS Data Standards Revised Notice incorporating additional data collection requirements for the Homelessness Prevention and Rapid Re-Housing Program (HPRP) funded under the American Recovery and Reinvestment Act (ARRA). In May 2014, HUD, the Department of Health and Human Services (HHS) and the Department of Veteran Affairs (VA) announced the release of the 2014 HMIS Data Dictionary and 2014 HMIS Data Manual. This joint release was a product of collaboration between the three agencies to update the HMIS Data Standards to allow for standardized data collection on homeless individuals and families across the system. Since that time, more updates have been provided by HUD and this plan has been adjusted to remain in compliance.

In 2020, HUD updated the HMIS Standards Manual. The HMIS Data Manual supports data collection and reporting efforts of HMIS Lead Agencies, CoCs, HMIS Lead Agencies, HMIS System Administrators, and HMIS Users to help them understand the data elements that are required in an HMIS to meet participation and reporting requirements established by HUD and the federal partners.

II. Data Quality Defined

Data quality is a term that refers to the reliability and validity of client-level data collected in the HMIS. It is measured by the extent to which the client data in the system reflects actual information in the real world. With good data quality, the CoC can 'tell the story' of the population experiencing homelessness. The quality of the data is determined by

assessing certain characteristics such as timeliness, completeness and accuracy. In order to assess data quality, a community must first think about what data quality means and document this understanding in a data quality plan.

III. A Data Quality Plan Defined

A data quality plan is a community-level document that facilitates the ability of the CoC to achieve statistically valid and reliable data. A data quality plan is generally developed by the HMIS Lead Agency with input from community stakeholders and is formally adopted by the CoC. In short, a data quality plan sets expectations for both the community and the end users to capture reliable and valid data on persons accessing the homeless assistance system. A plan that sets data quality expectations will help case managers better understand the importance of working with their clients to gather timely, complete and accurate data.

IV. A Data Quality Monitoring Plan Defined

A data quality monitoring plan is a set of procedures that outlines a regular, on-going process for analyzing and reporting on the reliability and validity of the data entered into the HMIS at both the program and aggregate system levels. A data quality monitoring plan is the primary tool for tracking and generating information necessary to identify areas for data quality improvement.

DATA QUALITY PLAN

I. Data Technical Standards

To ensure that all users protect the data in the system correctly, it is required that all HMIS users use a computer that is password protected with the password not visible anywhere around the computer. Anti-virus is required to be installed on the computer accessing the HMIS and it must be updated regularly. Firewall protection is required to be installed on the HMIS user's computer. The computer system must be up to date. The internet used to access the HMIS must be password protected. HMIS passwords shall not be shared and shall not be written in a visible or common location.

II. Data Timeliness

Entering data into an HMIS in a timely manner can reduce human error that occurs when too much time has elapsed between the data collection and the data entry. The individual doing the data entry may be relying on handwritten notes or their own recall of a case management session, a service transaction or a program exit. Therefore, the sooner the data is entered, the better chance the data will be correct. Timely data ensures that the data is accessible when it is needed especially as the CoC participates in a coordinated assessment and intake system.

The following benchmarks for data entry are by program type:

- Street Outreach: A *Current Living Situation* (4.12) entered within five business days of outreach contact. Universal Data Elements entered as collected within five business days of outreach engagements.
- Homeless Prevention: All Universal Data Elements and Program Specific Data Elements entered within five business days of program entry/exit.
- Emergency Shelters: All Universal Data Elements and Program Specific Data Elements entered within five business days of program entry/exit.
- Rapid Re-Housing: All Universal Data Elements and Program Specific Data Elements entered within five business days of program entry/exit.
- HOPWA: All Universal Data Elements and Program Specific Data Elements entered within five business days of program entry/exit.

- Permanent Supportive Housing: All Universal Data Elements and Program Specific Data Elements entered within five business days of program entry/exit.

Client information should be updated regularly as information changes and at exit or annual assessment, per requirements relative to each universal and project specific data element.

III. Data Completeness

All data entered into the HMIS should be complete. Partially complete or missing data (e.g., missing digits in a SSN, missing the year of birth) can negatively affect the ability to provide comprehensive care to clients. Missing data could mean the client does not received needed services that could help them become permanently housed and end their episode of homelessness. Complete data facilitates confident reporting and analysis on the nature and extent of homelessness. The CVCoC's goal is to collect 100% of all universal data elements. However, it is recognized that this is not always possible in all cases. Therefore, the CoC has established an acceptable range of null/missing and unknown/don't know/refused responses, depending on the data element and the type of project entering data.

Acceptable range of missing (null) and unknown (don't know/refused) responses:

Data Element	Street Outreach	Emergency Shelter	Prevention, RRH & PSH
Name (3.1)	TBD	5%	5%
SSN (3.2)	TBD	5%	5%
Date of Birth (3.3)	TBD	5%	5%
Race (3.4)	TBD	5%	5%
Ethnicity (3.5)	TBD	5%	5%
Gender (3.6)	TBD	5%	5%
Veteran Status (3.7)	TBD	5%	5%
Project Start Date (3.10)	TBD	5%	5%
Relationship to Head of Household (3.15)	TBD	5%	5%
Client Location (3.16)	TBD	5%	5%
Disabling Condition (3.8)	TBD	5%	5%
Destination (3.12)	TBD	40%	5%
Income and Sources (4.2) at Start	TBD	5%	5%
Income and Sources (4.2) at Annual Assessment	TBD	5%	5%
Income and Sources (4.2) at Exit	TBD	5%	5%
Approximate Date started (3.917.3)	TBD	5%	5%
Number of times (3.917.4)	TBD	5%	5%
Number of months (3.917.5)	TBD	5%	5%

To ensure the most up-to-date and complete data, data errors should be corrected on a monthly basis. Each HMIS user will run a CoC Annual Performance Report (APR) for their project(s). The first two weeks of the month should be used to complete any remaining data entry, run an initial report, and address data quality issues flagged.

IV. Data Accuracy and Consistency

Data should be collected and entered accurately and consistently. Accuracy of data in an HMIS can be difficult to assess because it depends on the client's ability to provide the correct data and the intake worker's ability to document and enter the data accurately. Data entered into the HMIS should regularly be compared to paper records to ensure consistency. The purpose of accuracy is to ensure that the data in the HMIS is the best possible representation of reality

as it relates to homeless persons. To that end, all data entered into the HMIS should be a reflection of information provided by the client, as documented by the intake worker. Recording inaccurate information is strictly prohibited.

In order to ensure consistency, all programs participating in HMIS should use the standardized intake tool developed by the CVCoC. The intake tools parallel with the HMIS data elements and allows all intake workers to collect and enter data in a consistent manner. Some programs will have additional intake materials but this basic tool should be used by all programs to capture required HMIS data elements.

The data accuracy standard for all programs participating in HMIS is 95%. Thus, the percentage of client files with inaccurate HMIS data entry should not exceed 5%.

V. Data Training

To ensure all of these standards are met, each HMIS user is required to attend 75% of the HMIS trainings offered each year. HMIS trainings are offered through the quarterly Data and Performance committee meetings.

DATA QUALITY MONITORING PLAN

The CVCoC recognizes that the data produced from the HMIS is critical to meet the reporting and compliance requirements of individual programs, agencies and the CoC as a whole. As such, all agencies participating in HMIS are expected to meet the data quality benchmarks described in this document.

Roles and Responsibilities

The CVCoC Board provides overall direction and oversight of the HMIS Lead, Data and Performance Committee and all agencies participating in HMIS.

The HMIS Lead, Miriam's House, is responsible for working with the HMIS Administrator, The Planning Council, to create new users and projects. An HMIS Lead representative provides new user training and ongoing refresher training to HMIS users to promote data quality. An HMIS Lead representative chairs the Data and Performance Committee of the CVCoC and holds quarterly meetings in January, April, July and October. The HMIS Lead will monitor HMIS participating agencies to ensure that the standards of technical, timeliness, completeness, and accuracy and consistency are met through the following means:

1. Technical: The HMIS Lead visits each HMIS user to complete the Technical Standards Checklist (*Appendix III*)
2. Timeliness: APRs are reviewed monthly by the HMIS Lead Agency to assess whether the majority of program records are entered prior to 6 days. If the program requires technical assistance to make improvements, the HMIS Lead will provide or arrange this assistance.
3. Completeness: Each HMIS user runs an APR on a monthly basis to demonstrate their data completeness error rate and sends it to the HMIS Lead. If an error rate is below the standard, the user will be provided with technical assistance and additional training opportunities.
4. Accuracy and Consistency: The HMIS Lead will conduct an annual audit of each program in order to compare client files with data entered into HMIS to ensure that the data accuracy standard is met.

The Data and Performance Committee will meet quarterly and review data quality reports. The committee will provide feedback and support to programs struggling with meeting the data quality benchmarks. The Data and Performance committee will note training needs amongst HMIS users and work alongside the HMIS Lead and HMIS Administrator to provide training for all HMIS users in the CVCoC.

HMIS participating programs are responsible for ensuring that they maintain a high level of data quality by entering and correcting data in accordance with the data quality plan. The program's Executive Director or equivalent should oversee HMIS user(s) to ensure quality data collection and entry practices. Each HMIS participating program should have an identified representative sit on the Data and Performance committee of the CVCoC and all users should participate in available trainings. Each HMIS participating program is required to have an annual site visit from the HMIS Lead to monitor data standards.

Compliance

It is expected that all programs participating in HMIS will maintain a high level of data quality. Each program participating in HMIS will receive an annual report from the HMIS Lead summarizing their monthly data timeliness, monthly data completeness and annual data accuracy reports. This annual report will also summarize the program's response to make corrections in the specified time period and any other findings or concerns that either the HMIS Lead, Data and Performance Committee or Board of the CVCoC may have regarding data quality. The report will provide documentation of user attendance at quarterly trainings as well as adherence to the HMIS Technical Standards. Programs desiring funding through the Continuum of Care are expected to maintain compliance with the data quality plan and data quality monitoring plan.

HMIS Audit Accuracy Checklist

Agency: _____ **Program**: _____

User: _____ **Client ID**: _____

The following list is to ensure that all client information is entered into the system correctly. The questions are formatted in a complete / incomplete manner with a check in the box indicating the client's information matched the intake form, based the demographics entered. Some agencies may not answer all the questions below; those questions will be marked N/A and will not affect the overall score.

Client Profile

- [ ] 1. Name
- [ ] 2. Social Security Number
- [ ] 3. Social Security Number Data Quality
- [ ] 4. US Military Veteran
- [ ] 5. Household Information
- [ ] 6. Release of Information
- [ ] 7. Entry/Exit Information

Entry Assessment

- [ ] 8. Date of Birth
- [ ] 9. Date of Birth Data Quality
- [ ] 10. Primary Race
- [ ] 11. Secondary Race
- [ ] 12. Ethnicity
- [ ] 13. Gender
- [ ] 14. Does the Client have a disabling condition?
- [ ] 15. Relationship to Head of Household
- [ ] 16. Client Location
- [ ] 17. Residence prior to Project Entry
- [ ] 18. Length of Stay in Previous Place

- [ ] 19. Approximate date homelessness started
- [ ] 20. Regardless of where they stayed last night – number of times the Client has been on the streets, in ES or SH in the past 3 years including today
- [ ] 21. Total number of months homeless on the street, in ES or SH in the past 3 Years

Income / Benefits

- [ ] 22. Total monthly income
- [ ] 23. Income from any source
- [ ] 24. Non-Cash benefit from any source
- [ ] 25. Covered by Health Insurance
- [ ] 26. Monthly Income Details
- [ ] 27. Non-Cash Benefits Details

Insurance / Disability / Outreach

- [ ] 28. Health Insurance Details
- [ ] 29. Disability Details
- [ ] 30. Domestic Violence Victim / Survivor
    - [ ] a. If Yes, Timeframe
    - [ ] b. Currently Fleeing
- [ ] 31. Residential Move-in Date (PH only)

Data Quality Score: _____ /_____ **Percentage:**_____%

Audit Comments:

I acknowledge the HMIS Audit data accuracy score written above.

HMIS User:_____**Date**:_____

HMIS Lead:_____**Date**:_____

Central Virginia
CONTINUUM OF CARE

HMIS Technical Standards Checklist

Agency: _____ **Program**: _____

User: _____

The following list is to ensure that all users protect the data in the system correctly. The questions will be a yes/no format.

Technical Standards

- [ ] 1. Computer is password protected
- [ ] 2. Computer's password is not visible
- [ ] 3. Anti-virus is installed
- [ ] 4. Anti-virus is auto-updated/regularly updated
- [ ] 5. Firewall is installed. Software/Hardware
- [ ] 6. System is up to date (Windows 10)
- [ ] 7. Wireless system is password protected
- [ ] 8. HMIS passwords are not visible
- [ ] 9. HMIS passwords are not written in "common" locations

Technical Standards Report: _____ /_____   **Percentage:_____%**

Technical Standards: ☐ Pass   ☐ Fail

> *Audit Comments:*

I acknowledge the HMIS Audit data accuracy score written above.

HMIS User:_____**Date**:_____

HMIS Lead:_____**Date**:_____

Authorization of Release of Confidential Information

Organization: _____   Program: _____

Head of Household: _____   Date of Birth: _____

Other Household Names and Birthdates:

_____

_____

_____

When you request or receive services through a homeless response program within the Central Virginia Continuum of Care, we collect information about you and members of your household to improve service coordination, help meet your needs, and fulfill program requirements.

What information is collected?

Depending on your situation, you may be asked for some or all of the following for you and your household:

- Basic identifying information (name, SSN, date of birth, etc.)
- Demographic information (race, ethnicity, gender, etc.)
- Housing information (homeless status, length of time homeless)
- Income and benefit information (source and amounts, employment information)
- Health related information (disability information, substance abuse history, etc.)
- Housing barriers (criminal convictions, eviction history, etc.)

Why is information collected?

- To better assess your needs and the needs of others experiencing or at risk of homelessness
- To make it easier for households to receive services across multiple CVCoC agencies
- To carry out administrative functions
- To analyze aggregate data on issues and programs related to homelessness

How is information stored?

Collected information is stored both in your physical case file, a by-name-list of all homeless persons and in a Homeless Management Information System (HMIS). The HMIS is a system that uses computers to collect information about homelessness in order to help pay for and coordinate services to people who are homeless.

How is information protected?

All CVCoC participating agencies must abide by state and federal laws to protect your data. CVCoC Policies and Procedures establish additional requirements to ensure that your information is kept confidential. All paper files are kept in locked cabinets and information entered into the CVCoC's database (HMIS) is encrypted to ensure security. Information will only be shared outside of the CVCoC as required by law.

How is information shared?

- If you choose to sign the release of information, your household record will be made available to agencies within the Central Virginia Continuum of Care who also enter household data into the Homeless Management Information System (HMIS). Households residing in domestic violence shelters will not have their information entered into the HMIS.
- Representatives from agencies working with the CVCoC may also receive limited information through participation in the Community Case Review in order to help resolve your housing crisis.
- This agreement may be revoked at any time.
- You may obtain a copy of your information at any time upon written request.
- Your decision to sign or not sign this consent document will not be used to deny outreach, shelter or housing services.
- If you have questions or complaints regarding the privacy or security of your information, you may contact:

Miriam's House, 409 Magnolia Street, Lynchburg, VA 24503 OR email info@miriamshouseprogram.org

Consent

I have read the above information and authorize agencies within the Central Virginia Continuum of Care to share my information as outlined for the purposes outlined. I agree that this consent is in effect for three years.

_____   _____
Signature of Head of Household   Date

_____   _____
Signature of Agency Witness   Date

_____   _____
Printed Name of Agency Witness   Expiration Date (3 years from start)

_____

Consent Revocation

I, _____ (client), wish to revoke the above release of information effective as of _____ (date). This revocation will not affect any disclosures already made prior to the cancellation notice.

_____   _____
Signature of client   Date

_____   _____
Witness   Date