

South Central Illinois Continuum of
Care
Homeless Management Information
System

Policies and Procedures Manual
April 11, 2018

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Introduction

General Information

The U.S. Department of Housing and Urban Development (HUD) has put forth rules regarding the requirement for recipients of HUD related funding and other providers of service for people experiencing homelessness to participate in a Homeless Management Information System (HMIS). This manual outlines policies and related information on the South Central Illinois Continuum of Care (SCICoC) HMIS.

The SCICoC HMIS is a collaborative effort between, Municipal Information Systems Inc. (MISI), Embarras River Basin Agency (ERBA) and the SCICoC.

The Continuum represented by the SCICoC Board and the HMIS Committee have an ongoing role to ensure the success of the HMIS system by giving input into the HMIS policy decisions within the parameters established by HUD.

The software used by the SCICoC is ServicePoint, supplied by MISI via Mediware formerly Bowman Systems. By HUD Regulation, Domestic Violence agencies funded through the CoC are required to gather the same level of data shared in ServicePoint in a comparable system.

This manual contains information and procedures related to the SCICoC HMIS. It is expected that the procedures document is not static and will be modified over time as needed.

Key Terms

Term Definitions

- a. Aggregate Data – Any data not required by HUD, but possibly used in program or needed for evaluations.
- b. HMIS Provider- Municipal Information Systems Inc.
- c. HMIS Coordinator-person appointed to monitor HMIS policy, procedure and usage confirmation to policies and procedures manual.
- d. Contributing HMIS organization (CHO)-agency that inputs data in the HMIS system.
- e. Agency Administrator-person(s) selected by participating agency to monitor agency confirmation of the policies and procedures manual.

Contact Information

For information regarding the SCICoC policies and procedures please contact the HMIS Coordinator or Agency Administrator listed in contact sheet (Exhibit 1).

Management and Administration

System Availability

The SCICoC HMIS, ServicePoint website is available to participating agencies 24 hours a day, 7 days a week. In case there is a planned outage or issues impacting availability users will be advised in advance if at all possible.

ServicePoint Licenses

ServicePoint is a web-based database allowing any organization with internet access and authorization to be able to enter and report on their client information. ServicePoint is supplied by MISI. Agency must enter into an agreement with MISI to have authorization to use ServicePoint.

HMIS/Agency and User Agreements

HMIS Coordinator and HMIS Agency Administrators will be able to add, modify, and view agency users. Agency administrators adding new users must ensure that the user has signed the user agreement and that it is submitted to HMIS Coordinator.

Each participating agency that accesses the SCICoC HMIS system must annually complete the following:

- The "Agency Information Form" – providing accurate and up-to-date information on the Agency name, primary contact for HMIS matters, and other descriptive information regarding the agency. This form should be updated whenever personnel or programmatic changes are made.
- The "Agency Participation Agreement"
- One or more "User Policy and Responsibility " documents - one for each user who will need access to the HMIS and /or who will be entering data in the SCICoC HMIS.

HMIS User Activation

As soon as possible following the receipt of the completion of required training and appropriate signed user agreement forms from an agency participating in the SCICoC HMIS, the HMIS Provider or HMIS Coordinator will be activated and notified of their user name and opening password. The password must be changed upon initial use of the SCICoC HMIS.

Updating SCICoC HMIS User Agreements

At any time, there is a significant change at the agency level it is the agency's responsibility to notify the HMIS provider or HMIS Coordinator.

Failure to provide notification of changes could expose confidential client information or negatively impact the SCICoC HMIS.

Client Grievance

Neither the SCICoC nor ServicePoint intends to create or establish any unique grievance management process. All agencies are responsible for setting up an internal grievance process to handle client complaints related to HMIS, including grievances related to consent and release of information. Any grievance shall be reported to the Lead HMIS agency to insure the policies and procedures are being followed by HMIS users.

Restricted User Access

The SCICoC Administrator or Provider reserves the right to deny or restrict user access as a result of the user not following the rules and guidelines in this manual or for any other inappropriate use of the HMIS Data:

- Intentionally entering or altering HMIS records to misrepresent dates, amounts, or types of services a client (s) received.
- Unauthorized access, alteration, destruction, removal and/or disclosure of data and/or information
- Disclosure of confidential passwords or personal identification numbers
- Failure to protect confidential/private client data
- Any other malicious or unethical use which violates federal laws.

Reports

ServicePoint provides a set of standard reports. Agency specific reports are available to participating agencies. Continuum reports are available to the HMIS Coordinator.

Data Export

Agency data may be exported to a spreadsheet for the use in locating information not contained in standard reporting or to verify standard reporting accuracy. Data that has been exported must be protected with regards to privacy or theft of the information.

Other Reporting

Other reports may be requested from the HMIS provider with the understanding that there may be a cost to provide such reports.

SCICoC HMIS Trainings

HMIS trainings are available online at <http://www.pathwaystraining.org/> . Other trainings may be planned by the Data Leadership and Performance Measure Committee or users group.

Data Quality Training

Once a year the lead agency will provide training on the data elements required by HUD.

Violation of agreement

If HMIS Provider, HMIS Coordinator, or Data Leadership and Performance Measure Committee suspect a violation of agreement, the SCICoC Board will appoint a task force to assess the situation and make a recommendation to the board. If there is a finding of a violation of the policies, the Board will notify the agency and/or individual: listed below are some of the possible consequences.

- Written notice to organization
- Loss of person's individual license
- Reflection in agency's score and ranking

Participation Policies

HMIS Assessment and custom reporting

The CoC and/or participating agencies may work with the HMIS provider to create additional custom assessments or reporting. Please note there may be additional fees assigned to this service, based on the complexity of the requested customization.

Participating Agency Hardware and Software Internet requirements

Use of the SCICoC HMIS requires that the user have an internet capable device. PCs, Laptops, Tablets and Smart phones can access ServicePoint, however some functionality of ServicePoint may be limited with some devices. Internet speed (such as DSL or Broadband) will be more satisfactory than “dial up” or phone connections.

Technical Support

MISI staff is available most days between 9am and 4pm to provide telephone or email support. It is preferable that users contact their Agency Administrator if a problem occurs and allow the Agency Administrator to contact support. For other general questions users may contact the HMIS Coordinator.

Participating agencies are responsible for providing their own technical support for all hardware and software systems used to connect to the HMIS system and for maintaining internet access.

Email Communications

HMIS providers and Coordinator will use email to share information, announce training opportunities, and make users aware of any related information. Users need to insure that the HMIS Coordinator has their email address.

SCICoC HMIS User Group

All active users of the SCICoC HMIS will form the HMIS Users Group. The group will have monthly call ins to discuss issues, changes and update users on available trainings.

Client entry/Exit Data Requirements

All organizations, who receive funds through the SCICoC, with the exception of dedicated agencies who serve Domestic Violence Victims, are required to enter into the SCICoC HMIS. Individuals served by TH, PSH, PSH-RR, TH/RR, ESG RR, and ESG Shelter are required to be put into the SCICoC HMIS. Use with other programs is optional but encouraged to insure the continuum has available data to make program determinations. See section 6.0 for required data to be entered.

Service Start/End Date Requirements

All organizations are required to enter at least one basic service. It is also good practice to maintain notes, goals and achievements in the HMIS.

All Clients being housed must be tied to a shelter/housing service with a start and end date.

Emergency Shelter Programs -	Service start date applies to the day The client occupies a bed. Service end date for all clients is the date the client no longer occupies bed.
Transitional Housing Programs	Service start date applies to the day the client has met the program eligibility and is offered a unit. Agencies must also enter the actual move in date that the client enters the actual unit. Service end date for all clients is upon termination of housing services.
Rapid Re-Housing	Service start date applies to the day the client has met the program eligibility and is offered a unit. Agencies must also enter the actual move in date that the client enters the actual unit. Service end date for all clients is the last day a service was provided or the last date of a period of ongoing service.
Permanent Housing Programs-	Service start date applies to the day the client has met the program eligibility and is offered a unit. Agencies must also enter the actual move in date that the client enters the actual unit. Service end date for all clients is only upon death of client or termination of housing assistance

Security

Access to SCICoC HMIS

Access will be allowed only by authorized users. The location of access will be restricted to locations where confidentiality of the information can be maintained. Public Wi-Fi should not be used due to inability to control data security. Home use may be used but user should insure that family members do not have access to client data.

SCICoC HMIS Security

Every effort must be made to assure that protected client data is handled securely, responsibly and in accord with the client's wishes.

The HMIS Coordinator along with Agency Administrator are responsible for validating, establishing and granting security permissions and making sure security procedures are followed as directed by the SCICoC Board or its authorized agent.

HMIS Coordinator and Administrators shall have necessary and appropriate access to data submitted by participating organizations as need to administer the HMIS software, resolve data issues, and assure data security and integrity.

HMIS users are responsible for assuring that client information in the HMIS system is handled responsibly.

Security Procedures

- Each agency is responsible for administering its own users and assuring that they receive required training in the confidential handling of client information.
- ServicePoint providers or HMIS Coordinator are responsible for setting up SCICoC HMIS users, User IDs and passwords.
- It will be the Agencies' responsibility to inform HMIS Coordinator of any staff changes (Resignations, transfers, etc.) involving HMIS Users within 1 business day of the action taken.
- Any paper or other hard copy generated by or for the Agency or SCICoC that contains identifiable information must be under constant supervision by authorized user when in public area.
- When staff is not present, all users must be logged off so that information is not publicly accessible.

- Any printouts must be kept in a locked file and when no longer needed they shall be shredded or otherwise properly destroyed to maintain confidentiality.
- Written information, specifically pertaining to user access (user name and password) shall not be stored or displayed in any publicly accessible location.

User IDs and Passwords

User passwords help to ensure that only authorized individuals access the SCICoC HMIS. The username and password also helps to determine accountability for all transactions and other changes made to the system resources, including data. Sharing a username or password is a violation of this policy.

The authorized user(s) will be held responsible if another individual uses their access privileges to damage the information on the system, or make unauthorized changes to the data or to release client information.

Rules for Safe Computing and User IDs and Passwords

- DO NOT share your ID or Password with anyone
- DO NOT use someone else's ID or Password. If you need more access than you presently have or if you are having problems with your access, contact the Agency Administrator or HMIS Coordinator for assistance.
- DO NOT use obvious, trivial, or predictable passwords.
- BEWARE of "Shoulder Surfers". These are people who stand behind you and look over your shoulder while you are keying in your password or PIN, or while you are working with confidential information.
- DO NOT use your level of access to enable others to access information that they are not authorized to access, or to submit transactions that they are not authorized to submit.
- NEVER write down your passwords and post them on your terminal or other obvious places.
- ALWAYS change the initial password assigned to you by your administrator upon your first log on.
- If a user is going to be away from the office for an extended period, notify the Agency Administrator or HMIS Coordinator to have the user ID temporarily suspended.

ServicePoint HIPPA Compliance

Data entered into the ServicePoint system is stored in a HIPPA compliant data center. Methods used to ensure that the system is fully compliant include:

- Network security includes firewalls, certification servers, VPN access and operating system authentication.
- Client Record Privacy Options allow or restrict access to all or part of a client file, including individual fields.
- Automatic timeout logs a user out of the system after a specified period of idle time, thereby decreasing the potential viewing or manipulation of client data by unauthorized individuals.

Data Availability and Disaster Recovery

ServicePoint has insured that copies of the database are backed up on a regular schedule and that the information is maintained to restore access to the SCICoC should a natural disaster or other issue impacts the availability of the primary database

Privacy/Confidentiality

Protected Personal Information

HUD identifies certain HMIS data as Protected Personal Information (PPI). The Agencies, Continuum of Care, the HMIS Staff, and users must use special care when working with or printing out data involving Protected Personal Information such as:

- Names
- Social Security Numbers
- Date of Birth
- Date of program participation
- Any other unique identifying number or code

The intent is always to keep all client information private at all times, and to share any client information only when a Release of Information (ROI) has been signed by the client. Some situations are recognized in the HUD rules, and in Federal, or State law that make release of the information necessary or even mandatory.

SCICoC requirement to place Protected Personal Information in HMIS

No PPI may be entered into the HMIS without authorization from the client. All adults must sign a South Central Continuum of Care Network Authorization Form. The Head of Household must sign a family ROI for children living in the household. For the purpose of this section an adult is anyone over 18.

Clients must be informed about the intended use of PPI at the time information is collected.

It is allowable when conducting a phone intake that Agency personnel obtain consent via the phone after explanation of the HMIS and receive their permission.

Allowable uses and disclosures of Protected Personal Information

Under the HUD rules, the following is considered to be allowable uses of Protected Personal Information (PPI):

- To provide or coordinate services to an individual
- For functions related to payment or reimbursement for services
- To carry out administrative functions, including but not limited to legal, audit, personnel, oversight, and management function uses and disclosures required by law.

Agency may use or disclose PPI when required by law to the extent that the use of disclosure complies with and is limited of the requirements of the law. A participating agency may, consistent with applicable law and standards of ethical conduct, use or disclose PPI if:

1. The Agency in good faith, believes the use or disclosure is necessary to prevent or lessen a serious and imminent threat to health or safety of an individual or the public; and
2. The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

Release of Client Information

By participating in the Continuum of Care, and the HMIS, all participating agencies agree to the highest standards of confidentiality and to seek authority and permission from clients for release of any identifiable client information.

Understanding the client has the right to have access to their own data.

- A release of information form must be signed by a client before any PPI is released.
- Written interagency data sharing agreements (i.e., Memoranda of Agreement), if any, between particular agencies will have to be in place and on file with the HMIS Lead Agency prior to sharing of information with the HMIS.
- A Privacy Notice shall be prominently displayed in the program office where intake occurs. The content of the privacy notice shall be accordance with HMIS Privacy Standards in the Federal Register.

Right to Revoke

Explanation must be made to the client that they can at any time revoke consent for release of information or the authorization for viewing the information in the HMIS.

Data Quality Plan

Introduction

The following describes the HMIS data Quality Plan for the South Central Illinois CoC. It includes the data quality standards and expectations, as well as data quality components and protocols for ongoing data quality monitoring which meets the requirements set forth by HUD.

Data quality is the term that refers to the completeness, validity, and reliability of client level data entered into the HMIS. While no data system has a 100% quality rating, it is the SCICoC's intent to maintain as high of quality information on homelessness to assist the SCICoC Board in determining the appropriate funding and location for system components to best reach the continuum goal of ending homelessness.

Data Elements

The data standards manual located at <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2017.pdf> and the data standards dictionary located at <https://www.hudexchange.info/resources/documents/HMIS-Data-Dictionary.pdf> are the basis for the required data collection and input into the HMIS System. These two documents are updated periodically and the latest version will be accepted as the criteria used to review the HMIS and the data completeness.

The HMIS Lead Agency will notify the HMIS users through the agency administrators of updates to the dictionary and data standards manual.

Data Collection

With the use of data collection templates, it is the responsibility of each agency to monitor the collection of data to input into the HMIS. The templates will be updated yearly to ensure that any changes in HUD data elements are included.

Upon release of new data quality standards, a training will be held for either all agency administrators or all HMIS users to provide training on the new standards. The HMIS lead will provide the training.

Data Quality Monitoring

To insure that the data is reliable and valid it is important to monitor the HMIS at both a programmatic and aggregate level. This will be the primary tool for tracking and generating information to identify the areas of data quality improvement.

Data quality monitoring is a plan that will outline a regular, and on-going process for analyzing and reporting the reliability and validity of data entered into the HMIS. The data is analyzed at a programmatic and aggregate system level.

Agencies will conduct monthly reviews of the data quality. This can be done by running the ARTs report 231 in the HMIS system and also running program APRs to check for missing or incorrect data. Should updates to the HMIS system change the reporting, the Lead HMIS agency will notify the SCICoC of appropriate reports.

The Lead HMIS agency will conduct quarterly review for all agencies on the completeness and accuracy of the HMIS data. The report will be shared with the agencies and also the SCICoC Executive Board.

The Executive Board shall determine if any action should be taken with agencies that fail to maintain the data quality and accuracy.

Accurate and Timely

To reduce human error HMIS data must be regularly, completely and accurately entered into the HMIS system. The following schedule should be considered as the timeliness of data entry:

- Emergency Shelters: Universal Data Elements and Housing check-in/check-out must be entered within three business days.
- TH, PSH, PSH RR, and TH/RR: Universal data Elements, Program Specific Data Elements, project entry/project exit must be entered within two business days.
- ESG Rapid Rehousing and Homeless Prevention Programs: Universal and Program specific data elements must be entered within two business days.

Changes in client level data should be entered in to the HMIS within 5 business days after collection of the data.

As for program requiring annual updates completed within 30 days before to 30 days after the anniversary date of project entry shall be entered into the HMIS no later than 2 business days after collection of the data.

Completeness

The goal is to collect and enter all of the required data elements into the HMIS. However, in situations where the data is not available, the following table is the acceptable range of missing (null) or unknown (Don't know/refused) responses by program type.

	TH, PSH, PSH RR, ESG RR, Emergency Shelter (program-reserved bed		Emergency Shelter night to night entry no reserved	
Data Element	Missing	Don't Know/Refused	Missing	Don't Know/Refused
First & Last Name	0%	2.5%	0%	2.5%

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Full SSN	0%	2.5%	NA	NA
Date of Birth*	0%	2.5%	0%	2.5%
Race	0%	2.5%	0%	2.5%
Ethnicity	0%	2.5%	0%	2.5%
Gender	0%	2.5%	0%	2.5%
Veteran Status	0%	2.5%	0%	2.5%
Disabling Condition	0%	2.5%	0%	20.0%
Prior Living Situation	0%	0.0%	0%	10.0%
Length of Stay	0%	2.5%	0%	30.0%
Continuously Homeless	0%	2.5%	0%	30.0%
Time Homeless	0%	2.5%	0%	30.0%
Family Type	0%	2.5%	0%	2.5%
Marital Status	0%	2.5%	0%	2.5%
Income & Benefits at entry **	0%	2.5%	0%	2.5%
Income & Benefits at exit **	0%	2.5%	0%	2.5%
Date actual Housed	0%	0.0%	0%	0.0%
Destination	0%	2.5%	N/A	N/A
Reason for Leaving	0%	2.5%	N/A	N/A
Health Insurance Entry	0%	2.5%	N/A	N/A
Health insurance Exit	0%	2.5%	N/A	N/A
Domestic Abuse	0%	2.5%	N/A	N/A

* If client is unaware of their DOB use their age and calculate the year and enter the DOB as 1/1/xxxx (which denotes the year associated with the age.)

** This denotes that each question within the category should be completed.

Data Accuracy

While it is very difficult to ensure that the clients are providing accurate information, it is important that while working with client that information is gathered in a progressive process, that is by gaining the trust of the client over a period of time, rather than just gathering information to

complete the data elements. Data may be corrected if original information is found to be in error. Agencies may do a self-check by asking a client to review their information for accuracy.

Agreement

As part of the agreement in participating in the HMIS, all agencies and users agree to the importance and implementation of the Data Quality Plan.

Appendix

Attached Documents

Exhibit 1-HMIS Contact Sheet

Exhibit 2-Summary of Universal Data Elements and Program Specific Data elements

Exhibit 3-Agency ServicePoint Participation Agreement

Exhibit 4-SCICoC HMIS User Policy Agreement

Exhibit 5- South Central Continuum of Care Network Authorization Form

Exhibit 1-HMIS Contact Sheet

Position	Agency	Contact Person	Phone	Ext
HMIS Provider	MISI	Deb Little	(800) 536-6474	
Lead Agency	Embarras River Basin Agency, Inc.	Susie Beaumont	(217) 923-3113	
HMIS Coordinator	Embarras River Basin Agency, Inc.	Larry Sullivan	(217) 345-4840	23
Participating Agency	CEFS Economic Development Corp	Cindy Mayer	(217) 342-2193	121
Participating Agency	Illinois Valley Economic Development	Stephanie Stahlhut	(217) 839-4431	
Participating Agency	Mattoon Area PADS	Michael Stopka	(217) 234-7237	
CoC Member	Hope of East Central Illinois	Angie Hunt	(217) 348-8815	

Exhibit 2 – Summary of Data Standards

Summary of Data Standards Applicability and Collection Requirements					
The data standards establish uniform definitions for the types of information to be collected and protocols for when data are collected and from whom. The following tables group the HMIS data Elements by type (Program Descriptor, Universal, And Program Specific) and summarize the requirements regarding: 1) applicability of each data element: 2) From whom the data is collected (for client-specific data elements): and 3) when the data is collected.					
Universal Data Elements					
The Universal Data Elements establish the baseline data collection requirements for all participating HMIS Programs. The Universal Data Standards are the basis for producing unduplicated estimates of the number of homeless people accessing services from homeless assistance providers, basic demographic characteristics of people who are homeless, and patterns of service use including information on shelter stays and homelessness episodes over time.					
Universal Data Elements					
Data Standards	subjects		When Collected		
	All Clients	All Adults	Initial Program Entry Only	Every Program Entry	Every Program Exit
1 Name*	x		x		
2 Social Security Number*	x		x		
3 Date of Birth*	x		x		
4 Race*	x		x		
5 Ethnicity*	x		x		
6 Gender*	x		x		
7 Veteran Status		x		x	
8 Disabling Condition	x			x	
9 Residence Prior to Program Entry		x		x	
10 Zip Code of Last Permanent Address		x		x	
11 Housing Status	x			x	x
12 Program Entry Date	x			x	
13 Program Exit Date	x				x
14 Personal Identification Number	x		x		
15 Household Identification Number	x			x	
* Note that one or more of these personal identifiers may need to be asked on subsequent visits to find and retrieve the clients record. However, this information only needs to be recorded in HMIS on an initial program entry.					

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Program-specific Data Elements						
<p>Program-specific data elements provide information about the characteristics of clients, services that are provided and client outcomes. Most of these data elements must be collected from all clients served by COC programs in order to complete Annual Performance reports (APRs) and to measure performance outcomes. Program Specific Data elements must be captured at program entry and exit. Some must be captured on a quarterly and annual basis.</p>						
Summary of Program Specific Data Elements						
Data Standard	Program Applicable	Subject	At or Near Client Entry	At least once every three months	At least once annual	Every Exit
1. Income	all	All Clients	x	x	x	x
2 Non Cash Benefits	all	All Clients	x	x	x	x
3 Physical Disability	all	All Clients	x		x	x
5 Chronic Health Condition	all	All Clients	x		x	x
6 HIV/AIDS	all	All Clients	x		x	x
7 Mental Health	all	All Clients	x		x	x
8 Substance Abuse	all	All Clients	x		x	x
9 Domestic Violence	all	Adults and Youth	x			
10 Destination	all	All Clients				x
11 Date of Contact	all	All Clients	x			
12 Date of Engagement	all	All Clients	x			
13 Financial Assistance Provided	all optional	All Clients		x		
Housing Relocation Stabilization Services	ESG	All Clients		x		x

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Additional Program Specific Data Elements										
In addition to the data elements that are required for APR reporting, some additional program-specific data elements must be collected.										
Data Standard	Program Requirements	Subjects					When Collected			
		All Clients	All Clients or All Adults	All Females of Child-bearing Age	All Veterans	All Children	Every Entry	At Least Once Annually	When Services Provided	Every Exit
Employment	Required		x				x	x		x
Education	Optional		x				x	x		x
General Health Status	Optional		x				x	x		x
Pregnancy Status	Optional			x			x	x		x
Veteran's Information	Required				x		x			
Children's Education	Optional					x	x	x		x
Reason for Leaving	Required	x								x
Services Provided	Required								x	

Exhibit 3 – Agency Participation Agreement

South Central Illinois Continuum of Care
Homeless Management Information System

Agency Participation Agreement

By and Between
South Central Illinois Continuum of Care

and

Agency Name _____

The SCICoC HMIS Participation agreement is made between the South Central CoC and _____, an Illinois nonprofit corporation located at _____ (“Agency”).

Whereas, Agency participates in the SCICoC Homeless Management Information System (HMIS), for the collection of data concerning persons experiencing homelessness and those in imminent danger of homelessness in the service area covered by the CoC and the use of that data to insure that appropriate, non-duplicative services are provided to those persons: and

Whereas the SCICoC has chosen ServicePoint provided by Municipal Systems Incorporated (MISI), in collaboration with Pathways Compass to be used for case management, determining utilization of services and gathering information on client demographics as required by HUD and the COC minimum Data Standards.

Now, therefore, in consideration of mutual promise contained in this agreement, SCICOC and Agency hereby agree as follows.

I. Definitions

- A. “Agency” means the agency that is party to this agreement.
- B. “Client” means a consumer of services provided by or through Agency.

- C. “Participating Program” Means a contributory program who records data elements regarding clients served and discloses these data elements through agreed upon means to the Lead HMIS agency.

II. ServicePoint Use and Data Entry

- A. Agency shall comply with the policies and procedures applicable to agencies participation in the HMIS and using ServicePoint. Modifications to the HMIS policies and procedures may be made by the SCICOC for the purpose of fulfilling the HUD requirements or as needed to ensure the efficient collections of client data. Additional updates to this manual will be provided electronically by the HMIS Coordinator, or HMIS Committee Chair.
 - 1. All users of ServicePoint at or under control of Agency are required to have completed training designated by ServicePoint or Pathways Compass before using the database.
 - 2. Agency shall only enter individuals or households that are Clients, or individuals or households seeking assistance from the Agency. It is not required that individuals or households receive service to be entered in to the HMIS.
 - 3. Agency shall enter information into the HMIS in a consistent manner and strive for real-time, or close to real-time data entry. All data should be entered within two business days of services.
- B. Agency shall not alter information in the HMIS database by another participating program. The exception is HMIS coordinator assisting agency with data issues.
- C. Agency shall not cause the corruption of HMIS database in any manner.
- D. Agency shall enforce all user policies to which it employees and agents are subject.
- E. Agency shall not include or transmit any material in violation of any federal or state law or regulation. This includes, but is not limited to, copyrighted material, material legally judged to be threatening or obscene, and material protected by trade secret.
- F. Agency shall not use the HMIS database for the purpose of defrauding federal, state, or local governments, individuals or entities, or to conduct illegal activity.

III. Training and Technical Assistance

- A. SCICOC shall assure that the HMIS training information is provided for the necessary training of Agency Staff. HMIS Coordinator will provide training updates as necessary and reasonable due to staff changes and changes in technology.
- B. MISI will assure that HMIS technical personnel are available for agency administrators for technical issues regarding the HMIS.

IV. Confidentiality

- A. Agency shall comply with all applicable federal and state confidentiality regulations and laws that protect Client Information and Records, and Agency shall only release Client Records with written consent by the Client or when required by law.
1. Agency agrees to abide by all relevant state and federal confidentiality regulations relevant to the population served by the Agency.
 2. Agency shall provide a verbal explanation of the HMIS database and the terms of consent to each adult Client and shall arrange for a qualified interpreter or translator in the event that an individual is not literate in English or has difficulty understanding the consent form.
 3. Agency understands that data entered into ServicePoint is stored in a HIPPA compliant data center.
 4. Agency shall utilize a South Central Illinois CoC HMIS Consent form for all clients. Once signed, or verbal permission if phone consent, by the Client it authorizes Client data to be entered into or viewed in the HMIS.
 5. Agency shall ensure that all staff, volunteers, and other persons issued a user ID and password for Service Point receives information and training concerning the Confidentiality of Client information and signs the user policy in the form attached to this agreement as attachment.
 - a. A signed copy of the User Policy shall be forwarded to the HMIS Administrator for the purposes of system oversight.
- B. Agency understands that it is the owner of its own agency-specific Client Data and shall not be denied access to that Client data. Agency acknowledges that it does not own Client data entered by other Participating Programs, even if Agency has entered into a memorandum of Agreement (“MOA”) with the other Participating Programs. In accessing Client data of other Participating Programs (with that Agency/Program’s approval), Agency shall be bound by all restrictions placed upon the data by the Client of the other Participating Programs.
- C. Agency shall obtain the appropriate Client Release of Information signed by its Client before sharing any specific and identifiable Client Information with other Participating program(s). Agency shall not share any identifiable Client Information with other Participating Program(s) unless agency has executed a Coordinated Service Agreement with other Participating Programs(s) with which the information will be shared and the Coordinated Service Agreement conforms to the requirements of this agreement and the HMIS policies and Procedures Manual.
1. Agency shall keep signed copies of the Client Release of Information for a period of three years.

2. If a Client withdraws consent for release of information, Agency shall ensure that the Client's information that has not already been released under the prior consent will be unavailable to any other Participating Program(s) from the date of withdrawal of consent forward.

V. HMIS Security

A. MISI, and Bowman Systems shall be responsible for the following:

1. Overall System Administration and Maintenance.
2. Validating and establishing security clearances to participating agencies.
3. Ensuring that security procedures are followed.
4. Trouble shooting and technical assistance to agencies.

B. Agency acknowledges and understands that the HMIS Provider and HMIS Coordinator will have access to identifiable Client data.

C. Agency is obligated to ensure that within 24 hours of a change affecting the Agency, the HMIS Coordinator has current and accurate information as to the Agency User information.

D. Agency is obligate, once identified, to rectify any violations of this agreement.

VI. Access to Data

A. Agency's access to data on Clients it does not serve shall be limited to non-identifying and statistical data unless sharing of identifiable Client data is allowable under an executed Coordinated Services Agreement that conforms to the terms of this Agreement.

B. HMIS Coordinator or other staff may make aggregate data pertaining to services for homeless persons available to the CoC for funding or planning purposes. However, such aggregate data shall not directly identify individuals Clients and shall not include any of the items identified as HUD defined Protected Personal Information.

VII. Other Terms and Condition

A. SCICoC, HMIS Coordinator shall not be liable to Agency for any cessation, delay or interruptions of any HMIS services, nor for any malfunctions of HMIS hardware, software, or Equipment.

B. This Agreement shall be in force until terminated in writing by either party. Without limiting the generality of the forgoing or the right of SCICoC to terminate this Agreement for any

reason, SCICOC may terminate this Agreement if funding for HMIS or any part thereof becomes unavailable or is restricted.

IN WITNESS WHEREOF, SCICoC and Agency have executed this Agreement by their respective authorized representatives.

By _____ Date _____

SCICoC Representative

By _____ Date _____

HMIS Coordinator

By _____ Date _____

Agency Representative

Printed Name _____

Title or Capacity: _____

Exhibit 4 – User Agreement

**South Central Illinois Continuum of Care
Homeless Management Information Systems
User Policy Agreement**

User _____

Print Full Name of User

User Work Phone Number: _____

User Work E-Mail: _____

Agency: _____

Print Name of Agency

PRIVACY AND DATA ACCESS

Consistent with client permission and restrictions, agencies using the SCICoC HMIS shall at all times have rights to the data pertaining to their clients entered by them. SCICoC HMIS the agency and any partner agencies with access to data through a Release of Information shall be bound by all restrictions imposed by the client pertaining to any use of that client’s personal information.

SCICoC HMIS and ServicePoint are tools to assist agencies in focusing services, locating alternative resources to help people experiencing homelessness, and to meet State and Federal reporting requirements. Designated MIS staff will provide training, assistance and support for using ServicePoint and assist in resolving data and database issues.

USER POLICY

SCICoC HMIS, ServicePoint users will comply to the best of their ability, with both the procedures and policies of their agency and those HMIS policies and procedures relating to the SCICoC HMIS data. However, whenever there is a question, the HMIS policies and procedures must take precedence over agency policies. Minimum data entry on each consenting client will be the data in the HUD Universal Data Elements plus any additional data required by the agency or other commitments.

USER RESPONSIBILITY

Your user ID and Password give you access to your agency’s data in the HMIS system. Initial each item following to indicate your understanding and acceptance of proper use of this access.

Failure to uphold the confidentiality standards set forth below is grounds for immediate termination from the SCICoC HMIS System.

- _____ My user ID and password are for my use only and will not be shared with anyone.
- _____ I will take all reasonable precautions to keep my password physically secure.
- _____ I will never let anyone else know my password, use my password, or access the SCICoC HMIS using my password.
- _____ I will only let individuals who are authorized to view information in the HMIS System (or Clients to whom the information pertains).
- _____ I will only view, obtain, disclose or use the database information that is necessary to perform my job.
- _____ I will not leave a computer, where I am logged into the HMIS unattended.
- _____ I will log-off the HMIS before leaving the work area even for a very short period of time.
- _____ I understand that failure to log off the HMIS appropriately may result in a breach in client confidentiality.
- _____ I will assure that any and all printouts/hard copies of HMIS information must be kept in a secure file.
- _____ I will assure that any printouts/hard copies from the HMIS will be shredded or otherwise properly destroyed or maintain confidentiality when no longer needed.
- _____ If I notice or suspect a security breach, I will immediately notify my Agency Administrator.

USER CODE OF ETHICS

- A. Users must be prepared to answer client questions regarding SCICoC HMIS.
- B. Users must faithfully respect client preferences with regard to the entry and sharing of client information within SCICoC HMIS. Users must accurately record Client's preferences by making the proper designations as to sharing of Client information and/or any restrictions on the sharing of Client information.
- C. Users must allow client to change his or her information sharing preferences at the client's request.
- D. Users must not decline services to a client or potential client if that person (i) refuses to allow entry of information into SCICoC HMIS (except if that policy is over-ridden by agency policy); or (ii.) refuses to share his or her personal information with other service providers via SCICoC HMIS.
- E. User has primary responsibility for information entered by the User. Information Users enter must be truthful, accurate and complete to the best of User's knowledge.

- F. Users will not solicit from or enter information about clients into SCICoC HMIS unless the information is required for a legitimate business purpose such as to provide services to the client.
- G. Users will not alter or override information entered by another Agency.
- H. Users will not include profanity or offensive language in SCICoC HMIS; nor will Users use SCICoC HMIS database for any violation of any law, to defraud any entity or conduct any illegal activity.
- I. Upon client request, users must allow a client to inspect and obtain a copy of the client's own information maintained within SCICoC HMIS. Information compiled in reasonable anticipation of or for use in a civil, criminal or administrative action or proceeding need not be provided to Client.
- J. Users must permit Clients to file a written complaint regarding the use or treatment of their information within SCICoC HMIS. Client may file a written complaint with either the Agency or with the Lead Agency, Embarras River Basin Agency, 400 W. Pleasant, Greenup, IL 62428. Clients may *not* be retaliated against for filing complaints.

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

_____ **Date**

SCICoC HMIS User

_____ **Date**

Agency Supervisor

Additional Information

Date of Initial HMIS Training _____

Exhibit 5 – South Central Continuum of Care Network Authorization Form

**CLIENT INFORMED CONSENT &
RELEASE OF INFORMATION AUTHORIZATION**

For South Central Illinois Continuum of Care Homeless Management Information System

Agency: _____
 Agency Address _____
 (City, State, Zip)
 (Phone)

What you are consenting to? This Agency is a participating agency in the South Central Illinois CoC (SCICoC) Homeless Management Information System (HMIS). HMIS participating agency work together to provide services to persons or families experiencing housing instability. When you request services, data may be collected about you and your household that may be shared with other HMIS participating agencies.

How the data will be used? Your information will be used for statistics, such as number of persons that are homeless or at risk of homeless and reporting numerical information to funding providers as required by State or Federal Grants. The information may also be shared with other agency partners for the purpose of service coordination. The specific way in which your information will be used or disclosed is outlined in HMIS policy and procedures manual. You may request a copy of South Central Illinois CoC HMIS policy and procedures manual at any time.

How is my data protected? The data is stored in both hard copy and in an online database called ServicePoint. ServicePoint is a shared homeless and housing management information system administered by Municipal Information System, Inc. The ServicePoint system operates over the Internet and uses many security protections to help ensure confidentiality.

How do you benefit by providing requested information and sharing it with other agencies? By sharing your information, you may be able to avoid being screened again, receive service faster, and minimize how many times you have to tell your story. If housing services are not available at time of original intake, you would be placed on a list so that as housing options become available, you can be contacted.

What information is collected: Primary information such as name, social security number, and date of birth, gender, race, ethnicity, and veteran status is collected. Also collected is housing status, assessments, and information on services provided.

By signing the form I agree that I have read or have had read to me the above information and agree to share the following level of information with other HMIS participating Agencies, partnering agencies and when applicable the Veteran’s Administration:

- I agree to share all information with partnering agencies
- I agree to only share my primary information with participating agencies.
- I do not agree to share any of my information with other participating agencies.
- I am a veteran and do not want my information shared with the V.A.

I understand that I may cancel this authorization at any time by written request to the organization that I originally gave the authorization, but the cancellation will not be retroactive. I understand that this release is **valid for five (5) years** from the date of this document.

 Printed Name(s)

 Child

 Child

 Child

 Child

 Child

 Signature of Client, Guardian

 Date

 Signature of Witness

 Date