HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
Data & Performance Committee Meeting Agenda

September 24, 2024, 9:00am

Committee members must participate in person (except for just cause reasons, or personal emergency reasons approved by the HSOC):

Room 356, County of San Luis Obispo Department of Social Services,
3433 South Higuera St, San Luis Obispo, CA 93401

Members with approved just cause reasons and the public may participate by Zoom video call:

https://us06web.zoom.us/j/87316599100?pwd=kmU9L8J0N6o9f6RZFNhbEWV9gDtuip.1

Or dial in:
+1 669 444 9171
Meeting ID: 873 1659 9100
Passcode: 391590

1. Call to Order and Introductions

2. Public Comment

3. Consent: Approval of Minutes

4. Action/Information/Discussion

   4.1. Implementing Five-Year Plan Line of Effort 3 – Improve and Expand Data Management Efforts Through HMIS and Coordinated Entry System to Strengthen Data-Driven Operational Guidance and Strategic Oversight

      4.1.1. Homeless Management Information System (HMIS)

         4.1.1.1. Information Item: HMIS Upgrade Activities Update

         4.1.1.2. Information Item: HMIS System Administrators Monthly Call Report

         4.1.1.3. Information Item: HDIS (Homeless Data Integration System) Bimonthly System Admin Call

4.1.1.4.   Information Item: HMIS Helpdesk Metrics

4.1.1.5.   Action Item: Vote to Approve Recommended Updates to the HMIS Grievance Policy

4.1.1.6.   Action Item: Vote to Approve Recommended Updates and Additions to HMIS Data Quality Management Plan

4.1.1.7.   Discussion Item: Interagency Data Sharing and Agency Agreements

4.1.1.8.   Discussion Item: HMIS Privacy Policy

4.1.1.9.   Discussion Item: Improvements to Client Profiles

4.1.2.   Information Item: Data Workgroup

4.2.   Implementing Five-Year Plan Line of Effort 4 - Create, Identify, and Streamline Funding and Resources

4.2.1.   Discussion Item: System Performance Measures

5. Future Discussion/Report Items

6. Next Regular Meeting: TBA at 9am * (*Request to move the October meeting of HSOC Data and Performance. The team will be at NHSDC in Portland during the scheduled Oct 22 meeting*)

7. Adjournment

The full agenda packet for this meeting is available on the SLO County HSOC web page:

https://www.slocounty.ca.gov/departments/social-services/homeless-services-division/homeless-services-oversight-council

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
DATA & PERFORMANCE COMMITTEE MEETING MINUTES

Date
August 27, 2024

Time
9:00am-10:30am

Location
Room 356, Department of Social Services, 3433 S. Higuera St., San Luis Obispo, CA 93401

Members Present
Christy Nichols
Diana Howard
Janna Nichols
Mark Lamore
Sstoz Tes

Members Absent
Carrie Collins
Jessica Thomas
Kate Swarthout
Kathy McClenathen
Mimi Rodriguez

Staff and Guests
Abby Burgess
Derek Ferree
Jasmine Smith
Jeff Al-Mashat
Kari Howell
Kate Bourne
Laurel Weir
Merlie Livermore
Russ Francis
Suzie Freeman

1. **Call to Order and Introductions**
   Mark Lamore called the meeting to order at 9:00am.

2. Public Comment

There were no public comments presented.

3. Consent: Approval of Minutes

Janna Nichols moved the motion to approve the minutes. Christy Nichols seconded the motion. Voice vote was taken. All were in favor and minutes were approved.

4. Action/Information/Discussion

4.1. Implementing Five-Year Plan Line of Effort 3 - Improve and Expand Data Management Efforts Through HMIS and Coordinated Entry System to Strengthen Data-Driven Operational Guidance and Strategic Oversight

4.1.1. Homeless Management Information System (HMIS)

4.1.1.1. Information: HMIS Upgrade Activities Update

Kate Bourne shared that in the last two months they have been working on the Phase 2 migration activities. Their team has been working on finalizing the custom reports. ICA has provided a lot of expertise at looking at custom reporting ability for programs. They are starting to get a more comprehensive look at the various programs funded in the county that are outside of the absolute necessary to report out of the HMIS realm. They are working with CAPSLO (Community Action Partnership of San Luis Obispo County) one on one to get their shelter operations into the system, to get more users onboard and get their shelter staff into training soon. Kate also added that with their last conversation with BitFocus, they talked about some elements that they were working on with Clarity regarding current living situation ability to track location of clients. The team is also continuing to build out custom assessments. Also, Bitfocus is doing an update to user interface this fall, announcing and unveiling features at Clarity Connect, so staff Staci Dewitt will be going to attend this event in September to get the information and details for these new features.

Kate also mentioned that they are working on finalizing the Phase 2 charter on the migration and expansion project and should be finalized within the next few weeks.

4.1.1.2. Information Item: HMIS System Administrators Monthly Call Report

Staci Dewitt shared that at the monthly report, they called for community examples of system modeling implementation. During this time, there was also an extensive deeper dive into content and some live demos using EVA tools. Staci also mentioned that once this meeting and video is uploaded to the HUD Exchange it will be a really good tool for the agencies to explore and learn from.

4.1.1.3. Information Item: ICA (Institute for Community Alliances) Site Visit

Kari Howell shared that Abby Burgess and Derek Ferree from ICA visited San Luis Obispo from August 5-7. During this time, they visited ECHO (Paso Robles) and toured their Homekey facilities, and had a one-on-one discussion with an ECHO team member to discuss how Clarity is going so far. The following day, the ICA team facilitated an all-day mapping session with the HMIS Steering Committee. This steering committee is

composed of about 23 leaders in the community and the county with a shared commitment to a high functioning HMIS. On Wednesday, ICA and the HMIS support team led an in-person training session for agency administrators. There were 15 attendees from the different agencies, followed up by a lunch with CAPSLO Homeless Services staff. This day also included a site visit to view the additional unit at the Center for Family Strengthening facility in Atascadero. The day closed by an in-person visit with the People's Self-Help Housing.

4.1.1.4. Information Item: HMIS Helpdesk Metrics

Kari Howell reported that they would like to have a new HSOC standing measure to better understand the needs of the users. Since February, the HMIS support team moved forward with a customer service ticketing system called Help Scout. Since then, the team has received more than 1,000 plus messages and had an average resolution time of one day and four hours. Fifty two percent of the tickets were resolved on the first reply. Kari mentioned that they are receiving fewer questions since users become more familiar with the usage of the system. In addition to being the messaging system, Help Scout is also serving as an on-site knowledge base, offering autonomous learning opportunities.

4.1.1.5. Action Item: Vote to Approve Recommended Updates to the HMIS Grievance Policy

This action item is tabled for next meeting to provide more time for members to review.

4.1.1.6. Action Item: Vote to Approve Recommended Updates and Additions to HMIS Data Quality Management Plan

This action item is tabled for next meeting to provide more time for members to review.

4.1.2. Information Item: Data Workgroup

Kate Bourne shared that the first workgroup met on August 20. The purpose for this workgroup is to look at HMIS and other sources of data and discuss how to present gathered data to this committee, other committees and the public.

5.   Future Discussion/Report Items
- Vote Approve Recommended Updates to the HMIS Grievance Policy
- Vote Approve Recommended Updates and Additions to HMIS Data Quality Management Plan

6. Next Regular Meeting
September 24, 2024, at 9:00 am

7. Adjournment
Mark Lamore adjourned the meeting at 10:30am.

San Luis Obispo County Continuum of Care
Homeless Management Information System (HMIS)
HMIS Grievance Form

If you feel a violation of your rights as an HMIS client has occurred or you disagree with a decision made about your Personally Identifiable Information (PII)~~"Protected HMIS Information"~~ you may complete this form. Complete this form only after you have exhausted the grievance procedures at the agency you have a grievance with. **It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.**

Grievances may be submitted in writing to: **Or Via Email to:** SS_HMISSupport@co.slo.ca.us

County of San Luis Obispo
Dept of Social Services_____
Attn: HMIS Lead
3433 S. Higuera St
San Luis Obispo, CA 93401

Date Grievance Filed: _____

Name of Individual who violated your privacy rights.	Name of Agency who violated your privacy rights.

Brief description of grievance (what happened):

Your Name: _____   Best way to contact you: _____

Your Phone #: _____   Your Email Address: _____

Your mailing address:

CoC response date: _____

Recommendation to Agency:

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES
HOMELESS SERVICES DIVISION

HMIS Data Quality Management Plan

DQMP
Version Number 2
Status: Draft
Approvers: HSOC Data & Performance Committee

CONTENTS

DOCUMENT CONTROL

Change Log

Date	Changed By	Description	Reviewed by	Effective Date
12/11/2023	Abby Burgess, Zach Ehmann, Jessica Jones	Initial Version	HSOC Finance & Data	March 2024
8/26/2024	HMIS Lead Staff	Minor edits and addition of Appendix A		

Distribution List

Date	Name	Title	Status

INTRODUCTION

Purpose

The San Luis Obispo County CoC Data Quality Management Plan (DQMP) articulates the CoC's goal to continuously improve the completeness, timeliness, accuracy, and consistency of its data and establishes the policies and procedures for meeting this goal as a community. This document aims to provide all participating entities with a shared context for the plan and a clear understanding of their roles and responsibilities in its execution.

Administrative Scope:

This document was expanded and updated as part of the implementation of the Clarity Human Services HMIS software and will contain the required information to maintain the HMIS after implementation.

CoC Data Systems

The CoC is required to gather information on all persons experiencing homelessness and all homeless service providers (sometimes called "Covered Homeless Organizations") within their geographic jurisdiction. While the CoC is required to collect HMIS data elements using a single centralized database for federal reporting purposes and is charged with expanding its coverage, statutory and practical limitations introduce other systems of record into the CoC's data ecosystem.

The sections below define the two types of databases that are subject to this DQMP. Collectively, these are referred to as the **CoC Data Systems**.

Homeless Management Information System

HMIS serves as the primary system of record for all federally funded projects. Clarity Human Services is administered by San Luis Obispo County Homeless Services Department as the CoC's designated HMIS Lead, and the software vendor is Bitfocus. The required structure and baseline functionality of the system is defined according to the HMIS Data and Technical Standard Final Notice (July 2004).

DV Comparable Databases

CoC-participating Victim Service Providers (VSPs) that are funded to serve survivors of domestic violence are prohibited from participating in the CoC's designated HMIS and instead are required to utilize a "comparable database" that mirrors the capability of HMIS while complying with stricter privacy regulations. VSPs that receive HUD funding are still required to contribute to the CoC's reporting through the provision of aggregate data and through limited client-permitted data sharing for service coordination. Requirements are documented in the HMIS Comparable Database Manual.

Attachment 4_1_1_6
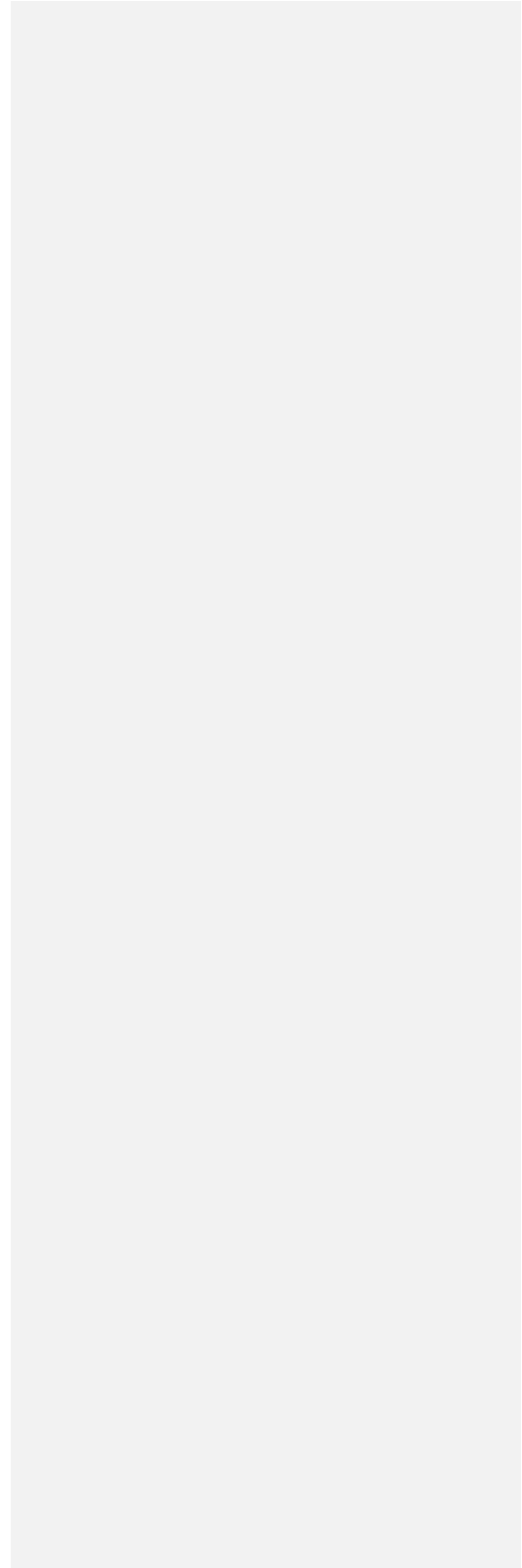
COC, HMIS LEAD AND HMIS PROVIDER STAFFING

Roles and Responsibilities

List the key stakeholders involved in this procedure. For each stakeholder, specify their roles and responsibilities related to the Data Quality Plan. Clearly define any specific tasks or obligations they have.

Title	Description of Role	Tasks
HMIS Program Manager	Management of HMIS Assigned initiative (PIT, etc.) and policy issues. Vendor management.	Oversight, review, and support of policy and procedures. Ensure adherence to data quality management plan, monitoring process and compliance.
Program Review Specialist	System Administrator role in application.	Assist in identification and correction of data quality issues with HMIS Providers. Provide support, technical assistance and training.
Business Systems Analyst	Lead on system administration and data / reporting.	System Administration tasks. Ensure data quality reports are available and accurate. Create self-monitoring tools for data quality. Assist in identification and correction of data quality issues with HMIS Providers.
Implementation Partner	Provide subject matter expertise and technical assistance to Homeless Services Department and HMIS Team.	Understand data quality elements required by HUD and Federal Partner programs. Systematically monitor the data. Communicate regularly with CoC and HMIS Providers to ensure resources are available to address data quality concerns. Support creation of data quality management plan and subsequent tools/ reports to support the implementation of the plan.
HSOC Data and Performance~~Finance~~ Committee (or designated sub-committee for HMIS Data and Reporting functions)	HMIS Oversight	Review and approve data quality plan. Set data quality benchmarks. Review data quality reports. Determine expectations for monitoring and compliance. Work with providers and the HMIS lead to develop and implement solutions for improving data quality. Consider

		data quality in the rating and ranking process for funding decisions.
HMIS Providers/ Participating Agencies	Adherence to HMIS policies and procedures, including the data quality management plan.	Set the tone for the agency's commitment to data quality. Monitor a project's data quality. Prepare for APR/ funding report requirements. Resolve any data quality findings as quickly as possible
HMIS Agency Administrator (s)	Serve as the primary contact (s) for all communications regarding the quality of data entered into CoC data systems.	Serve as a subject matter expert for the HMIS Provider. Support agency end users with system navigation and data quality. Ensure end users receive necessary training for HMIS. Maintain quality and accuracy of client data, user data and project information for the agency. Communicate project and funding updates and change to HMIS Lead, including changes to bed/ unit inventory. Review project set up requests and custom report request prior to submission to HMIS Lead.
HMIS End Users	HMIS Data Entry and adherence to HMIS policies and procedures, including the data quality management plan.	Enter data with completeness, accuracy, timeliness, and consistency.

HMIS DATA QUALITY RESOURCES

HUD's existing HMIS documentation and guidance serves as a key reference point for the CoC DQMP. The HUD Exchange links below provide access to the most recent versions of relevant documents considered in the formulation of the DQMP:

- HMIS Data Standards (*HMIS Data Dictionary* & *Data Standards Manual,* updated biannually)
- CoC Data Quality Brief (May 2017)
- System Performance Improvement Briefs (July 2017)
- SNAPS Data TA Strategy to Improve Data and Performance (September 2018)

HMIS DATA TYPES & CONVENTIONS

For the purposes of the DQMP, HMIS data elements are grouped into four types. Universal Data Elements (UDEs), Program Specific Data Elements (PSDEs), and Project Data Descriptor Elements (PDDEs), are designations derived from the HUD Data Dictionary. "Administrative" data elements reflect measures of data quality that are derived from data system metadata and calculated performance metrics rather than a discrete field in a database.

Project Data Descriptor Elements (PDDEs)

The Project Descriptor Data Elements (PDDEs) contain basic information about projects in CoC data systems. PDDEs are the 'building blocks' of these systems, enabling the following functions:

- Marking project data for inclusion or exclusion for federal reporting;
- Association of client-level records with the various projects in which clients will enroll in across project types;
- Definition of the type of project with which the client is associated the entire time they received housing or services;
- Identification of federal partner programs providing funding to the project; and
- Documentation of bed and unit inventory and other information relevant for federal reporting and strategic planning related to system capacity and utilization.

PDDEs are entered and managed by CoC data system administrators in collaboration with each CHO. They are created at initial project setup within the data system and updated as changes occur to project or funding and are subject to annual review by data system administrators.

HUD requires that the CoC (typically via the data system Lead) collect project descriptor information for all continuum projects within its jurisdiction participating in CoC data systems by collecting and entering client-level HMIS data elements as well as all residential continuum projects, regardless of their participation in CoC data systems. If the databases include client and service data entered by non-continuum projects (e.g., food pantries or other services that might be used by people who are not experiencing homelessness), the continuum must identify them as such using the PDDEs to ensure that data are excluded from required reporting on continuum projects.

Universal Data Elements (UDEs)

The Universal Data Elements (UDEs) establish the minimum data collection requirements for all CHO projects entering data into CoC data systems, regardless of funding source. The Personally Identifiable Information (PII) and UDEs (3.01 through 3.07) must be collected once per client, regardless of how many project stays that client has in the system. The remaining UDEs (3.08 through 3.917) are to be collected at least once per project stay.

Program Specific Data Elements (PSDEs)

The Program Specific Data Elements (PSDEs) have been designed by HUD to allow projects that receive funding from any HMIS Federal partners. As such, requirements to collect specific PSDE's vary based on funding source and project type. The HUD Exchange Federal Partners landing page serves a gateway to the manuals that provide the specific PSDE data collection requirements per program and project type.

PSDEs, as defined by HUD, provide additional information about the characteristics of clients, the services they are provided, and program outcomes. Many of these data elements represent repeated transactions and were designed to collect information that may change over time. The "Common Program Specific Data Elements," which are the PSDEs that are collected across most Federal
Partner programs, are presented in the table below.

Administrative Data Quality Measures

This document defines "Administrative Data Quality Measures" as metrics derived from other HMIS elements that establish validity or describe the relationship between data captured in the CoC data systems and the overall amount of data available in the community it is charged with collecting.

- **Timeliness** refers to the number of days between when information was effective and when that information was entered into the CoC Data System.

- **Bed/Unit Coverage** refers to the percentage of non-VSP homeless-serving projects' residential capacity and utilization is captured in HMIS. It is a function of a project's overall HMIS-participation status. The CoC aims to have this be as close to 100% as possible.

- **Utilization** refers to the occupancy percentage for available units/beds in CoC residential projects. Overly high or low utilization may reflect issues with PDDE data that must be corrected by data system administrators.

- **User Metadata** are captured automatically by CoC Data Systems and are used to understand the patterns of system access and data entry for organizations.

Missing Data Responses to HMIS Elements

Required HMIS data elements left blank in CoC data systems are considered "missing" for data quality purposes. However, to distinguish between cases where data collection was not attempted or recorded and those where a client declined to provide the information, most required HMIS data elements provide the options "Client doesn't know," "Client prefers not to answer," and/or "Data not collected" to be recorded in place of a blank value. **Although non-blank, these *may* have a negative impact on data quality.**

It is not the intention of HUD, Federal Partners, or the San Luis Obispo County CoC that clients be denied assistance if they refuse or are unable to supply the information. However, some information may be required by projects or public or private funders to determine eligibility for housing or services or to assess service needs.

Usage of "Client Prefers Not to Answer" and "Client Doesn't Know" Responses

These options are considered poor data quality but are provided to allow a response to be recorded for elements required to proceed with an assessment when a client is unwilling or unable to provide a response. These are never to be used in place of asking a client for information or in a situation where there was no opportunity to collect information. It is expected that service providers will attempt to collect responses to all required fields and develop rapport with clients to encourage responsiveness.

Usage of "Data Not Collected" Response

CoC data systems may require users to input a non-blank response for required HMIS data elements. In cases where information was not collected or is unknown to the end user entering the data, this response may be used. However, it is expected that this will be a last resort when information cannot be obtained through reference of other records or consulting the client.

Automatic Exits & Exit Destination Completeness in HMIS

Upon agency request and subject to existing policies and procedures, CoC HMIS system administrators may set up projects to automatically exit clients after a set number of days of non-activity. This approach is most often employed to reduce data entry burden and address Exit record timeliness issues for Street Outreach projects and Emergency Shelter projects utilizing a Night-by-Night workflow. However, their use comes with significant trade-offs for data quality: faulty exits may be created if contact/bed night services are not recorded in a timely manner, and all system-generated exits will have missing data for the Exit Destination element. At this time, there is no uniform requirement to utilize either an automated or manual workflow. CoC leadership reserves the right to approve or deny automation requests based on the expected impact to data quality.

Data Quality Standards

This section defines the data quality standards to which CHOs and CoC Data System administrators are held accountable under the DQMP. The table below the next page shows the minimum benchmarks within each sub-component of the DQMP. In cases where sub-components encompass multiple data elements, the standard applies equally to each element rather than being an average of performance across elements. Sub-sections following this table provide additional information on these sub-components and procedural requirements that go beyond the data quality benchmarks listed.

Data Quality Benchmark Minimums by Project Type	CE	HP	ES (E/E)	ES (NbN)	PSH / OPH	RRH	SO[1]	SSO	TH
Project Descriptor Data Elements (PDDEs) (Completeness)	95%	95%	95%	95%	95%	95%	95%	95%	95%
Completeness: Universal Data Elements (UDEs)	90%	90%	80%	80%	95%	95%	80%*	80%	90%
Completeness: Program Specific Data Elements (PSDEs)	90%	90%	80%	80%	95%	95%	80%*	80%	90%
Timeliness	95%	95%	95%	95%	95%	95%	95%	95%	95%
Accuracy	95%	95%	95%	95%	95%	95%	95%	95%	95%
Consistency[2]	95%	95%	95%	95%	95%	95%	95%	95%	95%
CoC Data System Bed/Unit Coverage: Federally Funded	N/A	N/A	100%	100%	100%	100%	N/A	N/A	100%
CoC Data System Bed/Unit Coverage: Non-Federally Funded	N/A	N/A	85%	85%	85%	85%	N/A	N/A	85%
Bed Utilization	N/A	N/A	65% - 105%	65% - 105%	85% - 105%	85% - 105%	N/A	N/A	65% - 105%

Project Type Key				
CE	Coordinated Entry	**RRH**	Rapid Re-housing	
HP	Homelessness Prevention	**SO**	Street Outreach	
ES (E/E; NbN)	Emergency Shelter (Entry/Exit workflow; Night-by-Night workflow)	**SSO**	Supportive Services Only	
PSH / OPH	Permanent Supportive Housing / Other Permanent Housing	**TH**	Transitional Housing	

Standards for Project Descriptor Data Elements (PDDEs)

As CHOs do not enter PDDE information directly, meeting PDDE benchmarks requires active participation in CoC Data System information gathering and monitoring processes. In

---

[1] For UDE & PSDE Completeness, only considers clients with a Date of Engagement in the period, indicating that the client has agreed to actively participate in case management services.
[2] Depending on the element, calculated based on either level of individual administrative events or agency users.

addition to responding to *ad hoc* requests for information in a timely manner, **CHO's are required to notify the CoC data system leads of any project and funding changes (including updates to bed/unit inventory) by the 5th business day of month immediately following the month the update/change occurs.** Updates and changes to PDDEs in HMIS can be communicated to the CoC HMIS System Administrator by submitting an (HMIS Project Set Up Form or Change Form TBD).

Standards for Client, Enrollment, & Assessment Data (UDEs & PSDEs)

In its CoC Data Quality Brief, HUD identifies data quality for client, enrollment, and assessment data as having four components: completeness, timeliness, accuracy, and consistency. The tables below provides a brief overview of these components, whereas the following sections address the standards the DQMP applies to CHOs.

Completeness	Timeliness	Accuracy	Consistency
All clients entered	Data are entered soon after collection	Truthfulness from clients	Common interpretation of questions
Complete identifying data entered	Changing data are kept up to date	Accurate data entered by staff	Common interpretation of client answers
Complete characteristics fields entered		Logical discrepancies between data elements entered for the same client are minimized	Common knowledge of what fields are required
All required enrollment, service, assessment, and exit data entered			

Completeness

HUD's CoC Data Quality Brief defines data completeness as "The degree to which all required data is known and documented." For the purposes of the DQMP's standards, completeness is measured as the percentage of non-missing values for each non-administrative HMIS data element at each point of data collection.

The San Luis Obispo County CoC encourages all CHOs contributing to its data systems to aspire to 100% collection of all data elements but recognize that this may not be realistic or possible in all cases. To further support continuous data improvement in this area, the CoC has created minimum percentage requirements for data completeness, which apply equally to each element of the UDE and PSDE data types, respectively.

Timeliness

The San Luis Obispo County CoC encourages all CHO's to aspire to 100% of data being entered into CoC Data Systems in a live and timely manner to facilitate HMIS being a tool for day-to-day business operations. However, the CoC recognizes that this may not be realistic or even possible in all cases, and therefore have created the following minimum requirements for data timeliness based on project type:

Project Type	Client Event	Timeliness Standard (time between event occurrence and data entry)
Coordinated Entry	Current Living Situation	Within **48 business hours** of client contact/service
	Entry	Within **48 business hours** of client contact/service
	Exit	Within **48 business hours** of client contact/service
Homelessness Prevention	Entry	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service
Emergency Shelter (Entry Exit workflow)	Entry	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service
Emergency Shelter (Night-by-Night workflow)	Current Living Situation	Within **72 business hours** of client contact/service
	Entry	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service[3]
Permanent Supportive Housing / Other Permanent Housing	Entry	Within **72 business hours** of client contact/service
	Move-in	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service
Rapid Re-housing	Entry	Within **72 business hours** of client contact/service
	Move-in	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service
Street Outreach	Entry	Within **72 business hours** of client contact/service
	Current Living Situation	Within **72 business hours** of client contact/service
	Exit (completed or terminated program)	Within **72 business hours** of client contact/service
	No-Contact Exits	After 90-days of no contact, project exit needs to be recorded by the end of the 93rd day of no-contact.
Supportive Services Only	Entry	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service
Transitional Housing	Entry	Within **72 business hours** of client contact/service
	Exit	Within **72 business hours** of client contact/service

---

[3] Users should back-date to the date of last shelter night stay, NOT the date the client did not return.

Accuracy

Data quality measures of accuracy consider the degree to which the information present in CoC Data Systems reflect the actual situations of clients. Data accuracy is not easy to manage or monitor, requiring reference to sources of documentation external to CoC Data Systems as well as regular auditing of responses in the data systems for internal logical congruence.

External Record Standard

To ensure accurate reporting of events, CoC leadership will cross-reference CoC Data System data against internal agency documentation as part of the annual HMIS monitoring process. **The goal is that 100% of client external agency records match the client's information entered into the CoC Data Systems, but a minimum of 95% is acceptable.**

Data System Correction Standard

Due to the complexity of data accuracy, specific standards have not been developed. Some amount of data incongruity may be unavoidable; however, CHO's should strive to minimize data incongruity that occurs. It is expected that CHOs will respond to requests to correct internal Data System accuracy errors within the timeframe parameters of the request. It is expected that accuracy corrections may be included as part of the quarterly Data Quality Monitoring process.

Known accuracy issues that may be included in cleanup requests will be updated in this plan after review of the new HMIS software system logics and common data quality issues.

Consistency

Data consistency means that data is understood, collected, and entered in the same way across all projects in CoC Data Systems. The CoC Lead will work with CoC Administrative Partners to ensure congruence across data systems, while CHOs are expected to meet the following standards by through their user management practices.

Initial User Training Standard

All CHO's data-contributing staff must complete an initial training prescribed by the CoC & HMIS Leads before being granted access to any of the CoC Data Systems. **It is expected that this training will be completed within 15 business days of assignment.**

Annual User Training Standard

For HMIS users, the CoC has established minimum annual HMIS training requirements.

User Activity Standard

End users must log into each CoC Data System to which they have access at least once in a 60-day period to maintain active user status. After 60-days of no use, the user account will be made inactive by the data system administrator.

CoC Data System Bed/Unit Coverage

Bed coverage is the number of homelessness services program beds in the CoC's geographic area that contribute data to the CoC Data Systems. The following project types are considered for this measure:

- Emergency Shelter (ES)
- Transitional Housing (TH)
- Rapid Re-Housing (RRH)
- Permanent Supportive Housing (PSH)
- Other Permanent Housing (OPH)[4]

As a lack of bed coverage limits the CoC's ability to evaluate its clients needs and project performance in addition to reducing the overall comprehensibility of its Data Systems, ensuring that bed coverage is as close to 100% is a high priority for CoC leadership. CoC leadership will focus on project types in the CoC that have less than 85% bed coverage for improvement efforts.

Bed Utilization

Utilization applies to residential (shelter and housing) projects and is measured as the percentage of project inventory that is being used to shelter/house a client in a given period. This measure not only serves to identify issues with client access to resources or bottlenecks in referral processes but also can serve as an indication of inaccurate or incomplete inventory or enrollment data.

The CoC acknowledges that the factors impacting utilization differ between project types and has set benchmarks accordingly. **Emergency Shelter & Transitional Housing projects are to maintain bed utilization between 65% - 105%. Permanent housing projects are to maintain bed utilization between 85% - 105%.**

Situations where a change in inventory records is necessary are defined by HUD in the Data Standards Manual. Refer to the PDDE Data Quality Standards for the requirements for reporting inventory changes.

---

[4] Includes "Housing without Services" and "Supportive Housing without Services" designations.

CHO SELF-MONITORING TOOLS

CHOs are encouraged to self-monitor their data quality performance using reports available in the CoC Data Systems. This section details resources that are currently available for self-monitoring.

HUD Data Quality Report

The HMIS Lead recommends that CHOs run the HUD Data Quality Report to self-monitor **completeness** data quality for the HMIS Universal Data Elements (UDEs). Additionally, this report can be used to verify that enrollment data is up to date by comparing overall client counts against other data sources.

Documentation for running and interpreting this report can be found (future HelpScout Knowledge Base article) and technical specifications can be found within the HUD Standard Reporting Terminology Glossary.

APR & CAPER Reports

The HMIS recommends that CHOs run the CoC / ESG APR and CAPER reports to self-monitor **completeness** data quality for the Program Specific Data Elements (PSDEs). The APR & CAPER reports also provide more detail for **accuracy verification** and **Entry/Exit timeliness monitoring** than the HUD Data Quality Report, including demographic breakouts, client resources and barriers, and program-specific performance measures (e.g., number of outreach contacts prior to engagement; days from enrollment to housing move-in).

EVA Reporting Tool

The HMIS Lead also recommends that HMIS Participating Agencies utilize HUD's Eva reporting tool to conduct a detailed review of errors. Instructions on where to find the Eva tool and how to run the report can be found at the San Luis Obispo HMIS Knowledge Base. HMIS Lead staff will periodically provide these reports to Agencies as part of ongoing data quality monitoring efforts described in the section below.TBD

Report Library

HMIS provides a standard set of "canned" reports that can be used for data quality self-monitoring. These typically allow the user to select a series of parameters on a report setup page, may be run immediately or scheduled, and are easily exportable after running.

The following reports are available (TBD)

DATA QUALITY MONITORING PROCESSES

Routine data quality monitoring at the CoC, CHO, project, and user level will be conducted by the CoC HMIS Lead (in collaboration with Administrative Partners for non-HMIS systems) to ensure the CoC and all its constituent data-contributing CHOs meet the data quality goals defined in this DQMP. In response to findings from monitoring, the CoC HMIS Lead will request corrections and provide support to improve the quality of data at the point of entry into the CoC Data Systems.

The HMIS Lead will perform monthly data integrity checks on the HMIS data, which will include the following steps:

- Run latest version of the HUD Eva Data Quality Tool
- Notify Partner Agency Administrator of findings and timelines for correction;
- Re-run reports for errant agencies/programs, as requested. Follow up with Partner Agency Administrators if necessary;
- Notify Agency Executive Director if Partner Agency Administrators are not responsive to required corrective actions; and
- Notify HSOC Finance and Data Committee regarding any uncorrected data quality issues.

APPENDIX A: DATA QUALITY IMPROVEMENT PLAN

The HMIS Lead will conduct routine data quality monitoring on a monthly basis, as described in the Data Quality Management Plan. In-depth review will be conducted on a rotating basis with each Agency no less than every other year. Agencies will be notified in advance when they are selected for an in-depth review. Agencies that do not meet the CoC Data Quality metrics, may be asked to complete a Data Quality Improvement Plan. Below is the process the HMIS Lead staff will follow to assist an agency in meeting the CoC's Data Quality goals. The Improvement Plan will follow a 3-month timeline aimed at providing opportunities for quality improvement and tailored training to meet agency and end-user needs. Plans can focus on a single project type or multiple project types in an agency, depending on the extent of improvement needed and resource availability.

Preliminary analysis will be initiated with **Table 1** below. It will contain error rates found on the HUD Data Quality Report in HMIS for the 12 months preceding the Improvement Plan. Cells will be highlighted in red, representing data points beyond the maximum error limit. Additional detail will be provided on potential sources of the errors and corrections necessary.

Error Rate (Max)	Data Type	CE	ES EE	ES NBN	HP	PSH, OPH	RRH	SO	TH
5%	**Personally Identifiable Information**								
	Name								
	Social Security Number								
	Date of Birth								
	Race and Ethnicity								
	Gender								
5%	**Universal Data Elements**								

Veteran Status									
Project Entry Date									
Relationship to HoH									
Client Location									
Disabling Condition									

5%	Income and Housing Data Quality								
	Destination								
	Income and Sources at Start								
	Income and Sources at Annual Assessment								
	Income and Sources at Exit								

5%	Chronic Homelessness								
	ES, SH, Street Outreach								
	TH								
	PH								
	CE								
	SSO, Day Shelter, HP								

5%	Timeliness								
	Project Entry Records beyond 72 operating hours								
	Project Exit Records beyond 72 operating hours								

Table 1: A snapshot of the Participating Agency's data quality over the previous 12 months

Outline

If a Data Quality Improvement Plan is determined to be necessary, the HMIS Lead will follow the process below to identify areas for improvement and needed training. The HMIS Lead will determine these in partnership with the Participating Agency by forming a Data Quality Committee for the duration of the project. At the conclusion of the project, the Committee will determine if there has been sufficient improvement to conclude with a Final Report or to continue the effort. The Final Report will include action taken, error rates throughout the project, and feedback from the Participating Agency to the HMIS Lead.

Task ID	Task List	Community Task Lead	Target Date	Completion Date
1	**Month 1: Goal: Assess Baseline of Compliance**			
	Provide initial findings to the Agency Administrators and Agency Leadership	HMIS Lead		
	Agency staff identified to form a Data Quality Committee	HMIS Participating Agency		
	Begin correcting data in system for previous month (Month 0)	HMIS Participating Agency		
	Assess Training Needs and present Training Schedule/Plan	HMIS Lead		
2	**Month 2: Goal: Implement Training and Support**			
	Data Quality Reports for Months 0 and 1 Reviewed by DQ committee	DQ Committee Members		
	Correct Data in system for Month 1 and Month 0 as necessary	HMIS Participating Agency		
	Training Conducted	HMIS Lead		
	Month 3: Goal: Follow-Up Assessment			

3	Data Quality Reports for Months 0, 1 and 2 Reviewed by DQ committee	DQ Committee Members		
	Correct Data in system for Months 0, 1, and 2 as necessary	HMIS Participating Agency		
	Complete Training Plan	HMIS Lead		
	Determine Need to Continue or Conclude Improvement Process	DQ Committee Members		
	Create Final Report of the Improvement Process	HMIS Lead		

DEFINITIONS AND ABBREVIATIONS

Term	Acronym	Definition
Coordinated Entry System	CE	CoC system used to identify persons experiencing homelessness, prioritize them for intervention, make referrals to housing projects, and monitor progress from homelessness to housing.
Continuum of Care	CoC	Federally-defined administrative entity that is composed of homeless serving organizations, administrators, and other stakeholders; charged with ending homelessness in their geographic jurisdiction.
CoC Data Systems	-	Term used in this document to refer collectively to the HMIS and DV Comparable, databases that are used to collect, store, and report on HMIS data elements for CoC purposes.
CoC Lead	-	Organization responsible for administering CoC operations; manages system-wide report submissions and the community's application for CoC funding. San Luis Obispo County is the CoC Lead.
Covered Homeless Organization	CHO	Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes HMIS data elements for persons engaged by the CoC.
Data Quality	DQ	A measure of the validity and usefulness of data. Defined in this case as how accurately it

		portrays the conditions and operations of the CoC community.
Data Quality Improvement Plan	DQIP	Agreement between the CoC Lead and data-entering organization that establishes steps and benchmarks for data quality improvement for the data-entering organization.
Data Quality Management Plan	DQMP	The documented policies and procedures employed by a CoC to move toward its stated goals for data quality improvement and maintenance.
Department of Housing and Urban Development	HUD	Source of the majority of federal funding for CoC-participating organizations that establishes guidelines for HMIS data quality.
Domestic Violence	DV	Also called "inter-personal" or "intimate partner" violence, defined in this case as an experience of violence that qualifies a person for intervention from VAWA- and VOCA-funded entities.
DV HMIS Comparable Database	-	Database type required for DV-serving organizations (VSPs) funded by HUD as a substitute for participation in the CoC's HMIS.
Homeless Management Information System	HMIS	Database structure established by HUD for the collection of homeless services data. HUD-funded CHOs are required to participate in their CoC's HMIS, and the CoC is required to submit annual reports comprised of HMIS data elements.
HMIS Lead	-	CoC administrative entity charged with the operational management of the CoC's HMIS

		software. San Luis Obispo County is the HMIS Lead.
HMIS Participation	-	When A project collects all required data elements according to funder requirements and local CoC Policies and Procedures within the CoC's designated HMIS implementation, or that data is submitted to the CoC's designated HMIS implementation at least once a year to cover the whole year of required client data collected by the project.
Universal Data Elements	UDEs	HMIS data elements pertinent to clients and service interventions that are required across HMIS, regardless of funding type and that are generally applicable across project types.
Program-Specific Data Elements	PSDEs	HMIS data elements pertinent to clients and service interventions that are required by specific funding sources or for specific project type configurations.
Project Descriptor Data Elements	PDDEs	HMIS data elements that pertain to organization and project setup, essential for establishing the framework of service interventions for HMIS data collection and reporting.
Victim Service Provider	VSP	Term for a VAWA- or VOCA-funded organization who has at least one project that is dedicated to serving persons who have experienced DV.

San Luis Obispo County Continuum of Care Homeless Management Information System (HMIS) Agency Participation Agreement

June 22, 2022

<u>Continuum of Care:</u>
CA-614: San Luis Obispo

<u>HMIS Lead Agency:</u>
Department of Social Services
Homeless Services Division
County of San Luis Obispo
3433 S. Higuera St
San Luis Obispo, CA 93401
Telephone: (805) 781-1600

<u>HMIS Partner Agency:</u>
[insert contact info for Partner Agency here]

Contents

1.0 **Introduction and Roles**

As described in the March 2010 Homeless Management Information System (HMIS) Data Standards Revised Notice, an HMIS is an electronic data collection system that stores long-term person-level information about persons who access the homeless services system in a Continuum of Care. HMIS is a valuable resource because of its capacity to integrate and unduplicate data from all homeless assistance and homeless prevention programs in a Continuum of Care. Aggregate HMIS data can be used to understand the size, characteristics and needs of the homeless population at the local, state, and national levels. The HMIS Data and Technical Standards are issued by the U.S. Department of Housing and Urban Development (HUD).

The following HUD HMIS Standards were referenced in the creation of this document:
- 2004 HMIS Data and Technical Standards Final Notice
- Guidance on HPRP Subgrantee Data Collection and Reporting for Victim Service Providers
- 2011 HMIS Requirements Proposed Rule (for informational purposes; not binding)
- 2017 HMIS Data Standards Revised Notice

The **Continuum of Care** is a group composed of representatives of organizations, including nonprofit providers of homeless services, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, veterans service providers, mental health agencies, hospitals, universities, affordable housing developers and law enforcement, that serve homeless and formerly homeless persons and that carry out the responsibilities delegated to a Continuum of Care under HUD's regulations for a particular community. The Continuum of Care is ultimately responsible for oversight and guidance of HMIS but does not manage the day-to-day usage of HMIS.

The **HMIS Lead Agency** provides day-to-day management of system participation, operations, and security. In San Luis Obispo County, the role of HMIS Lead Agency is currently filled by the Homeless Services of the Department of Social Services (3433 S. Higuera St., San Luis Obispo, CA 93401, 805-781-1600).

An **HMIS Partner Agency** is an entity that provides housing or services to people experiencing homelessness, and that enters the resulting data into HMIS and/or uses data from HMIS to inform its clinical or policy decision-making. HMIS Partner Agencies are typically non-profits, government agencies, or health care providers. Each HMIS Partner Agency must agree to uphold the San Luis Obispo County CoC HMIS Policies and Procedures (including the HMIS Policies and Procedures and Security/Privacy Plan, and Data Quality Plan) by executing this HMIS Participating Agency Agreement) with the HMIS Lead Agency. Partner agencies that do not sign the agreement will not be allowed to use HMIS.

References in this document to HMIS plans, forms, standards and governance documents are intended to represent the following versions:

Form title
HMIS Administrative Policies and Procedures
HMIS Participating Agency Agreement
Data Quality Plan
End User Agreement
HMIS Release of Information Authorization
Posted Notice
Privacy Notice

These plans, forms, standards and governance documents are hereby incorporated into this agreement by reference and are available upon request from the HMIS Lead Agency.

2.0 Revision History

This HMIS Participating Agency Agreement shall be reviewed and, if necessary, revised at least annually by the Continuum of Care.

Date	Author	Description
9/16/2020	County of San Luis Obispo Department of Social Services	New document referencing all HUD standards and 2011 HEARTH HMIS Proposed Rule
6/22/2022	County of San Luis Obispo Department of Social Services	Update documents to reflect best practices and community usage.

3.0 HMIS Partner Agency Agreements

The Agency named on p. 1 of this document desires to become an HMIS Partner Agency in the San Luis Obispo CoC. This Agency agrees to:

- Uphold the governing principles of the San Luis Obispo County HMIS as detailed in the San Luis Obispo County HMIS Policies and Procedures and Privacy/Security Plan, and Data Quality Plan.
- Abide by all the policies and follow all the procedures established to govern San Luis Obispo County HMIS detailed in this document and in any other policies and/or documents adopted by the Continuum of Care to govern HMIS, including but not limited to the San Luis Obispo County HMIS Policies and Procedures and Privacy/ Security Plan, the HMIS Participating Agency Agreement, and the End User Agreement.

- Fulfill all the duties designated to a Partner Agency in this document and in any other policies and/or documents adopted by the Continuum of Care to govern HMIS, including but not limited to the San Luis Obispo County HMIS Policies and Procedures and Privacy/Security Plan, the HMIS Participating Agency Agreement, and the End User Agreement.
- Fulfill the duties designated to the Partner Agency in all applicable HUD HMIS Standards.
- Protect the confidentiality of all intellectual property and trade secrets owned by the HMIS vendor, including the design and content of any proprietary reports, software, or source code, with the same care and caution that the Partner Agency uses to protect its most confidential information.
- Ensure that all Agency End Users are trained in compliance with the standards established in the San Luis Obispo County HMIS, including but not limited to the San Luis Obispo County HMIS Policies and Procedures and Privacy/Security Plan, the HMIS Participating Agency Agreement, and the End User Agreement.
- Monitor all Agency End Users' compliance with all the policies established to govern San Luis Obispo County HMIS detailed in this document and in any other policies and/or documents adopted by the Continuum of Care to govern HMIS, including but not limited to the San Luis Obispo County HMIS Policies and Procedures and Security/Privacy Plan, Data Quality Plan, and the End User Agreement, and engage in an internal progressive discipline process as appropriate if incidents of noncompliance are identified; and to report incidents of noncompliance and associated disciplinary actions to the HMIS Lead Agency.

The Agency named on p. 1 of this document understands that:

- Failure to comply with any San Luis Obispo County HMIS plans, forms, standards, and governance documents may result in remediation or sanctions up to and including revocation of HMIS access for a Partner Agency or End User. This may impact the Agency's compliance with funder requirements and eligibility for future funding. The progressive discipline policy for Partner Agency noncompliance is established in the San Luis Obispo County HMIS Policies and Procedures and Privacy/Security Plan.
- HMIS is a shared data system and maintenance of accurate longitudinal information is central to the community's goal of improving service coordination and outcomes through data-driven decision making. For this reason, if the Agency elects to terminate participation in HMIS all Agency information contained in HMIS will remain in HMIS.
- Nothing in this document, or in any of the policies and/or documents adopted by the Continuum of Care to govern HMIS, is intended to preempt federal and state laws regarding collection, storage, and use of Protected Personal Information. Agencies must continue to abide by all federal and state laws, including HIPAA, wherever those laws establish stricter requirements than these policies.

4.0 Continuum of Care Agreements

The San Luis Obispo County Continuum of Care is responsible for ensuring that its HMIS is administered in accordance with all applicable HMIS Data and Technical Standards issued by the U.S. Department of Housing and Urban Development (HUD). The Continuum of Care welcomes the Agency named on p. 1 of this document as a Partner Agency in the San Luis Obispo County HMIS. To support the Agency's successful partnership in HMIS, the Continuum of Care agrees to:

- Authorize access to San Luis Obispo County HMIS for the Agency named on p. 1 of this document.
- Uphold the governing principles of the San Luis Obispo County HMIS as detailed in the San Luis Obispo County HMIS Policies and Procedures and Security/Privacy Plan, and Data Quality Plan.
- Abide by all the policies and follow all the procedures established to govern San Luis Obispo County HMIS detailed in this document and in any other policies and/or documents adopted by the Continuum of Care to govern HMIS, including but not limited to the San Luis Obispo County HMIS Policies and Procedures and Security/Privacy Plan, and the Data Quality Plan.
- Fulfill all the duties designated to the Continuum of Care in this document and in any other policies and/or documents adopted by the Continuum of Care to govern HMIS, including but not limited to the San Luis Obispo County HMIS Policies and Procedures and Security/Privacy Plan, and the Data Quality Plan.
- Fulfill the duties designated to the Continuum of Care in all applicable HUD HMIS Standards.

5.0 **HMIS Lead Agency Agreements**

The Continuum of Care has designated the County of San Luis Obispo as the HMIS Lead Agency for the San Luis Obispo County HMIS. The HMIS Lead Agency agrees to:

- Provide access to San Luis Obispo County HMIS for the Agency named on p. 1 of this document.
- Uphold the governing principles of the San Luis Obispo County HMIS as detailed in the San Luis Obispo County HMIS Policies and Procedures and Privacy/Security Plan, and Data Quality Plan.
- Abide by all the policies and follow all the procedures established to govern San Luis Obispo County HMIS detailed in this document and in any other policies and/or documents adopted by the Continuum of Care to govern HMIS, including but not limited to the San Luis Obispo County HMIS Policies and Procedures and Security/Privacy Plan, and the Data Quality Plan.
- Fulfill all the duties designated to the HMIS Lead Agency in this document and in any other policies and/or documents adopted by the Continuum of Care to govern HMIS, including but not limited to the San Luis Obispo County HMIS Policies and Procedures and Security/Privacy Plan, and the Data Quality Plan.
- Fulfill the duties designated to the Lead Agency in all applicable HUD HMIS Standards.

6.0 Limitation of Liability and Indemnification

The HMIS Lead Agency will make reasonable efforts to promote the security, reliability, and functionality of HMIS for all licensed users. Nevertheless, to the maximum extent permitted by California law, the HMIS Lead Agency, the Continuum of Care, the Collaborative Applicant, and their respective officers, directors, contractors, and staff expressly disclaim any responsibility for any damages caused by or related to server downtime, data errors, data breaches, invasions of privacy, libel, or similar torts. All HMIS-related services are offered as-is, with no warranties, and Partner Agency's use of HMIS is entirely at its own risk.

Moreover, if the HMIS Partner Agency or its staff, contractors, or volunteers negligently cause, allow, facilitate, or permit a breach of private data and/or an unauthorized invasion of privacy, then the HMIS Partner must indemnify the HMIS Lead Agency, the Continuum of Care, the Collaborative Applicant, and their respective officers, directors, contractors, and staff for all associated damages, including reasonable attorney's fees and/or the cost of notifying affected parties of an actual or potential breach, and, where appropriate, providing such parties with resources for identity theft-prevention and/or credit repair.

7.0 **Terms of Agreements**

- This agreement will become effective upon signature by all parties and shall remain in effect until terminated.
- Each party shall have the right to terminate this agreement upon 45 days prior written notice to the other parties. Some obligations will continue to bind the parties even after the agreement is terminated. The obligations that continue after the agreement is terminated include:
  - The obligation to make reasonable efforts to maintain the privacy of client data.
  - The obligation to permit reasonable use of data that has already been entered into HMIS.
  - For HMIS Partner Agencies, the obligation to track and report the exits of all clients who were entered into HMIS by that HMIS Partner Agency before the contract was terminated, including, at a minimum, the name, date of exit, destination, income status, and benefits status of each exiting client.
  - All provisions of Section 6.0, "Limitation of Liability and Indemnification."
  - All provisions related to the protection of the HMIS vendor's intellectual property.
- The process governing amendments, including additions, deletions, or modifications to this agreement, is established by the San Luis Obispo County HMIS Policies and Procedures.

8.0 **Appointing an Agency HMIS Administrator**

Each HMIS Partner Agency is obligated to appoint at least one HMIS Administrator. The HMIS Administrator must sign this agreement. The duties of a HMIS Administrator are listed below:

- Overseeing agency compliance with the HMIS Participating Agency Agreement and all applicable plans, forms, standards, and governance documents.
- Ensuring all agency End Users complete the HMIS End User Agreement and maintaining necessary HMIS forms and documentation.
- Serving as the primary contact for all communication regarding the HMIS at this agency and forwarding information to all agency End Users as appropriate.
- Ensuring all agency End Users complete mandatory training and forwarding documentation of training to the HMIS Lead Agency.
- Providing first-level End User support, including technical support, for all End Users within a Partner Agency.
- Ensuring thorough and accurate data collection by agency End Users as specified by HMIS forms and standards.

- Completing agency-level HUD, State and other Federal reporting and/or supporting agency programs with reporting needs.
- Conducting appropriate audits of security, privacy, and data quality practices within the Partner Agency and assisting with corrective action as necessary.
- Safeguarding client privacy by ensuring End User and agency compliance with confidentiality and security policies.
- Continually monitoring and maintaining security of all staff workstations used for HMIS data entry.
- Preventing inadvertent release of confidential client-specific information through physical, electronic, or visual access to the workstation.
- Tracking the authorized users of HMIS within a Partner Agency.
- Tracking the computers and mobile devices that have been authorized by a Partner Agency to access HMIS.
- Ensuring the agency provides and maintains adequate internet connectivity.
- Detecting and responding to violations of any applicable HMIS plans, forms, standards, and governance documents.
- Reporting violations of any applicable HMIS plans, forms, standards, and governance documents, as well as associated disciplinary actions, to the HMIS Lead Agency.

Signatures

By signing, I am agreeing to fulfill all the responsibilities listed above for my role. Additional signature pages that are attached or included with this document are valid and binding.

Executive Director or CEO			
Name		Date	Signature

HMIS Administrator(s)			
Name	Title	Date	Signature

Department of Social Services Director			
Name	Title	Date	Signature

HMIS Lead			
Name	Title	Date	Signature

Return a signed copy of this form to:

HMIS Helpdesk
ss_hmissupport@co.slo.ca.us
Telephone: (805) 781-1897

San Luis Obispo County HMIS Privacy Notice

This Privacy Notice applies to all San Luis Obispo County HMIS-Participating Providers and addresses how information about you (client) shall be used and disclosed by Providers as well as rights over your information. This notice establishes minimum standards by which the Providers must follow. Providers may implement more stringent rules and procedures. This Notice may be amended at any time, and amendments may affect information obtained before the date of the amendment.

1. HMIS DATA COLLECTION & PURPOSE

A Homeless Management Information System (HMIS) is a local information technology system used to collect data on the housing and services provided to individuals and families experiencing homelessness and persons at risk of homelessness. This information is critical to better understand the extent and nature of homelessness at a local level, evaluate program effectiveness, and improve future housing and service provision. Providers may also be required by their funders to obtain certain additional information to determine eligibility, and to monitor outcomes.

This agency is an HMIS-participating homeless service provider ("HMIS Provider"). We collect information about the persons we serve in the shared County HMIS (HMIS) database. The agency shall only collect information deemed appropriate and necessary for program operation or information that is required by law or by the organizations that fund this program.

2. CONSENT

Through HMIS, we share your name, date of birth, age, gender, veteran status, and partial SSN ("Standard Information") with other HMIS Providers, unless you indicate that you do not want your Standard Information to be visible or tell an agency to mark your "Profile/Name" as private. You are still eligible for services if you refuse to have your standard information shared in HMIS.

Personal and Health Information: If you choose to sign the HMIS Consent for Release of Information (ROI), we will also share your enrollment information, which may include personal health information and information about your race, ethnicity, disabling conditions, previous residence history, employment history, substance abuse, sexual orientation, educational history and more. Your Standard Information and any information you release in your ROI is referred to as your Personally Identifiable Information (PII). This information will be visible in HMIS and may also be exchanged on paper, verbally or electronically based on uses and disclosures below.

Written consent to share your data in HMIS should be obtained at your first in-person meeting with the provider. Written consent may be obtained using the Electronic HMIS Consent for Release of Information, which indicates your consent to share your information.

Verbal consent to share your PII may only be obtained if the interaction meets the following criteria:

- The visit is not in person or not in a place conducive to paper or electronic signature.
- Agency staff reviews (or reads, if not in person) the Privacy Notice with ~~the~~ you (posted at intake desk, on clipboard, via electronic methods or comparable location). An electronic link to the privacy notice can be found here (link).
- You verbally agree to provide and share personal information.

San Luis Obispo County HMIS Privacy Notice- 1 of 4

- Agency staff complete the Verbal Consent record in HMIS, attesting to their compliance with the procedure above.

3.PERMITTED USES AND DISCLOSURES

HMIS is designed to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data, including Personally Identifying Information Once collected, we (as an HMIS Provider) have obligations about how these data may be used and disclosed (**uses** are internal activities for which providers interact with your PII; **disclosures** occur when providers share PII with an external entity). **We may use and disclose your PII only for the following purposes:**

To fulfill HUD Requirements:

(1) To allow you to access to your information; and

(2) Disclosures for oversight of compliance with HMIS privacy and security standards.

(3) To provide or coordinate services to an individual or household;

(4) For functions related to payment or reimbursement for services;

(5) To carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions;

(6) For creating de-identified reporting from PII;

Additional Uses and Disclosures: We may use or disclose your Personally Identifying Information for other reasons, even without your permission. Subject to applicable federal or state law, we are permitted to disclose your Personally Identifying Information without your permission for the following purposes:

(7) Uses and disclosures required by law;

(8) Uses and disclosures to avert a serious threat to health or safety;

(9) Uses and disclosures about survivors of abuse, neglect or domestic violence;

(10) Uses and disclosures for research purposes; and

(11) Uses and disclosures for law enforcement when a subpoena is provided.

HMIS Providers must also ensure that **any use or disclosure does not violate other applicable local, state, or federal laws**. Therefore, some HMIS Providers **may have more restrictive privacy policies**, often dependent upon funding source or the nature of a projects. Specific, per-project information regarding data use and disclosure can be obtained upon request. This can include agencies that must comply with the Health Insurance Portability and Accountability Act (HIPAA), Violence Against Women Act (VAWA). In these instances, the more restrictive policies take precedence.

4. UNDERSTANDING YOUR RIGHTS

HMIS recognizes every independent legal adult (person over 17 years of age) as the owner of all information about themselves, and any parent, legal guardian, or legal power of attorney as the designated owner of all information about any household members under their guardianship (all minors and any incapacitated/disabled adults).

By seeking assistance from this HMIS Provider and consenting to your personal information being shared within the HMIS, you transfer governance responsibility over your HMIS record to us, and we are responsible for handling your

record in accordance with HMIS privacy policies and any applicable federal, state, or local requirements. You retain ownership of your information within your HMIS record, and as owner **you have the following rights, in general:**

- Your refusal to share information will not be used to deny you services at this agency.
- You have a right to see your information, request to change it, and have a copy of your information from the servicing agency by written request.   You may also request assistance from this agency in documenting your history of homelessness to qualify for certain programs. An agency can refuse to change information but must provide you with a written explanation of the refusal within 60 days of the request[1]
- Any information you provide related to race, color, religion, sex, national origin, disability, familial status, and actual or perceived sexual orientation, gender identity, or marital status will not be used in any way that would discriminate against you or prevent you from receiving services or housing assistance. You have the right to file a complaint if you feel that you have been discriminated against.
- You may request a copy of this Privacy Notice and other agency policies that explain HMIS and your rights associated with how information is kept and shared through HMIS.
- You may request that a provider mark your personal data as private (not shared) within HMIS; and
- You may withdraw your consent to share at any time by writing to the staff identified in our Agency Privacy Notice. However, any information already shared with another agency cannot be taken back. Your request to discontinue sharing will have to be coordinated between sharing partners. You should tell each agency that you work with when you withdraw your consent.
- The confidentiality of your records is protected by law. This agency will never give information about you to anyone outside the agency without your specific written consent through this release or as required by law (The regulations are the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 (HIPPA), 45 CRF, Parts 160 & 164) and applicable California laws.
- **You should expect to provide additional, prior written consent for any use or disclosure of HMIS PII not included in the permitted uses and disclosures above.**

5. Requests and Grievance Policy

Agency Requests and Grievance

If you feel your privacy rights have been violated, or to request changes or copies of your records, please first submit a written request to the agency at which you are receiving services. Any privacy violations involving breaches of data will be reported to the HMIS Lead Agency. All other grievances must go through the grievance process at the agency at which you are receiving services. You cannot be retaliated against for filing a grievance. The grievance process may involve multiple steps for resolution. You may request to see the agency's full grievance process is agency:

INSERT AGENCY NAME and ADDRESS C/O

---

[1] We can deny a request to inspect or copy your PII for the following reasons: *(1) Provider Right to Deny Review: if information is compiled in reasonable anticipation of litigation or comparable proceedings; (2) if information about another individual other than the participating provider staff would be disclosed; (3) if information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the sources of the information; or (4) if the disclosure of information would be reasonably likely to endanger the physical safety of any individual; and we can reject repeated or harrasingharassing requests for access or correction.*

Formatted: Centered

Escalated Grievance Policy

An escalated grievance is to only be used after you have worked with the agency to resolve an HMIS issue and that resolution was not satisfactory. Thesatisfactory. The HMIS Grievance Form) or a similar written format can be used if you feel your privacy rights have been violated by an HMIS Participating Agency. An escalated grievance is to only be used after you have worked with the agency to resolve an HMIS issue and that resolution was not satisfactory.

You maywill submit this form to the HMIS Lead to the contacts below. This and will be reviewed by HMIS Lead Staff and routed to an internal review body.by the designated Homeless Services Oversight Council Committee to recommend resolution between you and the agency.

It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.

Grievances may be submitted in writing to:

County of San Luis Obispo Dept of Social Services
Attn: HMIS Lead
3433 S. Higuera St San Luis Obispo, CA 93401
Or
Via Email to: SS_HMISSupport@co.slo.ca.us

Formatted: Centered

Note Regarding Collection of Personal InformationHMIS Privacy Posted Notice

We collect personal information directly from you to:

- Best connect you with the services you need;

- Better understand the needs of homeless persons;

- Improve planning to address homelessness; and

- Improve services for homeless persons.

Additional uses and disclosures are available in a Privacy Notice. The only people who will be allowed to see your data are HMIS-trained staff for homeless service providers who have agreed to keep your data confidential. You have the right to refuse to share your data and this will not disqualify you from receiving services. for reasons that are discussed in our Privacy Notice. We may be required to collect some personal information as mandated by law or as requested from organizations that fund this program. Personal information we collect is necessary to operate programs, improve services and better understand the needs of homelessness at the local level. We collect appropriate information only. A Privacy Notice is available upon request.

Attachment 4.1.1.9