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

August 22, 2023, 9:00am

Committee members must participate in person (except for just cause 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 (those with just cause reasons approved by the HSOC staff) and the public may participate by Zoom video call:

https://us06web.zoom.us/j/87684495943?pwd=bDh4d3NWOEwvZE9MR25mK05DdGV1QT09

Or dial in:
+1 16694449171
Meeting ID: 876 8449 5943
Passcode: 717325

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. Discussion Item: Homeless Management Information System (HMIS)

            4.1.1.1. Discussion Item: HMIS Software Implementation Update

4.1.1.2. Discussion Item: HMIS System Administrators Monthly Call Report

4.1.1.3. Discussion Item: HUD (US Department of Housing and Urban Development) Data Standards Update

4.1.2. Discussion Item: HMIS Governance Documents

4.1.2.1. Action Item: Approve Updated Governance Documents

4.1.3. Discussion Item: PIT (Point in Time) Count Update

5. Future Discussion/Report Items

6. Next Regular Meeting: September 26, 2023, at 9am

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/Homeless-Services-Oversight-Council-(HSOC).aspx

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
FINANCE AND DATA COMMITTEE MEETING MINUTES

Date
July 25, 2023

Time
9:00-10:30 am

Location
Room 356, Dept of Social Services, 3433 S Higuera St., San Luis Obispo

Members Present
Carrie Collins
Christy Nichols
Janna Nichols
Lauryn Searles
Mark Lamore
Sstoz Tes

Members Absent
Brandy Graham
Jessica Thomas
Kate Swarthout
Mimi Rodriguez
Shay Stewart

Staff and Guests
Elaine Archer
Erica Jaramillo
Kari Howell
Kate Bourne
Kristin Ventresca
Laurel Weir
Merlie Livermore
Niko Elvambuena
Russ Francis
Skylar Caldwell
Staci Dewitt
Suzie Freeman

1. Call to Order and Introductions
Mark called the meeting to order at 9am. Introductions were made by those present at the meeting.

2. Public Comment

Carrie Collins shared that her team member Sonia is stepping down from her position at the Medically Fragile department.

3. Consent: Approval of Minutes

Approval of the minutes was tabled. Not enough members were present for a quorum.

4. Action/Information/Discussion

4.1 Implementing Five-Year Plan Line of Effort 2 - Focus Efforts to Reduce or Eliminate the Barriers to Housing Stability for Those Experiencing Homelessness or at Risk of Homelessness, Including Prevention, Diversion, Supportive Services, and Housing Navigation Efforts

4.1.1 Discussion Item: Changes to Public Benefits Programs

4.1.1.1 Discussion Item: Reinstatement of Annual Redetermination for Medi-Cal Eligibility

The invited DSS Participant Services representative was not available, so this topic was tabled for next meeting. Laurel mentioned that recertification and redetermination of Medi-Cal eligibility has started and there is concern regarding people losing benefits. She mentioned the importance of working together with DSS and other organizations to help people respond to the recertification process.

4.1.1.2 Discussion Item: Housing Choice Voucher Update

Elaine Archer shared that the vouchers are on hold for the rest of this year.

4.1.1.3 Discussion Item: Impact on Homeless Housing, Assistance and Prevention Program (HHAP) and Housing and Homelessness Incentive Program (HHIP) Outcomes

Laurel shared that the issue with Medi-Cal will have an impact on who can receive services from HHIP.

4.1.1.4 Discussion Item: Client Release of Information and Privacy Posted Notice

Kate shared how Client release of Information functions now. There was a discussion on how much information is being viewed by workers. If there's a release in client record, not all data in client's record is seen by others. It was suggested that such release needs to be documented through an approved release form.

4.2. 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

4.2.1 Discussion Item: Homeless Management Information System (HMIS)

4.2.1.1 Discussion Item: HMIS Vendor Selection Process Update

Kristin Ventresca shared that the County has signed contracts with a vendor and will go to the Board of Supervisors in August to get approval.

4.2.1.2 Discussion Item: Update on Implementation of AB (Assembly Bill) 977

Kari Howell shared that the AB977 compliance resulted in 9 new projects in HMIS, updating funding sources for more than 10 projects and the onboarding of one new service provider, for a total of 12 participating agencies. This effort resulted in having a more comprehensive understanding of the effects of the State funded homelessness programs.

4.2.1.3 Discussion Item: HMIS System Administrators Monthly Call Report

Kari shared that on July 12, the data team attended a one-day virtual conference with NHSDC (National Human Services Data Consortium). This conference highlighted a presentation from two organizations who overhauled their HMIS. For the monthly call, Kari mentioned that most of the admin calls right now are specific to the data standards update, changes in race and ethnicity, and rapid rehousing with services or only services. She also shared that HUD has confirmed they are holding off on the data standards for Coordinated Entry for now.

4.2.1.4 Discussion Item: Data Quality

Kate Bourne reported that data quality reports for June had not gone out yet due to a temporary pause because of some data quality report issues. The June report will be coming out later this week. Data quality will also be talked about during the upcoming site visits. Lauren Searles suggested having a training on how to read, interpret reports and resolve data errors.

Sstoz Tes pointed out that there is an unresolved tension the intake process that he doesn't think is resolvable. The tension lies between the progressive intake concept versus getting everything perfect. The outreach staff are getting minimal information from participants. He shared that the errors in reports from outreach efforts will never be resolved since people move on and never seen again. Kate shared that the team would follow up on identifying street outreach issues.

4.2.1.5 Discussion Item: HUD (US Department of Housing and Urban Development) Data Standards Update

In preparation for HUD data standards changes going live on October 1, a staff user online training will be held on September 12. In addition, Kate mentioned that there will be a training on August 23 for system administrators to get an overview on what needs to be reviewed with staff in more detail. She also shared that the team will be doing additional outreach regarding reclassification of the rapid rehousing projects since these are being split up into two types: rapid rehousing with services and rapid rehousing only. Also, feedback will be needed on what languages should be included in the "language assistance needed" field. HUD allows for up to 20 languages in this category. Kate also clarified that this is not a language translation ability within Bell data, rather a dropdown to say if staff was provided a translation in particular language to the client.

4.2.2 Discussion Item: Homeless Housing, Assistance and Prevention Program Round 3 (HHAP 3) Outcome Data

Laurel shared about outcome data measurements.

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

4.3.1 Action Item: Vote to Recommend the HSOC Approve the Universal Grant Application Threshold Review and Scoring Rubric, to be Used by ad hoc Grant Review Committees as the Basis for Scoring All Grants for Which the HSOC Makes Funding Recommendations

From the last meeting, the Committee requested clarification in the Data Management and Experience category, specific to "Project applicant's data quality is at or above 90%" before recommending to HSOC for approval. Russ provided a quick update on the piece that was modified from the last meeting.

Janna also presented questions regarding the relevance of an applicant's experience in meeting prior grant matrix; sufficient funding for continued operation; scoring for other projects; representation of applicants from under-represented individuals such as BIPOC, LGBTQ, etc.

Janna and Mark also brought up the weight distribution given to each category. Laurel would like feedback from the committee. Mark suggested to have some time to look at the rubric again and come back for recommendation.

5. Future Discussion/Report Items
- Coordinated Entry/HMIS
- Data Standards update
- Written ROI policy and procedure
- Governance documents as action item-new privacy notice, amended to not need written consent

6. Next Regular Meeting
August 22, 2023, at 9am

7. Adjournment
Mark adjourned the meeting at 11:03 am.

San Luis Obispo County HMIS Policies & Procedures

Continuum of Care:

CA-614 San Luis Obispo County

HMIS Lead Agency:

County of San Luis Obispo
Department of Social Services
Homeless Services Division
PO Box 8119
San Luis Obispo, CA 93403
Telephone: (805) 781-1600

Contents

1. Revision History

These Policies and Procedures shall be reviewed and, if necessary, revised at least annually by the Continuum of Care. See Section 6.10 for Policies and Procedures related to changes of this and other documents.

Date	Author	Description
11/27/2012	County of San Luis Obispo Department of Planning and Building	Full revision referencing all HUD standards and 2011 HEARTH HMIS Proposed Rule
1/6/2014	County of San Luis Obispo Department of Planning and Building	Revisions referencing designations
10/27/2016	County of San Luis Obispo Department of Planning and Building	General revisions
7/21/2021	County of San Luis Obispo Department of Social Services	General revisions and updates
08/22/2023	County of San Luis Obispo Department of Social Services	Formatting update and revisions to reflect the FY 2024 HUD Data Standards

2. Introduction

The Homeless Management Information System (HMIS) is a longitudinal database to assist in the service of homeless populations throughout the United States. It is designated by a local Continuum of Care (CoC) to comply with the requirements of the CoC Program Interim Rule 24 CFR 578. The San Luis Obispo Continuum of Care (CoC) has implemented this system since 2010. It has undergone several instances of change since the initial implementation. With this version of Policies and Procedures the Homeless Services Division within the Department of Social Services hopes to see further expansion of participating agencies and streamlined delivery of homeless services. The Homeless Services Division is undergoing a multi-year effort to grow and improve the system.

HMIS Data and Technical Standards Final Notice, published by HUD in July 2004, and revised in March 2010. As described in the March 2010 HMIS Data Standards Revised Notice, an HMIS is an electronic data collection system that stores longitudinal 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 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
- 2010 HMIS Data Standards Revised Notice
- 2011 HMIS Requirements Proposed Rule

HMIS is used by the federal partners and their respective programs in the effort to end Homelessness, which includes:
- US Department of Health and Human Services (HHS)
- US Department of Housing and Urban Development (HUD)
- US Department of Veterans Affairs (VA)
- Housing Opportunities for Persons with HIV/AIDS (HOPWA)

Partners with funding from the State of California may be required to participate in HMIS under Title 42. Programs with other sources of funding are not required to participate in the HMIS, but they are strongly encouraged to participate to contribute to a more comprehensive understanding of homelessness in the region.

Comparable databases are required for use by providers of services for survivors of domestic violence, as described in the Violence Against Women Act (VAWA). It is the San Luis Obispo County CoC HMIS Lead's responsibility to ensure the compliance of comparable databases. Other federal and state partners also require HMIS participation for grantees and subrecipients.

The HMIS and its operating policies and procedures are structured to comply with the most recently released HMIS Data Standards. Recognizing that other Federal, State, and local laws may further regulate agencies, the San Luis Obispo County CoC may negotiate its procedures and/or execute appropriate business agreements with Partner Agencies so they are in compliance with applicable

laws.

3. Governing Principles

Described below are the overall governing principles upon which all decisions pertaining to HMIS are based. Participants are expected to read, understand, and adhere to the spirit of these principles.

3.1 Confidentiality

Policies regarding client data are founded on the premise that a client owns his/her personal information. Everyone will have the right to grant informed consent, limit data sharing, or revoke consent related to his/her PPI at any time. Policies are in place to protect client, agency, and the SLO County CoC's interests. Collection, access and disclosure of client data through HMIS will only be permitted by the procedures set forth in this document.

The protection of clients' rights and privileges is crucial to the successful operation of HMIS. These policies and procedures are intended to ensure clients' privacy without impacting the delivery of services. Security and confidentiality will be prioritized by System Administrators and End Users at all times.

3.2 Data Quality

All End Users will strive for the highest possible degree of data quality. Complete and accurate data recording will help improve service coordination and data-driven decision making.

3.3 System Availability

The availability of a centralized data repository is necessary to achieve an aggregation of unduplicated homelessness statistics. The San Luis Obispo County CoC will strive for broad deployment and availability of the HMIS by human service agencies that adopt the aforementioned governing principles.

4. Roles and Responsibilities

Homeless Services Oversight Council

The Continuum of Care, through its Governing Board the Homeless Services Oversight Council (HSOC) is responsible for the governance of the San Luis Obispo HMIS. In all HMIS governance decisions, the Continuum of Care will balance the interests and needs of all HMIS stakeholders, including clients, service providers, and policy makers. Through this role it will provide the following:

- Oversight to the HMIS Lead
- Approval of HMIS policy forms and documentation
- Ensure Agency participation and feedback
- Approve and facilitate HMIS Funding
- Compliance with HMIS Policies & Procedures

HMIS Lead Agency

The San Luis Obispo Homeless Services Division (HSD) will serve as the HMIS Lead Agency, known informally and interchangeably as HMIS Lead or HMIS Lead Agency. The HMIS Lead Agency provides day-to-day management of system participation, operations, and security. Through this role, HSD staff will be the primary contact for both HUD and the HMIS vendor. HSD staff will bring in additional subcontractors to fulfill these tasks as necessary. In addition, they will be responsible for the following:

- Negotiate software vendor contracts
- Evaluate potential Partner Agencies for HMIS Participation
- Ensure Compliance with HMIS Policies & Procedures
- Authorized agent for Agency Participation Agreements
- Creation of Project forms and documents
- Maintain up to date information on the HMIS website
- Monitoring end user licenses
- Point of contact with software vendor
- Add & Remove user rights
- Manage concurrent licenses
- Develop and administer training curriculum
- Ensure documentation of training
- Provide confidentiality training
- Provide initial software training for Agency Administrators and end users
- Provide end user support
- Review security of Participating Agencies via site visits
- Monitor data quality and timeliness
- Assure vendor adherence to HMIS Data and technical Standards

- Application Customization
- Aggregate data reporting and extraction per agency needs
- Assist Partner Agencies with agency-specific data collection and reporting needs
- Manage User licenses

HMIS Partner Agency

- An HMIS Partner Agency is an entity that has agreed to uphold these Policies and Procedures by executing an HMIS Participating Agency Agreement with the County of San Luis Obispo. Representatives from HMIS Partner Agency are referred to as 'Agency Administrators' and are responsible for the actions of the HMIS End Users within their agency workgroups. Serve as Authorizing Agent for Partner Agency
- Enroll HMIS users in New User training
- Notify HMIS Lead Agency of departure of any HMIS user, before or on the date of their departure in order to maintain site security and client confidentiality
- Designate individual for Agency Technical support
- Monitor Agency compliance with Policies & Procedures
- Hold executed Client Informed Consent forms
- Serve as Authorizing Agent for user ID requests
- Ensure compliance with HMIS Policies & Procedures
- Ensure data quality and timeliness
- Ensure data is corrected on monthly data quality reports or per request of HMIS Lead
- Attend monthly HSOC Finance and Data Committee meetings
- Monitor security of staff workstations
- Maintain their agency's internet connectivity
- Ensure virus protection and spyware detecting software is installed on all computers that access HMIS and ensure a virus scan is run at least once a week
- Run data integrity reports, run down discrepancies and make corrections

HMIS End User

All HMIS End Users are required to read and comply with the most recent HMIS Data Standards Manual. Failure to comply with the HUD standards warrants the same consequences as failure to comply with SLO CoC HMIS Policies and Procedures. In any instance where these Policies and Procedures are not consistent with the HUD Standards, the HUD Standards take precedence. Should any inconsistencies be identified, the end user and Partner Agency are expected to immediately notify the HMIS Lead Agency.

- Sign HMIS User Agreement
- Attend and participate in HMIS training provided by the County of San Luis Obispo
- Safeguard client privacy through compliance with confidentiality policies
- Collect data as specified in end user training and as directed in compliance with the HMIS Policies and Procedures
- Enter data within 3 business days of program entry or exit
- Adhere to the HMIS Policies & Procedures

5. Operating Procedures

5.1 Agency Participation

Agencies participating in HMIS shall commit to abide by the governing principles of HMIS and adhere to the terms and conditions of this partnership as detailed in the HMIS Participating Agency Agreement.

Participating agencies must have a signed HMIS Participating Agency Agreement prior to project set up, entry of client data or requesting HMIS end users. This document allows agencies to specify if they would like their client data shared with other agencies in the database. Data sharing is encouraged, with appropriate client consent, to help facilitate referral of services between agencies. This will also help reduce the number of duplicate entries. New Agencies interested in participating in HMIS must enter into an HMIS Participating Agency Agreement, which the HMIS Lead Agency reserves the right to approve, deny, or seek additional information thereof. Upon receipt of completed and subsequently approved Agency Agreement, HSD staff will begin the New Project Set-Up and New User processes detailed below. Once a new agency is granted access to HMIS by the HMIS Lead, the new agency will be added to the list of participating agencies posted to the HMIS website.

Assign Participating Agency HMIS Administrator

Each Partner Agency shall designate a primary contact for communications regarding HMIS. This individual will receive regular updates regarding any changes in HMIS and monthly Data Quality reports. They will be expected to respond to any direct inquiries on data quality issues and assist in overall compliance and training new users at their agency. For Partner Agencies that do not designate an HMI Agency Administrator, the HSD reserved the right to assign one

Minimum Participation Standards

HMIS partner agencies and users must collect all of the universal data elements, as defined by HUD, for all clients receiving services in programs participating in the San Luis Obispo County HMIS. Additionally, all participating agencies are responsible for ensuring that Common Program Specific Data Elements, as defined by the HMIS Data Standards, are collected from all clients that are served by applicable HUD funded programs. Other optional data elements may also be required for certain programs, as decided by the Homeless Services Oversight Council (HSOC) in partnership with the Coordinated Entry Case Managers.

5.2 New Project Set-Up

Participating agencies in HMIS are expected to submit a New Project Request Form for all new projects within the HUD recommended timeframe of 90 days prior to serving clients or spending funds specific to HMIS compliance. Agencies must be in compliance with, and have a current Agency Agreement with HSD to submit new projects. The New Project Form can be retrieved online on the Homeless Services Division website or by emailing the HMIS Support inbox at: ss_hmissupport@co.slo.ca.us, or an otherwise determined support ticket process. It is the responsibility of the HMIS participating agency to ensure projects are set up correctly and timely. Projects entered into HMIS, unless specifically determined otherwise, are subject to the San Luis Obispo CoC HMIS Data Quality Plan.

HMIS Agency Administrators are responsible for informing HSD staff when a project is no longer serving clients. The HMIS Lead will deactivate the project in HMIS so no new enrollments can be added to the project. Data from deactivated projects will remain available in HMIS for 7 years per HUD requirements.

Agency Administrators interested in requesting changes to current projects in HMIS must reach out directly to the HMIS Lead by emailing the HMIS Support inbox at: ss_hmissupport@co.slo.ca.us, or an otherwise determined support ticket process.

5.3 New User Enrollment

An Access Request form is required for each licensed user. Any agency that is a provider of homeless services to clients in and around San Luis Obispo County is encouraged to participate in contributing data to HMIS. Participation may be required depending on funding source. The HMIS Lead will determine if there are available user licenses.

The Partner Agency Administrator are expected to submit a HMIS User Account Request Form to the HMIS Lead to set-up the user's access in HMIS. It is the responsibility of the Agency Administrators and individual user to ensure timely and accurate completion of HMIS End User Training as outlined in the New User Request Form.

HMIS Partner Agencies must notify HMIS Lead and HSD staff of relevant personnel changes. Additional details regarding change of user status can be found in the section for Deactivating Accounts. When an HMIS user no longer needs access to HMIS, whether due to changing job responsibilities or departure from the agency, Agency Administrators are to notify HSD within a reasonable timeframe. In the event that HMIS account access Is not revoked for any reason, the former HMIS user is required to act with integrity and not attempt to access HMIS if their job duties no longer include HMIS or if they leave their HMIS participating agency.

User access is agency and project specific and at the discretion of the HMIS Lead Agency. User access level will be determined based on the New User Request Form submitted by the Agency Administrator and approved by HSD staff.

User IDs are individual, and passwords are confidential. No individual should ever use or allow use of a User ID that is not assigned to that individual, and user-specified passwords should never be shared or communicated in any format.

5.4 Security

Assessment

Prior to allowing access to the HMIS, the Partner Agency's Administrator(s) will meet with HSD staff to review and assess the security measures in place. They will assess agency information security protocols. This review shall in no way reduce the responsibility for agency information security, which is the full and complete responsibility of the Partner Agency and its staff.

Annual Security Audit

Depending on available resources at the County level, an annual security audit will be held to confirm security at participating HMIS Partner Agencies.

Workstation Security

Each HMIS user is required to utilize the following at their workstation:

- Anti-spyware software and virus protection properly installed
- A full-system scan has been performed within the last week
- Each workstation has and uses a hardware or software firewall
- Screens that "go to sleep" after 5 minutes of inactivity and require a password to re-activate
- Screens positioned or equipped so that data is not visible to others
- Does not have usernames and/or passwords posted in visible locations

Prior to access, Partner Agencies will confirm that any workstation accessing HMIS has and uses a hardware or software firewall and that anti-virus software performs frequent full-system scans.

Unencrypted PPI may not be stored or transmitted in any fashion—including sending file attachments by email or downloading reports including PPI to a flash drive, to the End User's desktop or to an agency shared drive. All downloaded files containing PPI must be deleted from the workstation temporary files and the "Recycle Bin" emptied before the End User leaves the workstation.

Access Rights

Access to the HMIS will only be approved for those staff members that require access for business purposes only. The user's access rights will be determined by the Partner Agency Administrator and the HMIS Lead.

If a user changes roles within a Partner Agency or needs to access new Projects within HMIS, the Partner Agency Administrator should contact HSD staff to modify those permissions. It is important that the Partner Agency Administrator notifies the HMIS Lead of these changes as soon as possible so that rights can be added and removed as appropriate. Further details for Agency Administrators regarding removing access, personnel changes, and consequences for data breach found in the Deactivating Accounts section.

Password and User ID Assignment

Upon completion of training and signing the User Agreement, the user will be assigned a unique ID and password to access the rights assigned that user within the HMIS. Users should not allow anyone else use of their assigned unique user ID. A user should never use an ID that is not assigned to them nor should passwords be shared and or communicated in any format. To do so is considered a breach of security and users may have their HMIS access revoked at the discretion of the HMIS Lead.

Changing Passwords

When the user logs onto the system for the first time they will be prompted to change their password to a password only they know. Passwords must consist of at least 8 characters, a combination of at least one upper case letter, at least one lower case letter, and at least one special character.

Passwords must be changed every 90 days. If they are not changed within that time period, they will expire and the user will be locked out of the system. Three consecutive unsuccessful attempts to login will disable the User ID until the HMIS Lead or Partner Agency Administrator reactivates the

account.

In the event a user's password has expired, or the user forgets their password, users may use the "Forgot Password" feature on the website to reset their password. If a user still cannot access the site, they should contact HSD staff at ss_hmissupport@co.slo.ca.us for assistance.

Deactivating Accounts

It is important that a user account be deactivated in the system when they leave the agency or otherwise becomes inactive. It is a breach of security to have unused user accounts active. It is the responsibility of the Partner Agency Administrator to notify the HMIS Lead within two (2) business days if a staff member leaves the Agency. In the event that HMIS account access Is not revoked for any reason, the former HMIS user is required to act with integrity and not attempt to access HMIS if their job duties no longer include HMIS or if they leave their HMIS participating agency.

Access may be immediately rescinded when any HMIS user is suspected of breaching the Partner Agency User Agreement, violating the Policies & Procedures, or breaching confidentiality or security, while an investigation by the HMIS Lead and the Partner Agency is conducted. If the user is found to have breached or violated the above, and the Partner Agency does not otherwise permanently inactivate the user from the system (termination of employment, reassignment of duties) the HMIS Lead has the right to permanently inactivate the account thereby denying access to the system for that user.

Data Breach

A data breach is the unauthorized access or acquisition of data that compromises the security, confidentiality, or integrity of data in HMIS. Data may be in any format (electronic, hardcopy or verbal) and may consist of a single piece of data and/or an entire data system. Breaches to the HMIS servers are managed by the HMIS vendor. If a breach to the HMIS servers occurs, the HMIS vendor will notify the HMIS Lead, and the CoC. Should a data breach occur through a Partner Agency, the Partner Agency is required to notify the HMIS Lead immediately. The HMIS Lead and CoC reserve the right to revoke access to HMIS to any individual or Partner Agency because of a data breach.

5.5 Collection and Entry of Client Data

Each participating agency is responsible for their clients' data. Participating agencies must obtain informed consent prior to entering or accessing any client protected personal information (PPI) in the San Luis Obispo HMIS. These policies and procedures are intended to provide the minimum level of consent and accompanying documentation. Participating agencies may develop more stringent policies to fit their organizational needs.

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements (as specified in those requirements) and these Policies and Procedures. Agencies and programs are responsible for ensuring HIPAA compliance.

Victim service providers and legal service providers that are recipients of funds requiring participation in HMIS, but do not directly enter data into an HMIS, must use a comparable database. A comparable database allows the collection of the aggregate data needed for reporting while respecting the sensitive nature of the client-level information if it complies with all HMIS data,

technical, and security standards.

HMIS-participating Agencies will be given data entry access, but this does not necessarily include data sharing with other agencies. Law enforcement agencies and legal service providers receiving funding that requires HMIS participation will be given data entry access only.

The HMIS Lead Agency reserves the right to remove HMIS Access if the access is not being used to improve service provision for clients or contributing meaningful data to the CoC. Examples of unacceptable uses of HMIS include but are not limited to:

        a. Using HMIS data to monitor the whereabouts or service utilization of participants for purposes outside of housing-focused case management

        b. Using HMIS data outside of a business need

        c. Using data in HMIS as a reason to not serve a client that is not related to eligibility criteria (i.e. substance use history, mental health issues, etc.)

        d. Sharing client identifying data with persons or groups that don't have access HMIS

Client Informed Consent and Confidentiality

Client Data will only be shared with Partner Agencies if the Client consents, has signed the Release of Information Authorization, and the signed Informed Consent & Release of Information Authorization is available on record. All Universal and Common Program Specific Data Elements from the current HMIS Data Standards should be collected, subject to client consent.

Additional data may also be collected to support other programs.

Client Entry and Exit Data

Client program entry and exit dates should be recorded for all program participants. Entry dates should record the first day of services or program entry with a new program entry date for each period/episode of services. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter/housing or the last day a service was provided in a program.

Data Timeliness

Per the San Luis Obispo County CoC HMIS Data Quality Plan, HMIS data must be entered into HMIS in real time or within three (3) business days from the point of the event (intake/enrollment, service delivery, annual assessments, or exit/discharge).

Data Quality Plan

A Data Quality plan is a systematic approach for the CoC to establish and define data quality expectations. Data quality is a key component for HUD reporting purposes such as the System Performance Measures (SPM), Longitudinal Systems Analysis Report (LSA), Annual Performance Report (APR), Point-In-Time (PIT) Count and Housing Inventory Count (HIC), as well as reporting purposes for federal and state partners. In addition, HUD ties data quality to overall CoC competitiveness for funding.

In order to qualify as "participating in the HMIS," all HMIS Participating Agencies must meet the data quality benchmarks as described in the San Luis Obispo County CoC HMIS Data Quality Plan. These benchmarks apply to all HMIS Participating Agencies, whether or not the agency provides the data directly into the HMIS or submits it to the HMIS Lead Agency for input into HMIS, including the following mandated projects: HUD Continuum of Care (HUD CoC) & Emergency Solutions Grant

(ESG), US Department of Veterans Affairs Supportive Services for Veterans Families (VA SSVF), and US Department of Health and Human Services Runaway and Homeless Youth (HHS RHY) Substance Abuse and Mental Health Services Administration Projects for Assistance in Transition from Homelessness (SAMHSA PATH).

Data Quality Monitoring

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.

5.6 Release and Disclosure of Client Data

Client-specific data from HMIS may be shared with Partner Agencies only when the sharing agency has secured informed consent authorizing such sharing, as demonstrated by a signed HMIS Release of Information Authorization form, and only during such time that Client Informed Consent and Release of Information Authorization is valid (before its expiration). Other non-HMIS inter-agency agreements do not cover the sharing of HMIS data. Sharing of client data may be limited by program specific confidentiality rules.

The HMIS Release of Information Authorization (ROI) must constitute informed consent. The burden rests with the Partner Agency End User or intake counselor to inform the client about the purpose and function of HMIS data before asking for consent. As part of informed consent, a Privacy Posted Notice must be posted in the intake area explaining the reasons for collecting the data, the client's rights regarding data collection, and any potential future uses of the data. An example of such a sign may be found in the HMIS website.

Partner Agency End Users must obtain a new signed ROI and enter it into HMIS if the client's original release has expired.

No client-specific data will be released or shared outside of the Partner Agencies unless the client gives specific written permission or unless withholding that information would be illegal. Note that services may NOT be denied if client refuses to sign Release of Information Authorization or declines to state any information. Regulation specific to law enforcement and legal data sharing is provided in the section for Collection and Entry of Client Data.

Aggregate data that does not contain any client-specific identifying data may be shared with internal and external agents without specific permission. This policy should be made clear to clients.

HMIS Privacy Posted Notice

HUD's HMIS Privacy and Security Standards specify the guidelines for the privacy and security of

personal information collected and stored in an HMIS. The standards require each covered HMIS Participating Agency to publish a HMIS Privacy Posted Notice. The standards establish baseline privacy requirements for the HMIS Participating Agencies. A HMIS Participating Agency must post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting this information. Consent of the individual for data collection may be inferred from the circumstances of the collection.

HMIS Privacy Notice

The HMIS Privacy Notice applies to all San Luis Obispo County CoC HMIS Participating Providers and addresses how information about clients may be used and disclosed at Providers as well as client rights over their information. The HMIS Privacy Notice may be amended at any time, and amendments may affect information obtained before the date of the amendment. The agency will provide copies of the privacy notice to any client upon request.The agency should also include a copy of the HMIS Privacy Notice on their organization website.

Clients' Rights to Data

A client shall have the right to receive a copy of HMIS data relating to their individual profile upon request.

Grievance Policy

Per the SLO County HMIS Privacy Notice, the client has the right to ask questions of, or submit grievances to, the provider regarding privacy and security policies and procedures.

The HMIS Grievance Form will be used for clients who feel their privacy rights have been violated by an HMIS Participating Agency. The form is to only be used after the client has worked with the agency to resolve an HMIS issue.
The client will submit the form to the HMIS Lead and will be reviewed by the HSOC Finance and Data Committee to recommend resolution between client and agency.

5.7 Training

HMIS Orientation

All users accessing HMIS must first complete the San Luis Obispo CoC HMIS training. Training materials and videos are stored on the SLO County-Homeless Services SharePoint site. The CoC and HMIS Lead Agency reserve the right to improve and innovate training procedures so long as reasonable and ample notice is provided for HMIS Partner Agencies and end users. Users will receive a link to access this site once they have been enrolled by and Agency Administrator as described in the New User Enrollment section of this document. All users will review the content on the SharePoint site and pass the accompanying quiz before they are given access to the system. Training for privacy and security measures will occur annually, and all participating agencies and users must participate. Additionally, users must attest to their knowledge and application of the privacy and security measures.

Live Training

The Partner Agency Administrator will coordinate with the HMIS Lead to schedule any additional live trainings with the HMIS vendor and/or HSD Staff. Live, virtual training will also be coordinated for any HUD Data Standard updates or other system changes. All users will be expected to attend these trainings or view a recording if one is made available.

5.8 Technical Support

Technical support includes issue reporting, requests for enhancements (features), or other HMIS-related requests. The HMIS Lead will only provide support for issues specific to the HMIS software and systems, not for technical support of hardware being used by HMIS users.

Request for Support

End Users should submit support requests to their Partner Agency HMIS Administrator, who may escalate the request to the HMIS Lead Agency, who may in turn escalate the request to the HMIS software vendor as appropriate. Under no circumstances should End Users submit support requests directly to the HMIS software vendor.

The user should evaluate the immediacy of the issue. If the user needs immediate resolution of the issue because the issue is hindering the user from being able to enter the data into the system, the user should contact the HMIS Lead at ss_hmissupport@co.slo.ca.us. When submitting a request to the HMIS Support inbox, only one issue should be contained per email. This will allow Support staff to more efficiently assign or escalate items.

Most common emergent issues are a forgotten password, a password that is not working, or the user is trying to access the system from a computer that an individual has not accessed the system from before. Forgotten passwords can be resolved using the "Forgot Password" button on the software landing screen.

6. Changes to The Policies and Procedures and Other Governance Documents

Revisions

The HMIS Lead will seek approval for revisions of all HMIS documents in consultation with the HSOC Finance and Data Committee.

Distribution

A copy of the revised Policies and Procedures document will be distributed to the partner agencies. Partner Agencies will be asked to sign a receipt acknowledging they have received the revised Policies and Procedures. It is the agency's responsibility to make sure everyone participating in the HMIS has access to a copy of the document, reads it, understands it, and agrees to comply with it. If anyone participating in the HMIS has issue with any revision, they may contact the HMIS Lead and voice their concern. They must, however, comply with the revisions or stop using the system until the issue is resolved.

7. Other Obligations and Agreements

The San Luis Obispo County CoC will decide funding responsibilities for additional licenses as the needs arise. While it may not be possible to meet every Partner Agency's request for End User licenses with the existing funding, the HMIS Lead Agency, in partnership with the Continuum of Care,

will endeavor to ensure that every Partner Agency will have its minimum requirements met.

8.Glossary of Terms

Bell Data: The HMIS vendor that is currently used by San Luis Obispo County.

Client: Any persons who is, has been, or will be entered into HMIS.

CES: Coordinated Entry System

CoC: Continuum of Care

End User: Any person given access to the database for entering or updating HMIS data.

HIPAA: Health Insurance Portability and Accountability Act

HMIS: Homeless Management Information System

HMIS Data Standards: HUD HMIS Data Standards Manual containing specification on type of data elements required. San Luis Obispo CoC will always use the most recent Data Standards Manual posted to the HUD Exchange.

HSD: Homeless Services Division

HSOC: Homeless Services Oversight Council

HUD: U.S. Department of Housing and Urban Developmet

HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)
Finance & Data Committee
ACTION ITEM
August 22, 2023

AGENDA ITEM NUMBER: 4.1.2.1

ITEM: Approve the 2023 revisions to the San Luis Obispo County CoC HMIS Policies and Procedures to reflect the 2024 HUD Data Standards

ACTION REQUIRED: Vote to approve the 2023 revisions to the San Luis Obispo County CoC HMIS Policies and Procedures to reflect the 2024 HUD Data Standards

SUMMARY NARRATIVE:
A Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Each Continuum of Care (CoC) is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards. The HSOC designated the County of San Luis Obispo as the lead agency for HMIS per 24 CFR 578.7, and employs the System Administrator.

The Responsibilities of the CoC, per 24 CFR 578.7, also states that the CoC, in consultation with the collaborative applicant and the HMIS Lead, must develop, follow, and update annually a governance charter, which will include all procedures and policies needed to comply with subpart B, and with HMIS requirements as prescribed by HUD.

In 2020, HMIS staff, based on recommendations from HUD Technical Assistance, updated the HMIS Participating Agency Agreement, HMIS Privacy Policy, HMIS Privacy Posted Notice and the HMIS Grievance Form, in consultation with the HSOC Finance and Data Committee and with approval from the full HSOC.

On July 7th, 2021, the HSOC Finance & Data Committee voted to approve the 2021 revisions to the HMIS Policies and Procedures and the HSOC Committee voted to approve the 2021 revisions to the HMIS Policies and Procedures on July 21, 2021. The 2023 revisions to the San Luis Obispo County CoC HMIS Policies and Procedures reflect the most recent guidance and publishing of the 2024 HUD Data Standards.

BUDGET/FINANCIAL IMPACT:
There are no financial impact to the HSOC if the HSOC votes to approve the updates. Failing to update the standards could cause the CoC to be considered out of compliance with HUD requirements for the CoC program.

STAFF COMMENTS:

Staff recommends that this item be adopted to be in compliance with 24 CFR 578.7.