# TABLE OF CONTENTS

Key Terms and Acronyms .................................................................................................................................................. 3

I. POLICIES AND PROCEDURES SUMMARY .................................................................................................................. 9
   A. Policy Disclaimers and Updates .......................................................................................................................... 9

II. AGREEMENTS, CERTIFICATIONS, LICENSES AND DISCLAIMERS ............................................................................. 10
   A. HMIS Governance Charter .................................................................................................................................. 10
   B. Project Participation: Required Agreements, Official Documents, and Policies .................................................. 10
   C. User Licenses and Roles in HMIS ....................................................................................................................... 11
   D. Administrative Access .......................................................................................................................................... 12

III. PRIVACY ............................................................................................................................................................ 14
   A. Privacy and Security Plan .................................................................................................................................. 14

IV. DATA BACKUP AND DISASTER RECOVERY PLAN ................................................................................................ 20
   A. Backup Details for the HMIS ............................................................................................................................. 20
   B. HMIS Project Disaster Recovery Plan ............................................................................................................... 20

V. SYSTEM ADMINISTRATION .................................................................................................................................... 21
   A. Meetings in Which NCCEH System Administrators Regularly Participate ...................................................... 21
   B. NCCEH System Administrator Responsibilities ............................................................................................... 21

VI. DATA QUALITY PLAN AND WORKFLOWS .......................................................................................................... 24
   A. Provider Page Set Up ......................................................................................................................................... 24
   B. Data Quality Plan ............................................................................................................................................... 24
   C. Workflow Requirements ....................................................................................................................................... 26

VII. RESEARCH AND ELECTRONIC DATA EXCHANGES .......................................................................................... 27
   A. Electronic Data Exchanges .................................................................................................................................. 27

APPENDIX A: HMIS Structure ........................................................................................................................................ 28
Revision History

The HMIS Advisory Board will review these Operating Policies and Procedures on an annual basis and will approve updates as needed. Suggested changes may be brought to the Advisory Board at any time via hmis@ncceh.org.

<table>
<thead>
<tr>
<th>Revision Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>June 2019</td>
<td>First Release</td>
</tr>
</tbody>
</table>
The purpose of an HMIS project is to:

- Record and store client-level information about the numbers, characteristics, and needs of persons who use homeless housing and supportive services
- Produce an unduplicated count of persons experiencing homelessness for each Continuum of Care
- Understand the extent and nature of homelessness locally, regionally, and nationally
- Understand patterns of service usage and measure the effectiveness of projects and systems of care
- Provide platform that allows for Continuums of Care and projects to comply with HUD Data Standards and other funding requirements.

These are the standards of operation for the HMIS@NCCEH. The following operating policies and procedures apply to the HMIS Lead Agency and Participating Agencies.

**KEY TERMS AND ACRONYMS**

<table>
<thead>
<tr>
<th>Term</th>
<th>Acronym or another name (if used)</th>
<th>Brief Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>42 CFR Part 2</td>
<td>Part 2</td>
<td>42 CFR Part 2 is the federal regulation governing the confidentiality of drug and alcohol use treatment and prevention records. The regulations are applicable to certain federally assisted substance use treatment programs. This law limits use and disclosure of substance use patient records and identifying information.</td>
</tr>
<tr>
<td>Administrative Use Agreement</td>
<td></td>
<td>The agreement that governs access to data for administrative use for CoC Collaborative Applicants, other funders, and contractors.</td>
</tr>
<tr>
<td>Advisory Board</td>
<td></td>
<td>Governance structure for HMIS@NCCEH. Representation by each CoC is maintained in the governance of HMIS. More information available on the NCCEH website.</td>
</tr>
<tr>
<td>Agency Administrator</td>
<td>AA</td>
<td>All Participating Agencies are required to have at least one Agency Administrator. Agency Administrators serve as the point of contact, provide support to Users, maintain documentation, and are responsible for privacy and security, and data quality.</td>
</tr>
<tr>
<td>Agency Participation Agreement</td>
<td>APA</td>
<td>The agreement between NCCEH and HMIS Participating Agencies that specifies the responsibilities of Participating Agencies and allows agencies to have HMIS licenses.</td>
</tr>
<tr>
<td>Agency Tree</td>
<td>Provider Tree</td>
<td>HMIS is built using a database structure often referenced as a “tree.” This includes an organization and all of its HMIS participating projects. A diagram of the current HMIS@NCCEH structure can be found in Appendix A. The tree is constructed of “provider pages.” Each page is typically all or part of a Participating Agency’s funded programs. The pages serve to associate client enrollments or services with a project or as a place holder for the</td>
</tr>
</tbody>
</table>
By-Name List | BNL | A By-Name List is a list of persons experiencing homelessness within a specific jurisdiction in a specific time period. By-Name Lists can be comprehensive, meaning they include all people experiencing homelessness, or focused, meaning they contain persons with certain subpopulations, (ex. chronic or veteran), or prioritization characteristics. By-Name Lists are frequently used within collaborative multi-partner meetings known as case conferencing sessions to link appropriate homeless persons with housing opportunities that best meet their needs.

Continuum of Care | CoC | Planning body charged by HUD with guiding the local response to homelessness. The CoC is responsible for designating the HMIS Lead Agency to operate HMIS and participating in the structures (Advisory Board) to oversee effective operations of HMIS.

Coordinated Entry | CE | HUD requires communities to design and implement coordinated entry to be eligible to receive HUD homeless program funding. Coordinated entry systemizes access and referral to homeless resources based on a standardized assessment of need and priorities established by the community.

Covered Homeless Organizations | CHO | An organization that contributes data to HMIS, as defined in HUD’s Data and Technical Standards for HMIS.

External Visibility |  | Client data visibility in HMIS between different agencies and their subordinate provider pages that do not have default visibility on each other’s data. This visibility in HMIS is governed by and set up according to an executed Sharing Agreement between the agencies.

Family and Youth Services Bureau | FYSB | A division of the U.S. Department of Health and Human Services (DHHS), the Family and Youth Services Bureau provides federal resources to address homelessness among youth. FYSB oversees the Runaway and Homeless Youth Program

Health Insurance Portability and Accountability Act of 1996 | HIPAA | The Health Insurance Portability and Accountability Act of 1996, particularly the Privacy Rule under Title II, regulates the use and disclosure of Protected Health Information (PHI) held by covered entities and business associates. HIPAA is the base operational privacy rule on which the HMIS privacy rule is structured.

Homeless Definition |  | See Homeless Definition Crosswalk. The HEARTH Act defines 4 categories of homelessness. Not all projects can serve all categories, and some may utilize a different definition when delivering services. HMIS has adopted the HUD definition for counting persons experiencing homelessness.
- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 3: Homeless under other Federal Statutes
<table>
<thead>
<tr>
<th>Homeless Management Information System</th>
<th>HMIS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A data system that meets HUD’s HMIS requirements and is used to measure homelessness and the effectiveness of related service delivery systems. HMIS is also the primary reporting tool for HUD homeless service grants as well as for other public streams of funding related to homelessness.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HMIS@NCCEH</th>
<th>HMIS</th>
</tr>
</thead>
<tbody>
<tr>
<td>The HMIS implementation for Durham, NC Balance of State, and Orange Continuums of Care. HMIS@NCCEH is operated by the North Carolina Coalition to End Homelessness.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HMIS Bed Coverage Rate</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>HMIS bed coverage rate refers to the beds dedicated to serve people experiencing homelessness that participate in HMIS. To determine bed coverage, the beds on HMIS are divided by the total number of beds dedicated for occupancy by people experiencing homelessness in a geographic area.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HMIS Software Solution Provider</th>
<th>Vendor</th>
</tr>
</thead>
<tbody>
<tr>
<td>The HMIS Software Solution Provider is the vendor that develops, hosts, and maintains the software to HUD’s specifications. HMIS@NCCEH currently utilizes ServicePoint software by WellSky. The HMIS Lead Agency (NCCEH) executes a contract with the HMIS Software Solution Provider on behalf of CoCs and Participating Agencies.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HMIS User Agreement</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Signed agreement governing each individual user’s participation in the system.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Housing Inventory Count</th>
<th>HIC</th>
</tr>
</thead>
<tbody>
<tr>
<td>The HIC is where all residential projects (both HMIS-participating and non-participating) specify the number of beds and units available to persons experiencing homelessness within a jurisdiction. The numbers are recorded in the Participating Agency’s HMIS provider pages, (for HMIS participating projects), or in “shell” provider pages (for non-participating agencies) and reported annually to HUD. The HIC is created alongside the Point-in-Time Count.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Housing Opportunities for Persons with AIDS</th>
<th>HOPWA</th>
</tr>
</thead>
<tbody>
<tr>
<td>HOPWA is a federal program that provides housing assistance and related supportive services for persons with HIV/AIDS, and family members who are homeless or at-risk of homelessness. This project has different project reporting requirements than the other HUD-funded projects in this document.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Housing and Urban Development</th>
<th>HUD</th>
</tr>
</thead>
<tbody>
<tr>
<td>The U. S. Department of Housing and Urban Development (HUD) is a federal Agency dedicated to strengthening and supporting the housing market.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Length of Stay</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A common variable in reports used to determine the length of time a client was served by a project. These methods vary by project type. Details on methodology can be found in the HMIS Standard Reporting Terminology.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Michigan Coalition Against Homelessness</th>
<th>MCAH</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Michigan Coalition Against Homelessness is a nonprofit membership organization that is an advocate for individuals and families who are homeless or at-risk of becoming homeless, and the agencies that serve them. MCAH serves as the HMIS Lead Agency for the NC HMIS project that serves nine North Carolina Continuums of Care:</td>
<td></td>
</tr>
</tbody>
</table>
### North Carolina HMIS Governance Committee

**GC**

The NC HMIS Governance Committee is composed of representatives from the 9 North Carolina CoCs that use NC HMIS and provides direct oversight of the NC HMIS project.

### North Carolina Homeless Management Information System

**NC HMIS**

The regional Homeless Management Information System(s) for 9 of North Carolina’s 12 Continuums of Care. See www.nchmis.org.

### Participating Agency

An organization that has signed the appropriate agreements to join HMIS, has active HMIS users, and enters client data for at least one Participating Agency program into HMIS. Participating Agencies include but are not limited to CHOs.

### Personally Identifiable Information

**PII**

Personally Identifiable Information is a category of sensitive information that is associated with an individual. It should be accessed only on a strict need-to-know basis and handled and stored with care. Before any portion of the HMIS client record, outside of the Client Profile, can be shared, a Sharing Agreement and a client signed release of information must be in place.

### Point-in-Time Count

**PIT Count**

An annual, count of people experiencing homelessness on one night, that is required of all CoCs by HUD during the last week of January. Additionally, communities may collect PIT Counts during different times of the year. More details are available on [HUD’s website](#).

### Projects for Assistance in Transition from Homelessness

**PATH**

PATH programs are funded by the Substance Abuse and Mental Health Services Administration (SAMHSA). Programs provide services to people experiencing homelessness and mental illness, primarily through street outreach, to link them to housing and services. This project has different reporting requirements than HUD-funded projects and uses HMIS to collect this information.

### Project Types

**HUD defines 12 Project Types in HMIS:**

- Coordinated Entry (CE): A CoC project that coordinates assessment and referrals of persons seeking housing and/or services and may include the use of a comprehensive and standardized assessment tool.
- Day Shelter (DS): A project that provides daytime facilities and services for persons experiencing homelessness.
- Emergency Shelter (ES): Overnight shelters or shelters with a planned length of stay of less than 3 months.
- Transitional Housing (TH): Transitional environments with a planned LOS of not more than 2 years that provide supportive services.
• PH – Housing Only: (PH): Permanent Housing that may be supported by a voucher but does not have services attached to the housing.
• PH – Other Housing with Services (OPH): Permanent Housing for people with lived experience of homelessness but without disabling conditions including case management services.
• PH - Permanent Supportive Housing (PSH): Permanent Housing for people with lived experience of homelessness and disabling conditions including case management services.
• Rapid Rehousing (RRH): A project that rapidly rehouses people experiencing Literal Homelessness.
• Homeless Prevention (HP): A project that helps people who are at imminent risk of losing housing to retain their housing.
• Street Outreach (SO): A project that serves persons living unsheltered who are living on the street or other places not meant for habitation.
• Supportive Services Only (SSO): A project that provides services to persons without a residential component. These projects often provide case management and other forms of support and meet with clients in an office, at the client’s home, or in a shelter.
• Safe Haven (SH): A project that provides low-demand shelter for hard-to-serve persons with severe disabilities. The clients have often failed in other sheltering environments.
• Other: A project that cannot be categorized as any of the above options
• HUD defines the project descriptor data elements in the HMIS Data and Technical Standards item 2.4.

Provider Pages

The Provider Page is the object in ServicePoint that organizes the database. Each homeless Participating Agency and all of its associated programs will have a separate page with administrative settings customized according to the program/Participating Agency need in the HMIS. Different levels of provider pages develop the fundamental structure of HMIS@NCCEH, CoC, Participating Agency, and Project data. Provider pages connect entries/exits, service transactions, and client profiles to a project for reporting purposes. Non-homeless agencies or programs can also have provider pages in HMIS, but all homeless agencies must have a provider page for the HIC.

Release of Information

ROI

Release of Information refers to both the electronic ROI in HMIS and paper form(s). Signed paper form(s) is also required for the client to authorize this visibility in HMIS and for coordination of services between agencies outside of the HMIS. An electronic ROI must be completed to indicate the client’s response to the signed paper form(s).

Runaway and Homeless Youth Program

RHY

Overseen by the Family Youth Services Bureau, the Runaway and Homeless Youth programs support street outreach, emergency shelter, transitional living, and maternity group homes for youth experiencing homelessness.

Sharing

Sharing refers to the exchange of client information, including PII for data uses described in the HMIS Public Notice and/or Privacy Policy.

Sharing Agreement

The Agreement between agencies that elect to share information using the HMIS. The Agreement prevents the re-release of data, and in combination with the Participation Agreement, defines the visibility configuration of the HMIS Provider Pages.
| **System Administrator** | **SA** | System Administrators maintain the HMIS software implementation in accordance with HUD and other funding regulations and evaluates HMIS activities. They also act as a liaison between the Continuum of Care, community partner agencies, stakeholders, and assist in the generation and submission of program and community-level data and reports from the HMIS. |
|**User Agreement & Ethical Standards** | | The document each HMIS User signs that defines the HMIS standards of conduct. |
|**Visibility** | | Refers to whether a provider page can view client data that has been entered into another provider page. HMIS visibility is configured separately in each provider page. Visibility can be configured by individual provider pages and/or by Visibility Groups. |
|**Visibility Group** | | A Visibility Group is a defined group of Provider Pages where data is shared. Internal Visibility Groups control internal sharing within an organization. Internal Visibility is governed by a Participating Agency’s internal privacy rule. External Visibility Groups control sharing with other agencies and are defined by a Sharing Agreement. |
|**Youth (Homeless Youth)** | | Homeless Youth are youth who lack a fixed, regular, or adequate nighttime residence. Depending on the program and funding source, the age and definition of youth homelessness varies. Some youth programs serve persons up to 18 years of age, while other definitions consider youth up to the age of 21 or 24. Additionally, the US Department of Education considers youth that are sharing housing due to the loss of housing or economic hardship to be homeless for purposes of its programs. |
I. POLICIES AND PROCEDURES SUMMARY

A. Policy Disclaimers and Updates

Operating Policies and Procedures defined in this document represent the minimum standards of participation on the HMIS project and represent general “best practice” operational procedures.

Operational standards in this document are not intended to supersede grant specific requirements and operating procedures as required by funding entities.

The HMIS Operating Policies and Procedures are updated routinely as HUD publishes additional guidance or as part of an annual review. Draft updates will be reviewed at the HMIS Advisory Board and/or HMIS subcommittee. Before being finalized, the HMIS Policies and Procedures will be formally approved by the HMIS Advisory Board. To allow for the evolution of compliance standards without reissuing core agreements, updated policies supersede related policies in any previously published Policies and Procedures document or agreements. Any changes from the previous year will be highlighted. A current copy of the HMIS Policies and Procedures may also be found on the NCCEH website.
II. AGREEMENTS, CERTIFICATIONS, LICENSES AND DISCLAIMERS

CoCs, agencies, and users are required to uphold specific rules and responsibilities as participants in the HMIS.

A. HMIS Governance Charter
According to 24 CFR 578, CoCs are responsible for HMIS Governance, including (but not limited to) designating the HMIS Lead, approving policies and procedures, and monitoring. All CoCs participating on the HMIS must sign the HMIS Governance Charter that supports the ability for multiple CoCs to participate on a single HMIS. The HMIS Governance Charter established an Advisory Board to govern the HMIS project. Documents related to HMIS Governance can be found on the NCCEH website.

B. Project Participation: Required Agreements, Official Documents, and Policies
All Participating Agencies must have the following fully executed documents on file and follow the policies and directives contained therein:

1. **Agency Participation Agreement**
   Agencies providing services or housing to people experiencing homelessness may request permission to participate in HMIS and become a Participating Agency. All agencies approved to access HMIS must have signed an Agency Participation Agreement and agree to abide by the policies and procedures as outlined in this document. The Agency Participation Agreement is a contract between the Participating Agency and NCCEH (HMIS Lead Agency). The Agency Participation Agreement outlines specific requirements on confidentiality, HMIS use, data entry, system security, and reporting. Any questions regarding the terms of the Agency Participating Agreement should be submitted via hmis@ncceh.org for proper routing to NCCEH staff.

2. **Sharing Agreements**
The Participating Agency agrees to develop a plan for all routine sharing practices, if any, with partnering agencies and to document that plan through fully executed Sharing Agreement(s).

3. **Administrative Use Agreements** (if applicable)
   These agreements govern administrative access to the Participating Agency’s data. See administrative access below.

4. **HMIS Privacy Notice (Public Notice)**
Pursuant to the notice published by the Department of Housing and Urban Development (“HUD”) on July 30, 2004, the Participating Agency will prominently display at each intake desk (or comparable location) the HMIS Consumer Notice provided by NCCEH that explains generally the reasons for collecting identified information in the HMIS and the Client rights associated with providing Participating Agency staff with identified data. The Participating Agency will ensure Clients’ understanding of their rights. In addition, if a Participating Agency serves clients whose first language is not English, the Participating Agency must provide a translated version of the HMIS Privacy Notice or interpretation services. The current form of the HMIS Privacy Notice, which may be modified from time to time at the HMIS Advisory Board’s discretion, is available from NCCEH on its website.
5. **Privacy Notice (Privacy Policy)**

Pursuant to the 2004 HUD HMIS Data and Technical Standards Final Notice, the Participating Agency, if it has a public website, will post the HMIS Privacy Practices on its website. In addition, the Participating Agency shall make the HMIS Privacy Practices document readily available upon Client request. If an update regulation is released by HUD, the Participating Agency agrees to follow the updated regulations. The current edition of the HMIS Privacy Policies document, which may be modified from time to time at the HMIS Advisory Board’s discretion, is available from NCCEH on its website. Participating Agencies may adopt the HMIS sample notice or integrate HMIS language into their existing notice. All Privacy Notices must define the uses and disclosures of data collected on HMIS, including:

   a. The purpose for collection of client information.
   b. A brief description of policies and procedures governing privacy, including protections for vulnerable populations.
   c. Data collection use and purpose limitations. The uses of data must specify release of aggregate, de-identified data for research or other reporting purposes.
   d. The client’s right to copy, inspect, or correct their record. Agencies may establish reasonable norms for the time and cost related to producing any copy from the record. The Participating Agency may deny a request to correct information, but the Participating Agency must inform the client of its reasons in writing within 60 days of the request.
   e. The client complaint procedure.
   f. Notice to the client that the Privacy Notice may be updated over time and applies to all client information held by the Participating Agency.

6. **Confidentiality Policy**

A board-approved Confidentiality Policy governing the privacy and security standards for the Participating Agency.

7. **Grievance Policy**

A board-approved Grievance Policy outlining a structured process for resolving complaints or grievances against, or within, the organization.

C. **User Licenses and Roles in HMIS**

1. **Basic HMIS User Requirements**

   a. A fully executed HMIS User Agreement governing the individual’s participation in the system. All HMIS Users must sign and agree to and abide by the HMIS User Agreement.
   b. All users are required to complete all required components of new user training, including full privacy training when they are first licensed. The HMIS Lead Agency will determine which trainings are required based on how the user will interact with the HMIS. All Users are required to complete an updated privacy training at least annually.
   c. Users are prohibited from editing their own HMIS file or files of immediate family members.
   d. Users will agree to disclose a conflict of interest to their Participating Agency Administrator.
(i) If a user is suspected of violating this policy, the Participating Agency will notify NCCEH and an audit report will be run to determine if there was an infraction.

2. **Agency Administrator Requirements**
   a. All Participating Agencies must have at least one assigned Agency Administrator.
   b. Reports Training (for report licensed users only).
   c. Ensure the Participating Agency’s HMIS users complete annual privacy training.
   d. Perform oversight activities defined in Privacy and Security Plan(s).

3. **System Administrator Requirements**
   a. A fully executed HMIS System Administrator Agreement.
   b. Criminal background checks must be completed on all HMIS staff with System Administrator user access.
   c. Provider Page Training and Workflow Training for all workflows.
   d. Reports Training (System Administrators are tasked with supporting data quality as well as monitoring outcomes and other performance issues).
   e. System Administrator Training – This training usually takes place several weeks after a new System Administrator has been in their position.
   f. All System Administrators are required to read and understand the current version of HUD Data Standards and any updates issued by HUD to understand the rules of the HMIS.
   g. HUD Report Training (LSA, PIT/HIC, APR, etc.).

D. **Administrative Access**

Administrative access may be granted to HMIS staff, funders, or contractors for administrative purposes.

1. **System Administrators**
   a. Purpose: Designated staff in HMIS will be responsible for operating the HMIS.
   b.Extent: Users have full HMIS Access (SAII, SAI user role in application).
   c. Limits: There are no restrictions on users, however System Administrators do not enter client level data in HMIS.

2. **Contractors**
   a. Purpose: NCCEH, CoC, or a Participating Agency may hire contractors to support HMIS functions.
   b. Extent: A scope of work should be defined for each contractor relationship. User role in application will be determined based on scope of work.
   c. Limits: Contractors are not permitted to alter client-level data in HMIS, unless specifically defined to support a Participating Agency.
   d. Required Documentation/ Training: Contractors will be required to sign an Administrative Use Agreement and abide by all HMIS policies and procedures. Training
needs will be determined on a case-by-case basis and can include all levels of HMIS Training by NCCEH, HMIS Software Solutions provider, or other knowledgeable entity.

3. Funders
   a. Purpose: Participating Agencies may enter into a grant agreement with a funder who wishes to utilize HMIS for grant monitoring and reporting.
   b. Extent: Funders will only be provided access to their funded HMIS project(s) at the direction of the Agency Administrator via a Sharing Agreement. Limited to read-only user role in application.
   c. Limits: Funders will only be provided read-only access to the database.
   d. Required documentation/training – Funders will be required to sign an Administrative Use Agreement.
III. PRIVACY

A. Privacy and Security Plan
HMIS is committed to making the project safe for Participating Agencies and the clients whose information is recorded on the system. All records entered into and downloaded from the HMIS are required to be kept in a confidential and secure manner.

1. Oversight/Auditing
   a. All Participating Agency Administrators with support of Participating Agency leadership must follow privacy and security procedures outlined in Agency Administrator Roles and Responsibilities.
   b. NCCEH will investigate breach of security or confidentiality within one business day of discovery by running applicable audit reports. If NCCEH determines that a breach has occurred, and/or the staff involved violated privacy or security guidelines, the client record(s) in question must be immediately locked down, and NCCEH will submit a written report to the HMIS Advisory Board Executive Committee within two business days. A preliminary Corrective Action Plan will be developed and implemented within five business days. Components of the plan must include, at minimum, supervision and retraining. It may also include removal of HMIS license, client notification if a breach has occurred, and any appropriate legal action.
   c. NCCEH will conduct routine audits of Participating Agencies to ensure compliance with the Operating Policies and Procedures. The audit will include a mix of system, self-report, and on-site reviews. NCCEH will document the inspection and any recommendations made, as well as schedule follow-up activities to identify any changes made to document compliance with the Operating Policies and Procedures.

2. Participating Agency Requirements
   a. Privacy Policy
      All Participating Agencies are required to have a Privacy Policy that is shared with clients through a Privacy Notice. Participating Agencies may elect to use the sample HMIS Privacy Notice provided by NCCEH. All Privacy Policies must include:
      (i) Procedures defined in the Participating Agency’s Privacy Policy.
      (ii) If a Participating Agency reasonably believes that a client is a victim of abuse, neglect, or domestic violence, or if a client reports that he/she is a victim of abuse, neglect, or domestic violence, a more detailed discussion about HMIS with the client is recommended. If entering data into HMIS poses a potential safety risk, the following protections are available to secure the record:
         1. Closing of the profile search screen so that only the serving Participating Agency may see the record.
         2. The right to refuse sharing, if the Participating Agency has established an external sharing plan.
         3. The right to be entered as an unnamed record, where identifying information is not recorded in the system, and the record is located
through a randomly generated number (Note: This interface does allow for de-duplication by looking at key demographic identifiers in the system.)

4. The right to have the client profile inactivated in HMIS. Security of hard copy files: Agencies may create a paper record by printing the assessment screens located within HMIS. These records must be kept in accordance with the procedures that govern all hard copy information (see 5. Hard copy data below).

(iii) Client Information Storage and Disposal: Users may not store information from the system on personal portable storage devices. The Participating Agency will retain the client record for a period of seven years, after which time the forms may be discarded in a manner that ensures client confidentiality is not compromised.

(iv) Remote Access and Usage: The Participating Agency must establish a policy that governs use of the system when access is approved from remote locations. The policy must address:

1. The strict control of the use of portable storage devices with client identifying information.
2. The environments where use is approved. These environments cannot be open to public access and all paper and/or electronic records that include client identified information must be secured in locked spaces or be password controlled.
3. All browsers used to connect to the system must be secure. If accessing through a wireless network, that network must be encrypted and secured.

b. **Protection of Hard Copy Data**

Agencies must protect hard copy data that includes client identifying information from unauthorized viewing or access.

(i) Client files must be locked in a drawer/file cabinet.
(ii) Offices that contain client files must be locked when not occupied.
(iii) Client files must not be left visible to unauthorized individuals.

c. **Privacy Script**

The Participating Agency must provide a Privacy Script to all staff charged with explaining privacy rights to clients in order to standardize the privacy presentation. The sample Privacy Script provided by NCCEH may be used. The script must:

(i) Be developed with Participating Agency leadership to reflect the Participating Agency’s Sharing Agreements and the level of risk associated with the type of data the Participating Agency collects and shares.
(ii) The script should be appropriate to the general education/literacy level of the Participating Agency’s clients.
(iii) A copy of the script should be available to clients as they complete the intake interview.
(iv) All Participating Agency staff responsible for client interaction must be trained in use of the script

d. **Sharing Data in HMIS with Other Agencies**

Agencies that plan to share information through the system must sign a Sharing Agreement that governs External Visibility Groups in HMIS.

(i) The Sharing Agreement prescribes the release of information between agencies shared under the terms of the agreement.

(ii) Participating Agencies may share different portions of a client record with different partners and may sign multiple Sharing Agreements to define a layered sharing practice.

(iii) Participating Agencies may share all or select projects. If there is a project with stricter privacy laws, for example 42 CFR Part 2, sharing for these projects will be handled in accordance to the applicable law.

1. If a Participating Agency is a HIPAA Covered Entity, A HIPAA compliant Authorization to Release Confidential Information is also required for planned sharing or re-release of data.

(iv) The signatories on the Sharing Agreement must be representatives who have been authorized to sign such an agreement by the Participating Agency’s senior leadership and/or by the Participating Agency Board of Directors.

(v) All members of a Sharing Agreement must be informed that, by sharing, they are creating a common electronic record that can impact data reflected in their reports. Members of the sharing group must agree to communicate and negotiate data conflicts.

(vi) No Participating Agency may be added to the agreement without the approval of all other Participating Agencies.

1. Documentation of that approval must be available for review and may include such items as meeting minutes, email response, or other written documentation.

2. Participating Agency approval of additions or changes to a Sharing Agreement must be approved by a staff member with authorization to make such decisions on behalf of the Participating Agency.

(vii) When a new member is added to the Sharing Agreement, a new Visibility Group must be created. A new member may not be added to an existing External Visibility Group.

(viii) Participating Agencies must have client-level Release(s) of Information that are consistent with Sharing Agreements detailing the type of data the Participating Agency plans to share.

(ix) If the Participating Agency integrates the HMIS Client Release of Information into their existing releases, the release must include the following components:

1. A brief description of HMIS including a summary of the Privacy Notice.

2. A specific description of the Client Profile Search Screen and an opportunity for the client to request that the screen be closed.
3. A listing of the Participating Agency’s sharing partners (if any) and a description of what is shared. These sections must reflect items negotiated in the Participating Agency’s Sharing Agreement(s).
4. An expiration date of the agreement.

**e. Electronic Release of Information**
An electronic ROI in HMIS is needed to indicate an HMIS Release of Information has been completed for each client.

(i) NCCEH System Administrators establish Internal Visibility within a Participating Agency or sharing only between a Participating Agency’s provider pages, by creating visibility group(s) that include all the Participating Agency’s provider pages where sharing is planned and allowed by law.

1. Internal Visibility does not require a signed HMIS Release of Information unless otherwise specified by law.
2. Unless otherwise specified by law, when new provider pages are added to the Agency Tree, they will be included in the existing internal visibility group. The information available to that provider page will include all information covered by the visibility group from the beginning date of the Group – sharing will be retroactive.

(ii) Agencies may elect to share information with other agencies, a practice known as External Sharing, by negotiating a Sharing Agreement (see Section III A 2 d above).

1. External Visibility does require a signed HMIS Release of Information
2. A signed and dated HMIS Release of Information must be stored in the Client Record (paper or scanned onto the system) for all electronic ROIs that release data between different agencies.
3. Retroactive Sharing or sharing historic information between two or more agencies without client consent is not permitted on HMIS.
4. NCCEH’s procedure for pulling a client’s housing history across the entire database to verify a client’s eligibility for specific housing options requires that client consent is provided. A client may request this directly using the online form, or a Participating Agency may facilitate this request. The form is available at www.ncceh.org/hmis/clientconsent.

(iii) Client information entered in HMIS may be used to create By-Name Lists to be used for case conferencing and prioritization meetings provided that the client provides written consent to participate in a By-Name List and/or prioritization process. Consent for participating in this process is built into the HMIS Release of Information.

**f. Verbal Release of Information**
Agencies are required to have the HMIS ROI in the client file indicating verbal consent was obtained and reviewed with the client. Written consent must be obtained during the first in-person meeting with client.
g. **Equal Access**
See HMIS Privacy Policy for additional details related to equal access. The Participating Agency must have a procedure to provide privacy notices to clients who have visual or hearing impairments or with limited English proficiency. For example:
   (i) Provisions for Braille or audio
   (ii) Available in multiple languages
   (iii) Available in large print
   (iv) Access to translation services upon request

h. **Upholding Privacy Practices**
Participating Agencies are required to maintain a culture that supports privacy.
   (i) Staff must not discuss client information in the presence of others without a need to know.
   (ii) Staff must eliminate unique client identifiers before releasing data to the public.
   (iii) The Participating Agency must configure workspaces for intake that supports the privacy of client interaction and data entry.
   (iv) User accounts and passwords must not be shared between users, or visible for anyone unauthorized to see.
   (v) Project staff must not save reports with client identifying data on portable media. Participating Agencies must be able to provide evidence of users receiving training on this procedure through written training procedures or meeting minutes.
   (vi) Staff must be trained regarding use of email communication, texting, file sharing, and other electronic means of transferring data related to client services.
      1. By-Name Lists may not be printed with client identifying information without obtaining written client consent.
   (vii) Non-Licensed Participating Agency staff must follow all privacy procedures related to the confidentiality of HMIS client data.

3. **Data Security**
   a. All licensed Users of the HMIS must be assigned Access Levels that are consistent with their job responsibilities and their business “need to know.”
   b. All computers must have network threat protection software with automatic updates.
      (i) Participating Agency Administrators or designated staff are responsible for monitoring all computers that connect to the HMIS to ensure that:
         1. The threat protection software is up to date.
         2. That various system updates are automatic, unless a specific, documented reason exists to maintain an older version of the software.
         3. Operating System updates are run regularly.
   c. Physical access to computers that connect to the HMIS must be controlled.
      (i) All workstations must be in secured locations (locked offices).
      (ii) Workstations must be logged off when not manned.
      (iii) All workstations must be password protected.
(iv) All HMIS Users are prohibited from using a computer that is available to the public.

d. If staff will be using HMIS outside of the office, such as working from home, the computer and environment of entry must meet all the standards defined above.

e. Downloads from the computer may not include client identifying information.
IV. DATA BACKUP AND DISASTER RECOVERY PLAN

HMIS data is housed on a secure server by the HMIS Software Provider with nightly off-site backup. In case of a significant system failure at the main data center, HMIS can be brought back online within approximately four hours.

A. Backup Details for the HMIS
See Securing Client Data for a detailed description of data security and the Basic Disaster Response Plan from the HMIS Software Provider

B. HMIS Project Disaster Recovery Plan
In the event of a major system failure:

1. Should a disaster occur at WellSky, which affects the functionality and availability of ServicePoint, NCCEH will notify all users and HMIS Advisory Board. When appropriate, NCCEH will notify the HMIS Advisory Board of recovery activities and related timelines.

2. If a failure occurs after normal business hours, HMIS staff will report the system failure to WellSky using their emergency contact line.

3. NCCEH will notify WellSky if additional database services are required.
V. SYSTEM ADMINISTRATION

The following describes the typical list of training requirements, required meetings, and responsibilities for a NCCEH System Administrator.

A. Meetings in Which NCCEH System Administrators Regularly Participate

1. Regular CoC meetings and/or workgroups as determined by the CoC.
2. The CoC Reports Committee or meetings where data use and release are discussed.
3. The HUD System Administrator calls.
4. Regular Agency Administrator/User Meetings within the CoC.
5. Calls and webinars hosted by the HMIS Software Vendor.

B. NCCEH System Administrator Responsibilities

1. Help Desk and Technical Support
   a. NCCEH provides front-line technical support/technical assistance for Users and Participating Agencies. This support includes resetting passwords and troubleshooting/problem solving for Users and Agencies.
   b. Where applicable, NCCEH may train Agency Administrators to do fundamental system support activities.
   c. NCCEH builds relationships within the Participating Agencies they serve, working to understand the business practices of these agencies, and assisting them with mapping these business practices onto the system. The NCCEH staff will be available, upon request, to provide advanced technical support.

2. User Setup
   a. NCCEH staff will set up new users in HMIS.
   b. NCCEH staff will supervise license allocation for Users and Agencies When necessary or requested, NCCEH will purchase additional licenses directly for the CoC.

3. Provider Page Setup
   a. NCCEH will ensure that the Participating Agency’s Provider Pages are set up correctly per the HUD Data Standards.
   b. NCCEH will ensure proper visibility is established for the Provider Pages for both Internal Visibility Groups and External Visibility Groups, per Sharing Agreements.

4. Communication
a. NCCEH will host regular User and Agency Administrator meetings for Users of the system. These meetings will cover important news on changes in the system, items of local interest within the CoC, and issues identified by NCCEH System Administrators.

b. NCCEH will share any key news items of local impact, interest, or relevance to the Users and Agency Administrators in the CoC they serve.

5. Training

a. NCCEH will inform Agency Administrators and Users of required and recommended system trainings that are available through the NCCEH training website.

b. NCCEH will provide localized training to CoC users and agencies for issues or items of importance related to the local community. These may include local PIT/HIC training, guidance on local data cleanup, or specific guidance on proper workflow and system usage that are identified through an audit process.

c. NCCEH will provide training for Users on initiatives identified and agreed upon between the NCCEH and the local CoC.

6. HUD-Required Activities (Including AHAR, LSA, PIT/HIC, HMIS APR, SPMs, HUD NOFA)

a. NCCEH will work directly with CoC leadership to complete CoC-wide HUD reporting activities such as the AHAR, LSA, PIT/HIC, System Performance Measures, and the CoC HUD NOFA submission. NCCEH also assist the CoC with work surrounding state and local funding initiatives, which require data from the HMIS.

b. NCCEH will assist with completing the HMIS Annual Performance Report (APR) for the CoCs they serve, if the CoC has a HUD-funded CoC HMIS grant.

c. NCCEH System Administrators will provide support/technical assistance for Agencies completing the CoC APR and/or ESG CAPER within their jurisdiction. This includes technical assistance with data quality issues, reporting issues, etc.

7. Local CoC Reporting

a. NCCEH will be responsible for providing reports to the CoC. These include, but are not limited to:
   (i) CoC-wide demographics, performance outcomes, and data quality reports that are used for informational and evaluation purposes.
   (ii) Final reports on submissions made to HUD for various HUD-mandated activities such as the AHAR, LSA, PIT/HIC, SPMs, and the HMIS APR.
   (iii) General requests for data of interest to the local CoC.
   (iv) Any additional reporting requirements initiated by HUD that are required of the local CoC.

b. NCCEH will train local Agency Administrators and Users on how to run reports at the Agency level for the purpose of monitoring data quality and outcomes on a regular basis in the Participating Agency that it serves.

c. NCCEH will be responsible for generating reports on activities and expenditures to the local CoC which he or she serves, as directed by the CoC.

8. CoC/Participating Agency/Project Auditing and HMIS Monitoring
a. NCCEH, collaborating with Participating Agency Administrators, will audit Participating Agencies and projects to ensure compliance with HMIS requirements and HMIS@NCCEH Operating Policies and Procedures. Audit activities may include, but not be limited to:
   (i) Ensuring the Participating Agency has all required contracts, agreements, and policies in place for participation on HMIS.
   (ii) Verifying system Users have completed all required training for system participation.
   (iii) Ensuring provider pages are correctly setup per HUD Standards Guidance.
   (iv) Ensuring Agencies are following appropriate data entry protocol per the funding sources from which they receive funding.
   (v) Monitoring implementation of privacy, to ensure client rights are being protected.
   (vi) Regularly monitoring data quality, completeness, and outcomes to ensure projects are maintaining a high level of compliance with HUD and CoC requirements.
VI. DATA QUALITY PLAN AND WORKFLOWS

A. Provider Page Set Up
   1. Provider page set up is documented in the HMIS Configuration Standard Operating Procedures.

B. Data Quality Plan
   1. Agencies must require documentation at intake of the homeless status of clients according to the reporting and eligibility guidelines issued by HUD in 24 CFR 578. The “order of priority” for obtaining evidence of homeless status are (1) third party documentation, (2) worker observations, and (3) self-certification from the person. Lack of third-party documentation may not be used to refuse emergency shelter, outreach, or domestic violence services.
   
   2. Client information should be entered into HMIS within 10 days of data collection. If the information is not entered on the same day it is collected, the Participating Agency must ensure that the date associated with the information is the date on which the data was collected by:
      a. Entering data into the system using the Enter Data As function.
      b. Backdating the information into the system.
      c. Entering the entry/exit data including the UDEs on the Entry/Exit Tab of ServicePoint.
   
   3. The Participating Agency has a process to ensure the First and Last Names are spelled properly and that the Date of Birth (DOB) and Social Security Numbers are accurate.
      a. Identification (ID) should be requested at intake to support proper spelling of the client’s name, as well as, the recording of the DOB.
      b. If no ID is available, staff should request the legal spelling of the person’s name. Staff should not assume they know the spelling of the name.
      c. Agencies may enter data for clients with significant privacy needs under the “unnamed record” feature of the system. However, because identifiers are not stored using this feature, Users should take great care in creating the unnamed client by carefully entering the First and Last Name and the DOB. Agencies must maintain names and ServicePoint ID number crosswalks off-line in a secure location as this information will be required to find the record again.
   
   4. Agencies must update income, non-cash benefits, and health insurance information at least annually and at exit, or at the frequency specified by program requirements.
      a. For Permanent Housing Projects, the Housing Move-In Date must be completed on an Interim Update when the client moves into housing.
      b. Annual Reviews must be completed in the 30 days prior or after the anniversary of the head of household’s entry into services.
      c. For all other projects, any income(s) no longer available to the client must be closed on the day before intake (if data is shared from another provider), annual review, and exit.
   
   5. Agencies must have an organized exit process that includes:
a. Educating clients and staff on the importance of planning and communication regarding Discharge Destination and outcomes.

b. Discharge Destinations must be properly mapped to the HUD Destination Categories.
   (i) HMIS provides an Exit Destination Guide document to support proper completion of exits. All new staff must have training on this document.
   (ii) Projects must have defined processes for collecting this information from as many households as possible.

c. A procedure for communicating exit information to the person responsible for data entry, if not entering real time.

6. Agency Administrators/staff should regularly run data quality reports.
   a. Report frequency should reflect the volume of data entered into HMIS. Frequency for funded projects will be governed by Grant Agreements, HUD reporting cycles, and local CoC Written Standards. However, higher volume projects such as shelters and services only projects should review and correct data at least monthly. Lower volume projects such as Transitional and Permanent Housing programs should run reports following all intakes and exits and quarterly to monitor the recording of services and other required data elements, including annual updates of income and employment.
   b. The project entry and exit dates must be recorded for all participants upon project entry and exit. Entry dates must record the first day of services or project entry. A new project entry date is required for each period/episode of services. Exit dates must record the last day of residence before the participant left the shelter/housing project or the last day a service was provided.
   c. Data quality screening and correction activities should confirm all required data is complete and include:
      (i) Correction of missing or inaccurate information in Universal Data Element fields.
      (ii) Completion of the Relationship to Household assessment questions.
      (iii) Completion of the 3.917 Living Situation series of questions.
      (iv) Completion of the 3.16 Client Location question.
      (v) Completion of the Domestic Violence questions.
      (vi) Completion of the HUD Verifications for all Income, Non-Cash Benefits, Health Insurance, and Disability sub-assessments.
      (vii) Completion of the Housing Move-In Date for all PH projects.
      (viii) Completion of all of the project specific data elements, as required by the various funding sources supporting the project.
   d. Participating Agencies must audit un-exited clients in the system by using the Length of Stay and un-exited Client Data Quality Reports.

7. CoCs and Agencies are required to review Outcome Performance Reports/System Performance Measures reports defined by HUD and other funding organizations. Measures are based on Project Type. The CoC Lead Agency, in collaboration with the CoC Reports Committee or other designated committee, establishes local benchmark targets for performance improvement on shared measures.
C. Workflow Requirements

1. Provider Page Configuration settings must use the assessments that are appropriate for the funding stream.

2. Users performing data entry must follow workflow guidance.

3. If using paper, the intake data collection forms must align correctly with HMIS Assessments.

4. 100% of clients should be entered into HMIS with accurate and complete information no later than 10 days from the intake date.

5. Agency Administrators must actively monitor project participation and client exits. Clients must be exited within 30 days of last contact, unless project guidelines specify otherwise.

6. All required project information must be collected.
   a. All Participating Agencies are required to enter at minimum the Universal Data Elements for all clients.
   b. Projects that serve clients over time are required to complete additional updates as defined by the funding stream. If the Participating Agency is not reporting to a funding stream, they are required to update client data annually by adding an interim and completing the annual assessment in HMIS.
VII. RESEARCH AND ELECTRONIC DATA EXCHANGES

A. Electronic Data Exchanges

1. Agencies electing to import data to HMIS must ensure:
   a. Project collects all of required data elements by HUD or Federal Partner Programs.
   b. Project data adheres to data quality policy.
   c. Project has staff to manage exports/imports at SAll level in ServicePoint or can pay for technical services to ensure data extraction integrity, data quality control, and periodic exports.
   d. Data import makes sense (cost of import vs client volume to enter data, etc.).
   e. Cost of HMIS@NCCEH (or software vendor) technical assistance and data integration services are covered by CoC or Participating Agency.

2. Data Export
   a. Agencies exporting data from HMIS must certify the privacy and security rights promised participants on HMIS are met on the destination system. If the destination system operates under less restrictive rules, the client must be fully informed and approve the transfer during the intake process. The Participating Agency must have the ability to restrict transfers to those clients that approve the exchange.
   b. NCCEH or your local CoC may elect to participate in de-identified research data sets to support research and planning.
      (i) De-identification will involve the masking or removal of all identifying or potential identifying information such as the Name, Unique Client ID, SS#, DOB, address, agency name, and agency location.
      (ii) Geographic analysis will be restricted to prevent any data pools that are small enough to inadvertently identify a client by other characteristics or combination of characteristics.
      (iii) Projects used to match and/or remove identifying information will not allow a re-identification process to occur. If retention of identifying information is maintained by a “trusted party” to allow for updates of an otherwise de-identified data set, the organization/person charged with retaining that data set will certify that they meet medical/behavioral health security standards and that all identifiers are kept strictly confidential and separate from the de-identified data set.
      (iv) CoCs will be provided a description of each study being implemented.
   c. NCCEH or the local CoC may elect to participate in identified research data sets to support research and planning.
      (i) All identified research must be governed through an Institutional Research Board, including requirements for client informed consent.
      (ii) CoCs will be provided a description of each study being implemented.
APPENDIX A: HMIS STRUCTURE

HMIS@NCCEH Data Structure “Tree”