**Allegheny County (PA-600)**

**HMIS**

**Policies and Procedures Manual**

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# Revision History

Approved 02/06/2017

# Introduction

The Allegheny County HMIS (Homeless Management Information System) exists, as required by the U.S. Department of Housing and Urban Development (HUD), to record and store client-level information about the characteristics and needs of persons who use homeless housing and supportive services; to produce an unduplicated count of homeless persons and achieve other reporting needs; to understand the extent and nature of homelessness within Allegheny County; and to understand patterns of service usage and measure the effectiveness of projects and systems of care. The following policies and procedures exist to help ensure that the Allegheny County HMIS is compliant with HUD regulations and best practices, and apply to all HMIS users, participating agencies (referred to by HUD as Contributing HMIS Organizations – CHOs), and the CoC-designated HMIS Lead Agency (DHS). Its purpose is to guide and clarify federal regulations for Allegheny County agencies in their daily operations. It in no way, however, should serve as a substitute for any federal regulations outlined and updated by HUD in its HMIS Data and Technical Standards. All Allegheny County agencies are responsible for maintaining their own compliance with federal regulations as well as any outside applicable regulations such as the Health Insurance Portability and Accountability Act (HIPAA) standards.

# Acronyms

**AHAR** - The Annual Homeless Assessment Report (AHAR) is HUD’s annual report that provides Congress with detailed data on individuals and households experiencing homelessness across the country each year. This report could not be written if communities were not able to provide HUD with reliable, aggregate data on the clients they serve.

**APR** - Annual Performance Report, an annual progress report for all HUD funded housing programs.

**CAPER -** The Consolidated Annual Performance and Evaluation Report for ESG-funded programs.

**CHOs –** A CHO is an organization (including all its affiliates) that records, uses or processes personally identifiable information on clients experiencing homelessness or those at risk of experiencing homelessness for and HMIS (Section 4.1.1, 2004 HMIS Data and Technical Standards).

**CoC-** Continuum of Care. Continuum means the group organized to carry out the responsibilities required under the CoC Program Interim Rule (24 CFR Part 578) and is comprised of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, and law enforcement, and organizations that serve homeless and formerly homeless persons to the extent that these groups are represented within the geographic area and are available to participate.

**DHS** - Department of Human Services; in Allegheny County, the Lead Agency who administers HMIS.

**ESG** - The Emergency Solutions Grant. HUD administers ESG funds to engage homeless individuals and families living on the street, to improve the number and quality of emergency shelters, help operate emergency shelters and provide essential services to residents, rapidly rehouse individuals and families and prevent families and individuals from becoming homeless.

**HAP** - Homeless Assistance Programs, administered by the state of Pennsylvania. HAP administers funding for case management, rental assistance, bridge housing, emergency shelter, and innovative supportive housing programs.

**HIC** - The Housing Inventory Chart. Continuum of Care (CoC) Homeless Assistance Programs Housing Inventory Count Reports provide a snapshot of a CoC's HIC, an inventory of housing conducted annually during the last ten days in January, and are available at the national and state level, as well as for each CoC.

**HMIS** - A Homeless Management Information System (HMIS) is the information system designated by a local Continuum of Care (CoC) to comply with the requirements of CoC Program interim rule 24 CFR 578. It is a locally-administered data system used to record and analyze client, service and housing data for individuals and families who are homeless or at risk of homelessness. HMIS is a valuable resource because of its capacity to integrate and unduplicated data across projects in a community. Aggregate HMIS data can be used to understand the size, characteristics, and needs of the homeless population at multiple levels: project, system, local, state, and national.

**HMIS Lead** - the entity designated by the Continuum of Care in accordance with the HMIS Proposed Rule1 (24 CFR Part 580) to operate the Continuum’s HMIS on the Continuum’s behalf. In Allegheny County, the HMIS Lead is the Allegheny County Department of Human Services (DHS).

**HMIS User** - the individual who uses or enters data in an HMIS or a comparable database approved by the CoC. In Allegheny County, HMIS users are those homeless providers and administrative agents that have access to HMIS and/or that are permitted to enter information into HMIS.

**HMIS System Administrator** - the individual(s) whose job it is to manage the HMIS implementation at the local level: enrolling programs and managing appropriate use, supporting users through connection to or direct provision of user training, and overseeing system setup. The Allegheny County Department of Human Services has designated an HMIS Specialist as the HMIS System Administrator.

**HUD** - The U.S. Department of Housing and Urban Development. HUD serves over 1 million people through emergency, transitional, and permanent housing programs each year.

**PIT** - The Point-In-Time Count. The Point-in-Time (PIT) count is a count of sheltered and unsheltered homeless persons on a single night in January. HUD requires that Continuums of Care conduct an annual count of homeless persons who are sheltered in emergency shelter, transitional housing, and Safe Havens on a single night.

**SOAR** - SSI and SSDI Outreach, Access and Recovery. SOAR is a program designed to increase access to SSI/SSDI for eligible adults who are experiencing or at risk of homelessness and have a mental illness, medical impairment, and/or a co-occurring substance use disorder.

# Roles and Responsibilities

Pursuant to the CoC Governance Charter, the roles and responsibilities for the CoC and HMIS Lead Agency are outlined below. In addition, the roles and responsibilities for homeless organizations and HMIS users are also outlined below.

**Continuum of Care**:

The Homeless Advisory Board (HAB) will:

* Designate a single information system as the official HMIS software for the CoC. The HAB designates the Allegheny County CoC HMIS software developed by Deloitte as the official HMIS software of the CoC.
* Designate an HMIS Lead Agency to operate the HMIS. The HAB designates the Allegheny County Department of Human Services as the HMIS Lead Agency for the CoC.
* Develop and annually review an HMIS Governance Charter
* Maintain documentation evidencing compliance with this governance charter
* Review, revise and approve all required HMIS policies and plans, including a privacy plan, security plan and data quality plan
* Ensure the HMIS is adequately funded
* Regularly monitor the HMIS Lead Agency to ensure the HMIS is administered in compliance with HUD requirements
* Ensure consistent participation of the CoC’s CHOs within the HMIS

**HMIS Lead Agency**:

Allegheny County Department of Human Services Bureau of Homeless Services has been designated as the HMIS Lead Agency in Allegheny County and, as such, has the following responsibilities:

* Host, maintain, backup, recovery, repair, upgrade, customize and enhance the HMIS as well as integrate with warehouse data
* Conduct Training for recipients on the use of the system
* Develop written policies and procedures that comply with all applicable Federal Law and regulations and applicable state and local government requirements
* At least once annually, or upon request from HUD, submit to the CoC an unduplicated count of clients served in the CoC and an analysis of unduplicated counts, when required by HUD
* Submit all reports to HUD as required
* Develop a written privacy policy, per 24 CFR 580.35 (Appendix C)
* Develop a written security policy, per 24 CFR 580.35 (Appendix D)
* Develop a written data quality policy, per 24 CFR 580.35 (Appendix E)
* Ensure completeness, accuracy and consistency of HMIS data (24 CFR 580.37)
* Execute a written HMIS Participation Agreement with each participant, including obligations and authority of the HMIS lead

**Covered Homeless Organizations (CHOs):**

A CHO is any organization (including all its affiliates) that records, uses or processes personally identifiable information on clients experiencing homelessness or those at risk of experiencing homelessness for an HMIS (Section 4.1.1, 2004 HMIS Data and Technical Standards). Any agency participating in the Allegheny County HMIS will abide by all policies and procedures outlined in this manual. Any agency, organization or group who has signed an HMIS Agency Agreement with Allegheny County DHS will be given access to HMIS through trained HMIS users. CHOs are responsible for communicating needs, concerns and questions regarding HMIS directly to the Allegheny County Service Desk or the DHS HMIS Specialist.

**HMIS Users:**

Any individual who uses Allegheny County’s HMIS must have a signed HMIS User Agreement on file with DHS and abide by all policies and procedures in this manual. HMIS users are responsible for ensuring quality, timely data entry; staying knowledgeable about HUD and DHS regulations as they change; being a point of contact for DHS; notifying a DHS of any changes in user access to HMIS, provider address, contact information, adhering to policies and procedures in data collection and privacy and security practices, and correcting data errors as they become known.

# Minimum Computer/Technology Requirements for use of HMIS

HMIS participating agencies, called Covered Homeless Organizations (CHOs), are required to comply with the DHS policy on Minimum Computer/Technology Requirements found in Appendix A.

# User Accounts

**User Account Set Up**

1. New users who want HMIS access must contact the DHS Service Desk and request an Information Systems Account Request (ISAR) form, see appendix B.
2. The form must be signed by the requestor’s supervisor after it has been filled out.
3. The form must be returned to the DHS Service Desk for account set up.
4. Once the form is received, account set up is done within 3 business days.
   1. If any fields are missing or illegible, the service desk will attempt to contact the requestor to confirm the information or send a new form if necessary.
5. Once the account has been set up, the service desk staff will email the user directly with their log-in ID and a temporary password that the user must reset to a private one they choose.
6. Passwords expire every 30 days and must be reset by the user. After 30 days, the user is locked out and must contact the Service Desk for assistance to reset the password and log in.

**User Account Termination**

When a user’s HMIS access is terminated it is the responsibility of the provider to notify the DHS Service Desk within one business day and request that the user’s account be disabled.

# HUD HMIS Data, Technical and Privacy Standards

It is the responsibility of the HMIS Lead Agency that the HMIS is compliant with HUD’s Data, Technical and Privacy standards. This includes:

* Keeping informed of HUD-published changes to its HMIS Data, Technical or Privacy standards
* Working with the designated HMIS software vendor to ensure that it meets HUD’s requirements in a timely manner
* Providing training to users, as needed, regarding changes to the HMIS to in response to HMIS standards changes
* Monitor participating HMIS agencies to ensure their compliance with HUD HMIS standards
* Compliance with the HAB’s HMIS Data Privacy, Security and Data Quality Plans (see Appendices C, D and E).

Participating Agencies (CHOs) are responsible for meeting HUD’s Data, Technical and Privacy standards as directed by the HMIS Lead Agency. This includes:

* Complying with all HMIS Lead agency guidance related to HUD’s HMIS standards
* Modifying operations, as needed, to ensure that the agency is collecting and entering into HMIS all required client information
* Providing training to staff, as needed, to ensure compliance with HUD HMIS standards
* Reporting to the HMIS Lead Agency any violations of HUD HMIS privacy and security standards in a timely manner
* Compliance with the HAB’s HMIS Data Privacy, Security and Data Quality Plans (see Appendices C, D and E).

# HMIS Data Quality

Data quality is critical to the functioning, reporting and compliance of the HMIS. Achieving a high level of data quality includes timeliness, completeness and accuracy. Poor data quality reflects poorly on the participating agency and ultimately on the CoC. HUD establishes HMIS data quality thresholds with which to measure performance for provider organizations and the CoC as a whole. Further, the research and analytic functions of the HMIS Lead Agency on behalf of the CoC and the community are severely hampered by poor data quality. As such, maintaining strong quality is critical. The CoC establishes the following data quality goals:

**Data Entry Timeliness:**

Data entry must be current within one (1) business day for all emergency shelters using HMIS and three (3) business days for all other homeless program types from the actual date of intake, exit, and service provision. Many of the program-specific data elements represent transactions that may change over time. Some data elements will only need to be captured at entry, exit, or on an annual basis, while other elements may need to be updated upon service provision or when a change in income or employment status is necessary to enhance case management services.

**Data Completeness:**

DHS has set a standard of completeness rate of 95% for all Universal Data Elements for Continuum of Care funded homeless projects.

DHS has set a standard of completeness rate of 95% for all Program Specific Data Elements for Continuum of Care funded homeless projects.

DHS has set a standard of completeness rate of 100% for all Project Descriptor Data Elements.

**Data Accuracy:**

All data entered into the Allegheny County HMIS must be a reflection of information provided by the client, as documented by the intake worker or otherwise documented by the client. Data entered into the data base must meet a 100% accuracy rate.

# Appendix A : Minimum Computer/Technology Requirements

Unless otherwise noted in the program/funding source specifications manual, all service providers and vendors shall maintain, at a minimum, the following technological capacities:

Email

Email capabilities and provide DHS with at least one valid email address for contact. This email address must be kept current in the Master Provider Enterprise Repository (MPER).

MPER

PROVIDER shall comply with the requirements of the DHS Master Provider Enterprise Repository (MPER) as more fully put forth in the MPER Specifications Manual, referenced in Exhibit D of the AGREEMENT and incorporated therein.

**Laptop Processor**: Intel Core 2 Duo or higher 2.0 GHz+ (Recommended)

**Desktop Processor**: Intel Core 2 Duo or higher 2.0 GHz + (Recommended)

**Memory**: 3GB+ (Required) 4GB (Recommended)

**Video Card**: Video card must be able to support & sustain screen resolution: 1024x768 32bit colors with a refresh rate of at least 60Hz (Required)

**Monitor**: Any 17” monitor capable of 1024x768 32bit colors with a refresh rate of at least 60Hz (Minimum Requirement) 19” Flat panel or higher, capable of 1024x768 32bit color with a refresh rate of at least 60Hz (Recommended)

**Hard Drive**: 80GB - 160GB (Recommended)

**Media**: CD-RW /DVD or CD-RW/DVD+RW (DVD Minimum Recommended for DVD based training material)

**Laptops**: 802.11 b/g internal or external high speed 3G/4G air card (Recommended for mobile computing)

**Network Adaptor**: Network Ethernet Adaptor 10/100/1000mbps (At least 10/100mbps is required for LAN based access)

**Operating System**: Microsoft Windows XP (Minimum Requirement); Microsoft Windows 7 (Recommended)

**Laptop Warranty**: 3 yr. onsite or direct ship next business day with insurance against drops and spills. (Recommended)

**Desktop Warranty**: 3yr. next business day (Recommended)

**Desktop Software**: Microsoft Office 2003 with Compatibility Pack for Office 2007 (minimum requirement for Word reports) Microsoft Office 2010 (recommended for Word reports) Adobe Acrobat Reader X (minimum requirement for PDF reports) Adobe Flash Player (minimum requirement for accessing online)

**Internet**: High speed Internet connection required for optimum user experience. Dial-up Internet is not recommended or supported

**Special Note**: When purchasing a Laptop or Desktop computer; make sure that the selected equipment is classified as “Business Grade

# Appendix B: User Account Form



# Appendix C: Allegheny County Department of Human Services and Continuum of Care (CoC) Homeless Management System (HMIS) Data Privacy

Overview

This document describes the privacy data plan for the Allegheny County Department of Human Services (DHS) and agencies contributing data to the Allegheny County Continuum of Care (CoC) Homeless Management Information System (HMIS). The plan applies to all CoC employees, contractors, consultants, temporary employees, and other staff members including personnel affiliated with third parties conducting business with the Allegheny County HIPAA Covered Component (ACHCC).

As required by contract, all DHS contracted entities must comply with the privacy rules of the Health Insurance Portability and Accountability Act (HIPAA); therefore, entities within the CoC follow HIPPA in lieu of the 2004 HMIS Privacy and Security Standards as permitted in the 2004 HMIS Data and Technical Standards Final Notice (Federal Register/Vol. 69, No. 146). Under the HIPAA regulations, each entity is responsible for developing policies and procedures to govern the privacy of their clients’ information and the security of that information within their possession and within their own information networks and systems. These standards in many instances mirror those specified in the HMIS Privacy and Security Standards, and in many instance provide additional and stricter safeguards and measures for client confidentiality and security.

Oversight

As the HMIS Lead, the DHS upholds the Information Security and Privacy Governance Program as set forth in the DHS Information Security and Privacy Governance policy. The program goals include but are not limited to the following:

* Information Security (IS) Governance Program with roles and responsibilities, including HIPAA Security and Privacy officers and committee;
* IS Policy Framework with identification of required standards and procedures;
* IS Risk Management Framework with Management, Operational and Technical controls;
* User Access Governance including Identity and Access Management;
* Protection of PHI data, both electronic and non-electronic, entrusted to the County;
* Measures to protect the County entrusted PHI data from unauthorized modification, destruction and disclosure, to maintain the Confidentiality, Integrity and Availability; and
* Maintenance of a securely managed County data infrastructure.

Privacy Details

As specified in CoC contracts with DHS and the privacy and security rules of HIPAA, each agency in the Continuum of Care (CoC) must uphold relevant federal and state confidentiality regulations and laws that protect client records, including those of HIPAA, those governing substance abuse records (42 CFR Part 2, 4 Pa. Code § 255.5), the Commonwealth of Pennsylvania’s regulations governing Mental Health Records (55 Pa. Code Chapter 5100), and all other applicable regulations governing the sharing of sensitive or protected client/patient information.

As covered entities under HIPAA and as contractors of DHS, CoC agencies are required to develop and maintain privacy policies and procedures as directed in the Privacy and Security Rules. In the event that these agencies do not have their own policies governing these areas, the below Allegheny County policies will apply. Please see Table 1 below for a summary of the DHS privacy policies and their purpose.

|  |  |
| --- | --- |
| Privacy Policy | Purpose |
| Anti-Retaliation | The purpose of this policy is to establish that an ACHCC will not take retaliatory action against individuals for exercising rights under HIPAA. |
| Business Associates | The purpose of this policy is to establish that an ACHCC will obtain satisfactory assurances from business associates before disclosing PII to a business associate. |
| Client Authorization | The purpose of this policy is to establish that an ACHCC will obtain client authorization before using or disclosing PII for purposes outside of treatment, payment, and operations. |
| Client Information Disclosure | The purpose of this policy is to address appropriate disclosures of client information for ACHCCs, excepting offices and programs providing Drug and Alcohol Treatment, which are addressed in a separate policy [Drug and Alcohol Disclosures Policy]. |
| Confidential Communications | The purpose of this policy is to establish that a client of an ACHCC may request to receive communications of protected client information by alternative means |
| De-Identified Client Information | The purpose of this policy is to establish that, when appropriate, an ACHCC may remove identifying elements from PII so that the information may be used and disclosed in aggregate for research and/or analysis. |
| Disclosure Accounting | The purpose of this policy is to establish that clients of ACHCCs have the right to receive an accounting of disclosures of PII made by the ACHCC. |
| Disclosure for Drug and Alcohol | This policy addresses the confidentiality of records and information of clients receiving drug and alcohol treatment services. It reflects the preemption of the Health Insurance Portability and Accountability Act by the federal regulations 42 U.S.C. 290ee-3 and 42 U.S.C. 290dd-3. |
| Disclosure for Research | The purpose of this policy is to establish the circumstances under which the ACHCC will release client information for research. |
| Facility Directory | The purpose of this policy is to establish that an ACHCC may maintain a directory of individuals in a given facility. |
| HIPAA Governance | The purpose of this policy is to establish that the roles of Allegheny County and the ACHCCs in HIPAA Privacy and Security Policy development and governance. |
| Individuals Involved in Care | The purpose of this policy is to establish that in certain circumstances an ACHCC may disclose protected client information to individuals involved in the client’s care. |
| Minimum Necessary Disclosure | The purpose of this policy is to establish that an ACHCC will comply with the minimum necessary standard for disclosures of personally identifiable information (PII). |
| Parent Personal Rep Disclosure | The purpose of this policy is to address appropriate disclosures of client information to parents/personal representatives of the client for ACHCCs, excepting offices and programs providing Drug and Alcohol Treatment, which are addressed in a separate policy [Drug and Alcohol Disclosures Policy]. |
| Personnel Designations | The purpose of this policy is to establish that Allegheny County must designate personnel for privacy and security related tasks. |
| Privacy Notice | The purpose of this policy is to outline the requirement that any individual who receives healthcare services directly from a County entity receives a Notice of Privacy Practices. In accordance with §164.520 of HIPAA, clients of ACHCCs and indirectly contracted providers of ACHCCs have a right to adequate notice of the uses and disclosures of their protected health information (PHI), their rights as clients, and the County’s legal duties with respect to protected health information. |
| Privacy Training | The purpose of this policy is to establish that an ACHCC must provide training for its employees on privacy and security. |
| Record Request | The purpose of this policy is to establish that clients of an ACHCC have the right to access, inspect and obtain a copy of their own records, with limited exceptions. |
| Right to Amend | The purpose of this policy is to establish that a client of an ACHCC has the right to request amendments to his or her own records. |
| Right to Restrict | The purpose of this policy is to establish that clients of an ACHCC have the right to restrict the ways in which the ACHCC may use their personally identifiable information (PII). |

# Appendix D: Allegheny County Department of Human Services and Continuum of Care (CoC) Homeless Management System (HMIS) Security

Overview

This document describes the Security plan for the Allegheny County Department of Human Services (DHS) and agencies contributing data to the Allegheny County Continuum of Care (CoC) Homeless Management Information System (HMIS). The plan applies to all CoC employees, contractors, consultants, temporary employees, and other staff members including personnel affiliated with third parties conducting business with the Allegheny County HIPAA Covered Component (ACHCC).

As required by contract, all DHS contracted entities must comply with the privacy rules of the Health Insurance Portability and Accountability Act (HIPAA); therefore, entities within the CoC follow HIPPA in lieu of the 2004 HMIS Privacy and Security Standards as permitted in the 2004 HMIS Data and Technical Standards Final Notice (Federal Register/Vol. 69, No. 146). Under the HIPAA regulations, each entity is responsible for developing policies and procedures to govern the privacy of their clients’ information and the security of that information within their possession and within their own information networks and systems. These standards in many instances mirror those specified in the HMIS Privacy and Security Standards, and in many instance provide additional and stricter safeguards and measures for client confidentiality and security.

Oversight

As the HMIS Lead, the DHS upholds the Information Security and Privacy Governance Program as set forth in the DHS Information Security and Privacy Governance policy. The program goals include but are not limited to the following:

* Information Security (IS) Governance Program with roles and responsibilities, including HIPAA Security and Privacy officers and committee;
* IS Policy Framework with identification of required standards and procedures;
* IS Risk Management Framework with Management, Operational and Technical controls;
* User Access Governance including Identity and Access Management;
* Protection of PHI data, both electronic and non-electronic, entrusted to the County;
* Measures to protect the County entrusted PHI data from unauthorized modification, destruction and disclosure, to maintain the Confidentiality, Integrity and Availability; and
* Maintenance of a securely managed County data infrastructure.

Security Details

The purpose of security standards is to protect against reasonably anticipated threats and hazards that compromise the HMIS system, data confidentiality and integrity.

As the HMIS lead agency, the Allegheny County Department of Human Services (DHS) developed and maintains the CoC’s HMIS system. The attached policies and procedures govern the privacy and security of information contained within it, as well as all protected client information within the Department.

As covered entities under HIPAA and as contractors of DHS, CoC agencies are required to develop and maintain security policies and procedures as directed in the Privacy and Security Rules. These policies would govern their use of the HMIS system and any practices that involve client information from HMIS or obtained through their daily practices. In the event that these agencies do not have their own policies governing these areas, the below Allegheny County policies will apply. Please see Table 2 below for a summary of DHS security policies and their purpose.

|  |  |
| --- | --- |
| Security Policy | Purpose |
| Acceptable Use | The purpose of this policy is to outline the acceptable use of County IT resources in protecting the users and the County. Inappropriate use exposes the County to risks including virus attacks, compromise of network systems and services, and legal issues. |
| Access Control | The purpose of this policy is to convey that access to County information, information resources, and information systems is controlled and provided only for authorized users on a need-to-know basis. |
| Desktop and Laptop Security | The purpose of this policy is to establish a framework for managing and safeguarding County’s computing systems and confidential information stored in them. |
| Information Security Privacy and Governance | The purpose of this policy is to establish a governance framework to assist senior leadership to oversee and support the development and implementation of an effective information system (IS) and privacy program. |
| Information Security Risk Management | The purpose of this policy is to help articulate required program components and a systematic approach to risk management. This program will aid the County in identifying and quantifying risks, mitigating risks to an acceptable level, and for continually assessing and evaluating risks. |
| IT Asset Management | The purpose of this policy is to help articulate required program components and a systematic approach to risk management. This program will aid the County in identifying and quantifying risks, mitigating risks to an acceptable level, and for continually assessing and evaluating risks. |
| IT Disaster Recovery | The purpose of this policy is to establish requirements for availability and accessibility of County’s data in the event of an emergency or other occurrence that disrupts critical business operations at County. The IT Disaster Recovery policy forms the foundational block for entity’s disaster recovery program and will help establish and maintain an enterprise wide contingency plan for responding to emergencies that causes damage to functioning of information systems. |
| Mobile Device Security | The purpose of this policy is to help establish requirements for secure use of mobile devices in protecting sensitive data while addressing the overall IS risks. |
| Network Security | The purpose of this policy is to establish requirements for protecting PHI data in transit for the information systems of the covered components of the County. The requirements include compartmentalizing security functionalities, maintaining the confidentiality, integrity, and availability of transmitted data, and utilizing trusted sources to establish communication channels. |
| Physical and Environment Security | The purpose of this policy is to safeguard County PHI hosted facilities and equipment therein from unauthorized physical access, tampering, theft, loss and damage. The policy forms the foundational block for County’s physical security program and addresses but is not limited to environmental threats (hurricanes, tornadoes, fires etc.), human threats (intruders, vandalism, employee mistakes etc.) and supply system threats (interruption to water, electricity supplies etc.). |
| SDLC (Software Development Life Cycle) Security | The purpose this policy is to establish secure practices in the development of software that will be used to access, collect, store, process or transmit County data. |
| Security Awareness and Training Management | The purpose of this policy is to establish the required controls for determining that entity affiliated personnel understand their responsibility and to reduce the risk of theft, fraud or misuse of information assets. |
| Security Incident Management | The purpose of this policy is to establish requirements for consistent and effective approach to the management of IS incidents so that corrective actions are taken in a timely manner, while continuously learning from the process of improvement. The terms “security incident” or “incident” are used interchangeably in this policy document. |
| Third Party Risk Management | The purpose of this policy is to provide guidance for identifying, evaluating, and managing IS risks posed through provider services to County while receiving, maintaining, processing or accessing County data. The IS context of the policy will include risk management, access control, and service management. |
| Threat and Vulnerability Management | The purpose of this policy is to establish guideline to secure the data and IT infrastructure components against configuration vulnerabilities and evolving IS threats. |

# Appendix E: HMIS Data Quality Plan

Purpose

This document describes the data quality plan for the Allegheny County Department of Human Services (ACDHS) and agencies contributing data (HMIS Participating Agencies) to the Allegheny County Continuum of Care Homeless Management Information System (HMIS). The plan applies to Allegheny County HIPAA Covered Component (ACHCC) PHI data that is stored, used, processed and/or transmitted by HMIS. This is applicable to ACHCC employees, contractors, consultants, temporary employees, and other staff members including personnel affiliated with third parties conducting business with the ACHCC.

Privacy

Data Collection Notice

All Agencies are required to have the data collection notice posted and visible to clients where information is collected and must include the notice in provider and client agreements. All agencies must use the Allegheny County CoC Data Collection notice.

HMIS Data Quality Plan

HMIS data quality is based on the extent the information recorded in an HMIS accurately portrays valid and true information. To assist the federal government, the state Department of Human Services, and the Allegheny County Department of Human Services (ACDHS) in better understanding and being able to present accurate and consistent information on people experiencing homelessness in Allegheny County, it is critical that the HMIS best represent the reality of this population and the programs that serve them. The following data collection and data entry standards are best practices that the Allegheny County Department of Human Services will ask its provider agencies to implement when entering data into HMIS. These standards will ensure that data are entered in a timely and consistent fashion across different programs. These standards were developed through a thorough examination of standards across the country and in accordance with guidance given by the US Department of Housing and Urban Development (HUD). They have been reviewed by the senior staff at the Allegheny County Department of Human Services and adopted by the Allegheny County Homeless Advisory Board.

This document describes the Homeless Management Information System (HMIS) data quality plan for the Allegheny County Continuum of Care (CoC). This document includes data quality standards and expectations, as well as data quality components and protocols for ongoing data quality monitoring which meet requirements set forth by HUD. This HMIS Data Quality Plan shall be updated annually, and shall include the latest HMIS data standards set by HUD and the Allegheny County CoC.

***1. HMIS Data and Technical Standards***

HMIS is a locally administered electronic data collection tool used to collect ongoing longitudinal data on homeless families and individuals at risk of homelessness who receive assistance from community homeless and other human services providers. The longitudinal data collected can be used to increase the community’s understanding of the size, characteristics and needs of the population for grant writing, for program/system-wide performance evaluation, to advance effective fact-based funding and legislative decision making and to ensure that clients are served efficiently and effectively. In July 2003, HUD published a draft notice of the HMIS Technical Data Standards. In July 2004, HUD finalized and published the HMIS Technical Data Standards in the Federal Register. HUD’s objective was to encourage communities around the nation to set up an HMIS. The notice specified which data elements should be collected in order to ensure consistency across the nation and established minimum baseline policies and procedures for privacy, confidentiality and security standards designed to protect client level data.

In 2005, the Annual Homeless Assessment Report (AHAR) reporting process was established. This process identified the procedures to collect/report HMIS data to Congress to be used for federal appropriation decisions. HUD also stated that collecting HMIS data would earn points for the CoC in the Super NOFA grant application ratings. The vision was that as communities participated in HMIS, more accurate information would be collected. This information would be more reflective of the plight of the homeless and at risk population and nationally, a better understanding would result. In 2010, HUD amended the HMIS Technical Data Standards. HMIS is the de-facto database for homeless and at- risk data collection efforts; as the standards continue to evolve they will produce data that can positively impact funding, polices, and decisions that solve the problem of homelessness in the United States and in Allegheny County.

***2. Definition of Data Quality***

HMIS data quality refers to the extent to which data recorded in the Allegheny County HMIS accurately reflects the same information in the real world. A perfect overlap between data and reality would result in a hypothetical data quality rating of 100 percent, while a data quality rating of 0 percent would indicate that there is no match between the information entered into an HMIS and reality. No data collection system has a quality rating of 100%. However, to meet the Allegheny County CoC’s goal of presenting accurate and consistent information on homelessness, it is critical that the HMIS best possibly represent reality as it relates to people who are homeless and the programs that serve them. *Specifically, the goal is to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent of homelessness and the impact of homeless services.*

***3. Data Quality Plan***

A data quality plan is a community-level document that facilitates the ability of the CoC to achieve statistically valid and reliable data. The data quality plan’s purpose is to standardize and communicate expectations, and to provide guidance and support for all participating agencies. A data quality plan is generally developed by the Continuum of Care and the HMIS Lead Agency with input from community stakeholders and is formally adopted by the CoC. In short, a data quality plan sets expectations for agencies that use HMIS to capture reliable and valid data on persons accessing the homeless assistance system.

***4. Homeless Management Information System (HMIS)***

For the purposes of this document, the Homeless Management Information System (HMIS) refers to the Allegheny County Department of Human Services HMIS software application and all modules, project descriptor data elements, waiting lists (bulletin boards), individual and family assessments (including entry, update, and exit assessments for each client), and reporting capacities contained therein.

***5. All Clients Served***

The purpose of All Clients Served is to ensure that all of the clients that are being served by providers within the Allegheny County CoC are represented in the HMIS (except those that are being served by domestic violence or intimate partner violence programs).

**STANDARD OF PRACTICE**: All clients served by all CoC programs will be entered into the HMIS. Assessments must be fully completed for each client and all clients must be run through the Master Client Index at the time of record creation. Each program type will have its own mandatory and optional questions and all mandatory questions must be answered in order for an assessment to be considered complete.

***6. Timeliness and Frequency of Data Entry***

Entering data in a timely manner can reduce human error that occurs when too much time has elapsed between the service transaction and the data entry. The individual doing the data entry has to rely on handwritten notes or their own recall of a case management session, a service transaction, or a program exit date; therefore, the sooner the data is entered, the better the chance the data will be correct. Timely data entry also ensures that the data is accessible when it is needed, either proactively (for monitoring purposes, increasing awareness, or meeting funding requirements), or reactively (in response to requests for information, or to respond to inaccurate information). The Allegheny County CoC also relies heavily on accurate and real time information about participants in programs to manage its Coordinated Entry process, so timely data entry is essential for this process to work properly.

**STANDARD OF PRACTICE:** Data entry must be current within one (1) business day for all emergency shelters using HMIS and three (3) business days for all other homeless program types from the actual date of intake, exit, and service provision. Many of the program-specific data elements represent transactions that may change over time. Some data elements will only need to be captured at entry, exit, or on an annual basis, while other elements may need to be updated upon service provision or when a change in income or employment status is necessary to enhance case management services.

***7. Data Completeness***

Data completeness is defined as the percentage of data elements that have been answered for that element, not including “Null/Missing” and “Unknown” and “Client Refused” responses. Percentages will be calculated on the number of Null, Missing, Unknown, and Client Refused responses divided by the number of total responses for that data element for each program in HMIS.

**STANDARD OF PRACTICE:**  **Universal Data Elements Data Completeness**

The purpose of the Universal Data Elements is to ensure that all homeless service providers in the Allegheny County CoC are documenting the data elements necessary to produce a Continuum-wide unduplicated count of clients served, to provide accurate counts for various reporting requirements, and to ensure that the CoC has sufficient client data to conduct basic analysis on the extent and characteristics of the populations they serve.

DHS has set a **standard** **of completeness rate** of 95% for all Universal Data Elements for Continuum of Care funded homeless projects. Programs must work toward ensuring that 95% of all required data elements for each client served are collected and entered correctly into the HMIS. Data collected and entered need to be as complete as possible. DHS will monitor each project’s ability to collect and enter all required information on all people being served within each household during the time period the household is enrolled in the project. Achieving adequate HMIS coverage is essential to ensuring that the records are representative of all the clients being served. Missing individual records may result in the inability to determine whether or not the characteristics of those served are significantly different than those that are included. A significant number of missing records may result in aggregate reports inaccurately reflecting the homeless population being served and may lead to reduced funding for the CoC. As a result, DHS will use data quality as a benchmark when ranking individual projects that are requesting renewed grant funding.

**STANDARD OF PRACTICE: Program Specific Data Elements Data Completeness**

The purpose of the Program Specific Data Elements is to ensure that all HMIS participating recipients are documenting the data elements required by the specific funding that supports that project and to ensure that the CoC has sufficient client data to conduct analysis on the extent and characteristics of the populations they serve.

DHS has set a **standard** **of completeness rate** of 95% for all Program Specific Data Elements for Continuum of Care funded homeless projects. Programs must work toward ensuring that 95% of all required data elements for each client served are collected and entered correctly into the HMIS. Data collected and entered need to be as complete as possible. DHS will monitor each project’s ability to collect and enter all required information on all people being served within each household during the time period the household is enrolled in the project. Achieving adequate HMIS coverage is essential to ensuring that the records are representative of all the clients being served. Missing individual records may result in the inability to determine whether or not the characteristics of those served are significantly different than those that are included. A significant number of missing records may result in aggregate reports not accurately reflecting the homeless population being served and may lead to reduced funding for the CoC. As a result, DHS will use data quality as a benchmark when ranking individual projects that are requesting renewed grant funding.

**STANDARD OF PRACTICE: Project Descriptor Data Elements**

Project Descriptor Data Elements constitute the basic information about projects that use the HMIS to store information about clients that they serve. Project Descriptor Elements also form the basis of referrals to programs from the Allegheny County Department of Human Services Coordinated Entry Center. As a result, Project Descriptor Data Elements will be entered on behalf of the program by the DHS, Bureau of Homeless Services (BHS) and will be stored in both the HMIS system and the county’s Master Provider Enterprise Repository (MPER) system. Data will be transferred from the MPER system to the HMIS system when changes are made by the provider for items such as personnel, corporate address changes, and other data elements that are editable in MPER. However, data about the number of beds/units in the project, data used to run the “algorithm” that matches homeless clients to programs through Coordinated Entry, and other data crucial for accurate reporting will be entered and maintained by the BHS staff. Changes that need to be made to this data must be requested by the provider, in writing, to the Bureau of Homeless Services.

**Because this is information is required as part of basic administrative set up of programs within the HMIS system, a standard of *completeness rate of 100% for data entry is required* for Project Descriptor Data Elements.**

***8. Data Accuracy and Consistency***

Data Accuracy is defined as the correlation between actual characteristics of the homeless population in Allegheny County versus the data represented in the HMIS system. Accuracy of data in an HMIS can be difficult to assess. It depends on the client’s ability to provide the correct data and the intake worker’s ability to document and enter the data accurately.

Data Consistency is defined as the common interpretation of questions and answers in HMIS and the degree to which those questions and answers need to be completed. Consistency directly affects the accuracy of data; if an end user collects all of the data, but it is not collected in a consistent manner, then the data may not be accurate. Accuracy will be assessed based on the monitoring activities outlined in the Data Quality Plan. Information entered into the HMIS needs to be valid, i.e., it needs to accurately represent information on the people that enter any of the homeless service programs contributing data to the HMIS. Inaccurate data may be intentional or unintentional. In general, false or inaccurate information is worse than incomplete information, since with the latter, it is at least possible to acknowledge the gap. Thus, it should be emphasized to clients and staff that it is better to enter nothing (or preferably “don’t know” or “refused”) than to enter inaccurate information. To ensure the most up-to-date and complete data, data entry errors should be corrected as they are detected.

**Standard of Practice:** All data entered into the Allegheny County HMIS must be a reflection of information provided by the client, as documented by the intake worker or otherwise documented by the client. Data entered into the data base must meet a *100% accuracy rate*. Recording inaccurate information is strictly prohibited, unless in cases when a client refuses to provide correct personal information. Data consistency will ensure that data is understood, collected, and entered consistently across all programs in the HMIS. Consistency directly affects the accuracy of data; if an end user collects all of the data, but it is collected in a consistent manner, then the data may not be accurate. All data in HMIS shall be collected and entered in a common and consistent manner across all programs. To that end, all intake and data entry workers will complete an initial training before accessing the live HMIS system. CoC funded programs are required to collect and enter all the Universal, most of the Program Specific, and some of the Optional Program Specific Data Elements in HMIS. Consistency will be reinforced by the CoC through required and optional trainings conducted by DHS and through the HMIS Manual

Erroneous data can be a result of either deliberately providing or entering false data or accidental data entry errors resulting from activities like misspellings or inadvertently selecting the wrong response from dropdowns. Users must attend training to learn about the benefits of HMIS. In this training, users will be trained to understand the intent of each question to ensure that the data being collected is not based on a misunderstanding of the question. Where possible, asking clients to review data and providing opportunities to correct personal information after it has been entered can improve data accuracy.

***9. Monitoring***

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

The purpose of monitoring is to ensure that the standards on the extent and quality of data entered into the HMIS are met to the greatest possible extent and that data quality issues are quickly identified and resolved. The following section outlines how HMIS data quality will be monitored, including adherence to the data quality standards referenced above.

***10. Roles and Responsibilities***

HMIS Users: Enter quality data following the relevant workflow issued at HMIS trainings, and adhere to data quality standards outlined in the previous section of this document.

Provider Administrators and Directors with HMIS access: Each provider's Executive Director has the option to designate an agency representative to act as their HMIS Administrator. If the provider chooses not to designate an HMIS Administrator, it is the responsibility of the Executive Director to ensure compliance with the policies and procedures of this manual. Providers are ultimately responsible for the quality of their data. If agencies abide by the policies and procedures outlined in this manual and monitor the integrity and security of client data, it will ensure that they perform well in an audit. Providers will be held responsible for the security of their client’s data and will be held accountable for the liability for any misuse of the software by agency staff.

In addition to the responsibilities assigned to HMIS Users, provider administrators may run all required reports monthly and compare the results to the data quality standards.

Bureau of Homeless Services HMIS Staff: Train users on how to correctly enter data into HMIS and how to run reports as necessary, support current users, create and maintain documentation, keeping users informed about any changes, maintain provider data, assist in submitting reports to HUD, and monitor and report on data quality.

***11. Compliance***

If the provider fails to make corrections when BHS HMIS staff has informed them of needed corrective action, or if there are repeated or serious data quality errors, the Bureau of Homeless Services will notify the agency’s Program Director and Executive Director about non-compliance with the required HMIS participation.

Non-compliance with the standards laid out in this document may result in the grantee being placed on a Corrective Action Plan. Ongoing non-compliance after being placed on a Corrective Action Plan could result in loss of federal or state funding. Moreover, several funding sources now consider HMIS data quality when making funding decisions, including HUD’s CoC Program. Low HMIS data quality performance may result in denial or reductions of this funding.

***12. Agreement***

The purpose of agreement is to ensure that all participants in the Allegheny County Continuum of Care (CoC) HMIS are aware and have agreed to the Allegheny County CoC Data Quality Standards.

**Upon adoption of these data quality standards, all HMIS participants will be required to sign an agreement stating they will to the best of their ability achieve the quality standards.**

#### Standard Client Acknowledgement of HMIS Data Collection Form

Participation in data collection is a critical component of the Allegheny County Continuum of Care’s ability to provide the most effective services and housing possible.

This client notice and consent describes how information about you may be used and disclosed and how you can get access to this information. Please review it carefully. If you have any questions or desire any further information regarding this form please contact \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (insert client’s name), understand and acknowledge that

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (the “Agency”) is affiliated with the HMIS, and I consent to and authorize the collection of information and preparation of records pertaining to the services provided to me by the Agency.

\_\_\_\_\_\_ (please initial) I understand and acknowledge the following collection of information:

\_\_\_\_\_\_ Identifying information (Name, birth date, gender, race, social security number, residential information, phone number, family information.)

\_\_\_\_\_\_ Medical records (except HIV/AIDS and alcohol and drug treatment), Psychological records and evaluations, vocational assessment, care coordinators recommendations and direct observations, employment status, etc.

\_\_\_\_\_\_ Financial information (income verification, public assistance payments and allowances, food stamp allotments.)

\_\_\_\_\_\_ HIV/AIDS diagnosis

\_\_\_\_\_\_ Substance abuse diagnoses, treatment plan, progress in treatment, discharge.

\_\_\_\_\_\_ For the specific purpose of: \_\_\_\_\_\_ further care \_\_\_\_\_\_ evaluation

\_\_\_\_\_\_other (please specify other) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_(please initial) I understand that I have the right to inspect, copy, and request all records maintained by the Agency relating to the provision of services to me and to receive copy of those records

\_\_\_\_\_\_(please initial) I understand that this release can be revoked by me at any time and that the revocation must be signed and dated by me. I further understand that this consent is subject to revocation at any time, except to the extent that the Agency has already taken action in reliance on it. If not previously revoked, this consent terminates automatically 180 days after my last treatment or discharge from Agency.

I understand that my records are protected by federal, state, and local regulations governing confidentiality of client records and cannot be disclosed without my written consent unless otherwise provided for in the regulations.

Additionally, I understand that participation in data collection is optional, and I am able to access shelter and housing services if I choose not to participate in data collection.

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_