Homeless Management Information System (HMIS)
Policies and Procedures System Manual

SAN BERNARDINO
COUNTY

Office of Homeless Services (OHS)

Homeless Management Information System (HMIS) Policies and Procedures System Manual

Table of Contents

Overview

Introduction　　This system manual provides policies and procedures for the Homeless Management Information System (HMIS) used by the San Bernardino County Continuum of Care (CoC) to manage data about the use of homeless services.

Terms and acronyms　　Below is a list of terms and acronyms commonly used in this manual:

Acronym	Term
AESHMIS	Adaptive Enterprise Solution Homeless Management Information System
AIDS	Acquired Immunodeficiency Syndrome
APR	Annual Performance Report
ASP	Application Service Provider
BCP	Basic Center Program
CoC	Continuum of Care
CFR	Code of Federal Regulations
DSL	Digital Subscriber Line
ESG	Emergency Solutions Grant
HHS	United States Department of Health and Human Services
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immunodeficiency Syndrome
HMIS	Homeless Management Information System
HPN	Homeless Provider Network
HOPWA	Housing Opportunities for People with AIDS
HUD	United States Department of Housing and Urban Development
IP	Internet Protocol
ISP	Internet Service Provider
LAN	Local Area Network
Mod	Moderate
MOU	Memorandum of Understanding
NAT	Network Address Translation
OHS	Office of Homeless Services
OS	Operating System
PATH	Projects for Assistance in Transition from Homelessness
PC	Personal Computer
PDDEs	Project Descriptor Data Elements
PKI	Public Key Infrastructure
PII	Personally Identifiable Information
PPI	Protected Personal Information
QPR	Quarterly Performance Reports
RHY	Runaway and Homeless Youth
SAMHSA	Substance Abuse and Mental Health Services Administration
SBC CoC	San Bernardino County Continuum of Care
SBCHP	San Bernardino County Homeless Partnership
SHP	Supportive Housing Program
SNAPS	Special Needs Assistance Programs

Overview, Continued

Acronym	Term
SOAR	SSI/SSDI Outreach, Access, and Recovery
SRO	Single Room Occupancy
SSN	Social Security Number
TCP/IP	Transmission Control Protocol/Internet Protocol
UPS	Uninterruptible Power Supply
VA	United States Department of Veterans Affairs
VPN	Virtual Private Network
WAN	Wide Area Network
WEP	Wired Equivalent Privacy
Wi-Fi	Wireless Fidelity
WLAN	Wireless Local Area Network

Definitions

Introduction	This section provides definitions for terms used throughout this system manual.
AESHMIS	The Adaptive Enterprise Solution Homeless Management Information System (AESHMIS) software package, provided by the vendor, has been implemented as San Bernardino County Continuum of Care (SBC CoC) Homeless Management Information System (HMIS) software.
Agency administrator	An agency administrator is the person responsible for system administration at the agency level. His/her responsibilities include: • Informing HMIS System Administration of the need to add and delete users, and • Basic troubleshooting.
Agency executive management	The agency executive management is the high-level management staff responsible for organization level decision making (e.g., the agency President or Executive Director).
Aggregate data	Aggregate data is the data with identifying elements removed and concentrated at a central server. Aggregate data is used for analytical purposes and reporting.
Anti-virus software	An anti-virus software is a program used to detect and remove computer viruses. The anti-virus software should always include a regular update services allowing it to keep up with the latest viruses as they are released.
Application Service Provider (ASP)	An ASP is a third-party entity that manages and distributes software-based services to customers across a wide area network.
Audit trail	An audit trail is a history of all access to the system, including viewing additions and updates made to a client record.
Authentication	Authentication is the process of identifying a user to grant access to a system or resource, which is usually based on a username and password.
Cable	Cable is a type of modem that allows people to access the internet via their cable television service.

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Definitions, Continued

Central intake level data

Central intake level data is client information collected at intake, including the following system screens:

- Client intake,
- Household/demographics,
- Referral,
- Eligibility,
- Education/employment, and
- Documents.

Client

A client is the person receiving services whose information is entered into SBC CoC HMIS.

Client identifiable information

Client identifiable information is any information that is specific to the individual such as:

- Social Security Number (SSN),
- Date of birth,
- Address,
- Zip code,
- Gender,
- Ethnicity, and
- Race.

Code of Federal Regulations (CFR)

The CFR is a codification of the general and permanent rules published in the federal register by the departments and agencies of the Federal Government. It is divided into 50 titles that represent broad areas subject to Federal regulation. The 50 subject matter titles contain one or more individual volumes, which are updated once each calendar year, on a staggered basis.

Continuum of Care (CoC) and Continuum

The CoC and Continuum refers to the group organized to carry out the responsibilities required under the CoC Program Interim Rule (24 CFR Part 578) and comprises representatives of organizations, including:

- Nonprofit homeless assistance 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,

Continued on next page

Continuum of Care (CoC) and Continuum, continued	- Law enforcement, and - Organizations that serve people who have previously and are currently experiencing homelessness to the extent that these groups are represented within the geographic area and are available to participate.
CoC Program	The CoC Program refers to the United States (U.S). Department of Housing and Urban Development (HUD) funding source which provides housing and/or service grant dollars.
Continuum project	A Continuum project refers to a distinct unit of an organization, which may or may not be funded by HUD or the Federal partners, whose primary purpose is to provide services and/or lodging for individuals and families experiencing homelessness or at-risk of experiencing homelessness and is identified by the Continuum as part of its service system. For example, a project funded by the HUD's CoC Program may be referred to as a "CoC Program-funded continuum project".
Database	A database is an electronic system for organizing data so it can easily be searched and retrieved. The data within SBC CoC HMIS is accessible through a web-based interface.
Decryption	Decryption is the conversion of scrambled text back into understandable, plain text form. Decryption uses an algorithm that reverses the process used during encryption.
Dedicated IP	Dedicated Internet Protocol (IP) is a reserve IP (see the definition for IP).
Digital certificate	A digital certificate is an attachment to a message or data that verifies the identity of a sender.
DSL	A Digital Subscriber Line (DSL) is a digital telecommunications protocol designed to allow high-speed data communication over the existing copper telephone lines.
Emergency shelter	An emergency shelter is any facility with the primary purpose to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Any project funded as an emergency shelter under a Fiscal Year 2010 Emergency Solutions Grant (ESG) may continue to be funded under ESG.

Emergency Solutions Grant (ESG)	The ESG provides grant funding to: • Engage homeless individuals and families living on the street, • Rapidly re-house homeless individuals and families, • Help operate and provide essential services in emergency shelters for homeless individuals and families, and • Prevent individuals and families from becoming homeless.
Encryption	Encryption is conversion of plain text into encrypted data by scrambling it using a code that masks the meaning of the data to any unauthorized viewer. Encrypted data is not readable unless it is converted back into plan text via decryption.
Firewall	Firewall is a method of controlling access to a private network to provide security of data. Firewalls can use software, hardware, or a combination of both to control access.
HMIS	HMIS is a generic term for any system used to manage data about the use of homeless services. It is the information system designated by the CoC to: • Comply with HUD's data collection, management, and reporting standards and • Collect client-level data and data regarding the provision of housing and services to homeless individuals and families and persons at-risk of homelessness. HMIS is the use of a comparable database by a victim services provider or legal services provider that is permitted by HUD under 24 CFR 576.

HMIS advisory committee	An HMIS advisory committee is composed of representatives from city and county departments, community/faith based organizations, non-profit entities and other members of the public/private sectors. The committee is responsible for the following, in the implementation of SBC CoC HMIS:
	
	 • Developing:
	    – Best practices,
	    – Policies and procedures, and
	 • Providing guidance.

HMIS end user	An HMIS is an individual who enters or uses data in an HMIS or a comparable database approved by the CoC.

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Definitions, Continued

HMIS end user group	An HMIS end-user group is made up of HMIS end-users from agencies throughout the CoC. The group's main purpose is to perform the following: • Provide: – Input on system issues, and – Mutual support among users. • Share best practices, and • Address challenges as a team. In addition, the end user's group will address effective ways to help advanced users to maximize system functionality and effective use of data.
HMIS lead	An HMIS lead is the entity designated by the CoC in accordance with CoC Interim Rule (24 CFR Part 578) to operate the Continuum's HMIS on the Continuum's behalf.
HMIS system administrator	The HMIS system administrator is the individual(s) whose job is to: • Manage the HMIS implementation at the local level, • Provide agency access to HMIS, • Manage appropriate use, • Support users through connection to, or direct provision of, user training, and • Oversee system setup.
HMIS vendor	An HMIS vendor is a contractor who provides materials or services for the operation of an HMIS. An HMIS vendor includes an HMIS: • Software provider, • Web server host, or • Data warehouse provider.
Host	A host is a computer system or organization that plays a central role providing data storage and/or application services for SBC CoC HMIS.
Homeless	Homeless is defined as the following: • An individual or family who lacks a fixed, regular, and adequate nighttime residence, including: – With a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, such as a/an: ✓ Car, ✓ Park, ✓ Abandoned building, ✓ Bus or train station, ✓ Airport, or ✓ Camping ground,

Definitions, Continued

Homeless,
continued

- – Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements, such as:
  - ✓ Congregate shelters,
  - ✓ Transitional housing, and
  - ✓ Hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals), or
  - – Who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution,
- An individual or family who will imminently lose their primary nighttime residence, provided that:
  - – The:
    - ✓ Primary nighttime residence will be lost within 14 days of the date of application for homeless assistance,
    - ✓ Individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing, and
  - – No subsequent residence has been identified,
- Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless as defined, but who:
  - – Are defined as homeless under Section:
    - ✓ 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a),
    - ✓ 637 of the Head Start Act (42 U.S.C. 9832),
    - ✓ 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2),
    - ✓ 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)),
    - ✓ 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012),
    - ✓ 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or
    - ✓ 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a),
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance,
  - – Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance, and
  - – Can be expected to continue in such status for an extended period of time because of:
    - ✓ Chronic disabilities, physical, or mental conditions,
    - ✓ Substance addiction,
    - ✓ Histories of domestic violence or childhood abuse (including neglect),
    - ✓ The presence of a child or youth with a disability, or
    - ✓ Two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment, or

Definitions, Continued

Homeless, continued

- Any individual or family who:
    - Is fleeing, or is attempting to flee:
        - ✓ Domestic or dating violence,
        - ✓ Sexual assault,
        - ✓ Stalking, or
        - ✓ Other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence,
    - Has no other residence, and
    - Lacks the resources or support networks to obtain other permanent housing, such as:
        - ✓ Family,
        - ✓ Friends, and
        - ✓ Faith-based or other social networks.

Internet

The internet is a set of interconnected networks that form the basis for the World Wide Web.

IP address

IP address is a unique address assigned to a user's connection based on the TCP/IP network. The internet address is usually expressed in dot notation, e.g., 128.121.4.5.

Internet Service Provider (ISP)

ISP is a company that provides individuals or organization with access to the internet.

Local Area Network (LAN)

A LAN is a network that is geographically limited, allowing easy interconnection of computers within offices or buildings.

Network

The network are several computers connected to each other.

Network Address Translation (NAT)

A NAT is the translation of an IP address used within one network to a different IP address known within another network. One network is designated the inside network and the other is the outside. Typically, a company maps its local inside network addresses to one or more global outside IP addresses and un-maps the global IP addresses on incoming packets back into local IP addresses. This helps ensure security since each outgoing or incoming request must go through a translation process that also offers the opportunity to qualify or authenticate the request or match it to a previous request. NAT also conserves on the number of global IP addresses that a company needs and lets the company use a single IP address in its communication with the world.

Definitions, Continued

Non-profit organization

A non-profit organization is an organization with:

- No part of the net earnings inuring to the benefit of any of the following:
    - Member,
    - Founder,
    - Contributor, or
    - Individual,
- A:
    - Voluntary board, and
    - Functioning accounting system that is operated in accordance with generally accepted accounting principles or has designated a fiscal agent that will maintain a functioning accounting system for the organization in accordance with generally accepted accounting principles, and
- Practices nondiscrimination in the provision of assistance.

A private non-profit organization does not include governmental organizations, such as public housing agencies.

On-site

On-site is the location that uses SBC CoC HMIS and provides services to at-risk and homeless clients.

Outcome/ program manager

An outcome/program manager is the person at each participating agency designated to develop and assess the use of outcome measures for the agency's data on SBC CoC HMIS.

Participating agency

A participating agency is an agency, organization or group who has signed a HMIS agency Memorandum of Understanding (MOU) that allowed access to SBC CoC HMIS.

Permanent housing

Permanent housing is a structure or set of structures with subsidized or unsubsidized rental housing units subject to applicable landlord-tenant law, with no limit on length of stay and no requirement to participate in supportive services as a condition of access to or continued occupancy in the housing. "Permanent housing" includes permanent supportive housing.

Permanent supportive housing

Permanent supportive housing is permanent housing with no limit on the length of stay that is occupied by the target population and is linked to onsite or offsite services that assist the supportive housing residents in:

- Retaining the housing,
- Improving his or her health status, and
- Maximizing his or her ability to live and, when possible, work in the community.

"Permanent supportive housing" includes associated facilities if used to provide services to housing residents.

Definitions, Continued

Program	For purposes of data collection in HMIS, a program refers to the federal funding source, such as: • HUD CoC, • U.S. Department of Health and Human Services (HHS) Projects for Assistance in Transition from Homelessness (PATH), or • U.S. Department of Veterans Affairs (VA) Supportive Services • for Veteran Families (SSVF).
Program level data	Program level data is client information collected during the course of the client's program enrollment, including the following system screens: • Program entry, • Services provided, • Client Profile, • Case notes, • Track savings, • Bed assignments, • Bed maintenance, • Daily services, • Sessions, and • Program exit.
Project	For purposes of data collection in HMIS, a project refers to a distinct unit of an organization as set up in the HMIS (e.g., Rapid Re-Housing).
Real-time data	Real-time data is data that is processed and available to other users as it is entered into the system.
Referral agency	A referral agency is any agency that provides services to the homeless by referring clients to service agencies throughout San Bernardino County.
San Bernardino County (SBC) CoC HMIS	SBC CoC HMIS is a web-based information system that homeless service agencies within the San Bernardino region use to capture information about the persons they served.
Server	A server is a computer that provides a service for other computers connected to it via a network. Servers can host and send files, data, or programs to client computers.
Static IP address	A static IP address is a reserve IP (see definition for Dedicated IP).
T1 line	T1 line is a communication line that can carry voice or data at transmission speeds that are 25 times the speed of a modem.

Definitions, Continued

TCP/IP	TCP/IP is the protocol that enables two or more computers to establish a connection via the internet.
HUD	HUD is one of the executive departments of the U.S. federal government. It administers federal housing and urban development laws.
User ID	User Identification (ID) is the unique identifier assigned to an authorized HMIS end-user.
Virtual Private Network (VPN)	VPN is a group of computer systems that communicate securely over a public network.

Wide Area Network (WAN)	WAN is a network that is:
	
	• Not geographically limited, and
	• Can:
	    – Link computers in different locales, and
	    – Extend requests for web pages.

Wired Equivalent Privacy (WEP)	WEP is a security protocol, specified in the IEEE Wireless Fidelity (Wi-Fi) Standard, 802.11b, which is designed to provide a wireless local area network (WLAN) with a level of security and privacy comparable to what is usually expected of a wired LAN. A wired LAN is generally protected by physical security mechanisms (controlled access to a building, for example) that are effective for a controlled physical environment, but may be ineffective for WLANs because radio waves are not necessarily bound by the walls containing the network. WEP seeks to establish similar protection to that offered by the wired network's physical security measures by encrypting data transmitted over the WLAN. Data encryption protects the vulnerable wireless link between clients and access points; once this measure has been taken, other typical LAN security mechanisms, such as the following can be put in place to ensure privacy: • Password protection, • End-to-end encryption, • VPNs, and • Authentication.

System Summary

Introduction

This section provides a summary to describe the Homeless Management Information System (HMIS) used by the San Bernardino County Continuum of Care (SBC CoC).

Background

HMIS is the information system designated by a local CoC to comply with the requirements of CoC Program interim rule 24 Code of Federal Regulations (CFR) 578. It's a locally implemented data system used to record and analyze client, service, and housing data for individuals and families who are experiencing homelessness or at-risk of homelessness. The United States (U.S.) Department of Housing and Urban Development (HUD) through the Office of Special Needs Assistance Programs (SNAPS) partners with other federal agencies to establish the HMIS requirements to ensure there is a comprehensive data response to the congressional mandate to report annually on national homelessness.

To adhere to Congress' directive, HUD has directed communities to assess their own needs and select the HMIS software that best meets those needs. HUD has provided substantial technical assistance to support the planning process.

All service providers in the SBC CoC are required to participate in HMIS to contribute to a better understanding of homelessness in our communities.

How is HMIS funded?

HMIS is funded through HUD and local county administrative entities, such as the Office of Homeless Services (OHS).

Person center approach to HMIS data collection

To ensure the disparities caused by the homelessness response systems are addressed, person center approach of all the initiatives, practices, evaluation methods, and data collection with equity is required. Black, Indigenous, People of Color, and other communities who have experienced systemic racism and discrimination are overrepresented amongst individuals experiencing homelessness and within the homelessness response systems.

To better understand potential homeless system barriers, to meaningfully design their data collection processes and overall homelessness response system in ways that better meet the needs of those most impacted, communities must engage in meaningful partnerships and shared decision making with the following individuals who:

- Have navigated and/or are navigating the local homeless response system, and
- Are experiencing homelessness not engaged in the system.

Communities must employ a person-centered approach to the review and use of the HMIS Data Standards Manual with a clear foundational understanding of:

- Racial trauma and trauma informed practices,
- Cultural humility, and
- A person first, data informed perspective.

System Summary, Continued

HMIS implementation

To implement, HMIS it must be able to perform the following:

- Collect all the data elements defined within these HMIS Data Standards, Manual,
- Support the system logic identified, and
- Ensure the visibility of data elements is appropriate to the Project Type and Funding Sources for any given project.

Communities may add data elements, response categories, or maintain historical data element collection beyond what is specified in the HUD Data Standards Manual if it does not impact the ability of the CoC to accurately collect and report on the required data elements. In these cases, HMIS Leads should work directly with their HMIS vendors to meet their individual community needs.

SP and comparable databases

Victim Service Providers (VSP) are prohibited from recording survivor information in an HMIS as described in the Violence Against Women Act (VAWA). Instead VSPs are required by HUD to use a comparable database which is defined as relational database that meets all HMIS data standards and minimum standards of HMIS privacy and security requirements, including HUD's most recent reporting standards and comma separated value (CSV) format specifications.

HUD does not certify or endorse any specific HMIS or comparable database software product. CoCs and HMIS leads are responsible for verifying that any software they use meets their needs, including federal reporting requirements. Each software provider should provide the guidance, support, and documentation necessary for the CoC to understand the system they are using.

HMIS documents and resources

There are a variety of documents that comprise HMIS data standards resources. Each of the documents has a specific purpose and intended audience. The HMIS lead should be familiar with the following documents and collectively use them as their HMIS reference materials along with any supplemental instructional materials supplied by the vendor:

- Fiscal Year (FY) 2024 HMIS Data Standards Manual,
- FY 2024 HMIS Data Standards Dictionary, and
- Data Exchange Resources:
  - FY 2024 Comma-Separated Values CSV Programming Specifications,
  - FY 2024 eXtensible Markup Language (XML) Programming Specifications, and
  - FY 2024 Data Logic Model.

Note: HUD will soon release the updated version of the XML Programming Specifications and Data Logic Model for FY 2024.

System Summary, Continued

HMIS Federal partner program manuals

The following manuals contain specific and detailed information about project setup for each of the federal partner programs participating in HMIS including:

- HMIS project typing,
- Specific data elements required for collection by the federal partner,
- Program-specific meanings and definitions, and
- Data the federal partner has identified as required for their program.

Each manual was created jointly by HUD and the relevant federal partner and approved by both entities prior to publishing.

Manual Name	Federal Partner	Program(s)
CoC Program HMIS Manual	HUD - Office of Special Needs Assistance Programs (SNAPS) CoC Program Information link	All CoC Program component projects
Youth Homelessness Demonstration Program (YHDP) HMIS Manual	HUD - SNAPS YHDP Information Link	All YHDP projects
Emergency Solutions Grant (ESG) Program HMIS Manual	HUD SNAPS ESG Program Information link	All ESG Program component projects
Housing Opportunities for Persons with AIDS (HOPWA) Program HMIS Manual	HUD - Office of Human Immunodeficiency Virus/ Acquired Immunodeficiency Syndrome (HIV/AIDS) Housing HOPWA Program Information link	All HOPWA program component projects
Projects for Assistance in Transition from Homelessness (PATH) Program HMIS Manual	U.S. Department of Health and Human Services (HHS) - Substance Abuse and Mental Health Services Administration (SAMHSA) PATH Program Information link	All PATH component projects
Runaway and Homeless Youth (RHY) Program HMIS Manual	HHS - Administration for Children and Families - Family and Youth Services Bureau RHY Program Information Link	All RHY program component projects
U.S. Department of Veteran Affairs (VA) Program HMIS Manual	VA VA Program information link	- Supportive Services for Veteran Families (SSVF) - Grant-Per-Diem (GPD) - Healthcare for Homeless Veterans (HCHV)
Veterans Affairs Supportive Housing (VASH) Program HMIS Manual	HUD – VASH and VA VASH Program link	VASH program

Organization: OHS

OHS is the HUD grantee responsible for administering the HMIS Program grant and is the HMIS Lead Organization. OHS is responsible for establishing, supporting, and managing HMIS in a manner that will meet HUD's standards for minimum data quality, privacy, security, and other requirements for organizations participating in HMIS.

OHS's goal is to go beyond the HUD mandate of producing unduplicated counts of homeless persons. OHS provides a comprehensive case management system that allows the user to use the collected information to make informed program decisions.

System Summary, Continued

OHS Mission Statement & Vision

OHS' mission statement is to improve data collection, advance the provision of quality services for homeless persons, and promote more responsive policies to end homelessness in San Bernardino County.

OHS' vision is dedicated to providing the best possible, highest quality HMIS to enhance the delivery of services for persons experiencing homelessness. Specifically, OHS will:

- Facilitate the coordination of service delivery for homeless persons,
- Enable agencies to track referrals and services provided, report outcomes, and manage client data using accessible, user-friendly, and secured technology, and
- Enhance the ability of policy makers and advocates to gauge the extent of homelessness and plan services appropriately throughout San Bernardino County.

Software: Clarity

The selected software in San Bernardino County, Clarity, is intended to provide value by allowing the user to set and measure client and program milestones and target achievements. The software includes:

- Outcome Management,
- Client demographic data collection,
- Comprehensive client case management,
- Bed maintenance, tracking and assignment module,
- Customized reporting capability,
- Customized assessment capability,
- Real time data collection and reporting,
- Employment, Education and Housing history tracking,
- Savings tracking,
- Group activities management,
- Group case notes management,
- Advanced security features, and
- Outreach capability.

Participation Eligibilities and Priorities

Introduction

This section provides information regarding United States (U.S.) Department of Housing and Urban Development (HUD) established eligibilities and priorities for participation in the Homeless Management Information System (HMIS).

Implementation

HUD recognized that implementing a Homeless Management Information System (HMIS) is a difficult and time-consuming process and must be done in stages based on established eligibilities and priorities.

Eligibilities and priorities

HUD participation eligibilities and priorities include the following:

Eligibility/Priority	Description
1st	Bring the following on board: • Emergency shelters, • Transitional housing programs, and • Outreach programs. **Note:** Providers of emergency shelter, transitional housing, and homeless outreach services should be included in HMIS as early as possible, regardless of whether they receive funding through the McKinney-Vento Act or from other sources.
2nd	HUD encourages the Continuum of Care (CoC) to actively recruit providers of permanent supportive housing funded by: • HUD McKinney-Vento Act programs, and • Other HUD programs.
3rd	The CoC should recruit: • Homeless prevention programs, • Supportive Services Only programs funded through HUD's Supportive Housing Program (SHP), and • Non-federally funded permanent housing programs.

Participation Requirements

Introduction	This section provides information regarding Homeless Management Information System (HMIS) participation requirements.

Participating agencies	Participating Agencies are homeless service providers and other Referring Agencies that utilize the San Bernardino County Continuum of Care (SBC CoC) HMIS for the purposes of:
	
	• Data:
	  – Entry,
	  – Editing,
	  – Reporting, and
	• Referrals.

Adherence to policies	All HMIS participating agencies must adhere to the policies and procedures outlined in this manual to participate in the SBC CoC HMIS. A signed agreement is required from all end users and participating agencies. This policies and procedures system manual and all attachments may be amended, as needed, at any time. Participating agencies will be notified of any changes and/or amendments to this manual via email.
Governing documents	Relationships between the SBC CoC and participating agencies are governed by the following documentation: • Any standing agency-specific agreements or contracts already in place, • The HMIS Participating Agency Memorandum of Understanding (MOU), and • Contents of the HMIS Policies and Procedures System Manual.

HMIS Participating Agency MOU	Prior to obtaining access to SBC CoC HMIS, every agency must adopt the HMIS Participating Agency MOU. The MOU:
	
	• Outlines agency responsibilities regarding participation in the HMIS,
	• Is:
	  – Made between the participating agency Executive Management and the Office of Homeless Services (OHS),
	  – Legally binding and encompasses all state and federal laws relating to privacy protections and data sharing of client specific information, and
	• Contains HUD data and technical standards.

Additional documentation	Prior to obtaining access to SBC CoC HMIS, every agency must be provided with and adopt the following additional HMIS documentation:
	
	• **HMIS Policies and Procedures System Manual**
	  – Signed by each HMIS end user as an agreement to abide by standard operating procedures and ethics of HMIS.
	  – Will be provided to the user after completion of the training.

Participation Requirements, Continued

Additional documentation, continued

- **Client Consent/Information Release Form**
  - To be implemented and monitored by agencies.
  - Requires clients to authorize in writing the entering and/or sharing of their personal information electronically with other participating agencies throughout SBC CoC HMIS where applicable.
- **Privacy Posting/Notice**
  - Participating agencies will post a written explanation describing the agency's privacy policies regarding data entered in SBC CoC HMIS.
- **Grievance Form**
  - The client has a right to file with the HMIS Lead Organization if he/she feels the participating agency has violated his/her rights.
  - Can be found online at https://www.sbcounty.gov/uploads/sbchp/HMIS/resources/HMIS-Grievance-Procedure.pdf.
- **End User Account Request Form**
  - Provided after completion of the training.
  - Used to:
    - ✓ Request a new user,
    - ✓ Change user information, and
    - ✓ Notify the HMIS System Administrator when employees with HMIS access no longer work for the organization and all access to HMIS needs to be revoked/removed.
- **Homeless Provider Network (HPN) Bylaws**
  - Can be found online at https://sbchp.sbcounty.gov/hpn/.
- **10 Year Strategy Re-calibration Plan**
  - Can be found online at https://sbchp.sbcounty.gov/about-sbchp/purpose-mission-and-strategy.

HMIS monitoring

All participating agencies may be subject to an on-site HMIS monitoring designed to:

- Validate compliance of the agency's information security protocols and technical standards,
- Maintain a high level of security, client privacy, and confidentiality practices are being maintained, and
- Provide HMIS technical assistance, if needed or requested by the participating agency.

The following items are examined and documented during the monitoring:

- Physical and environmental security, such as:
  - Personal Computer (PC) location out of public area, and
  - PC access.
- Personnel security, such as:
  - Passwords,
  - Using an up-to-date password protected system,
  - Not sharing passwords,
  - Signed agreements,
  - Number of authorized users, and
  - Training, when needed.

Participation Requirements, Continued

HMIS monitoring, continued

- Application program and usage security, including:
  - Browser security,
  - Warnings, and
  - Inactivity lockouts.
- PC configuration, including:
  - Operating System (OS) Version,
  - Using up-to-date and compatible browsers, such as:
    - ✓ Microsoft Edge,
    - ✓ Google Chrome, and
    - ✓ Firefox.
  - Browser:
    - ✓ Configuration, and
    - ✓ Versions.
  - Up-to-date patch/update levels,
  - Using up-to-date antiviruses (virus protection with updates), and
  - Firewalls.
- Network configuration, including:
  - Internet access method,
  - Firewall/router, and
  - Other network users.
- No network,
- Compliance with HMIS guidelines and United States (U.S.) Department of Housing and Urban Development (HUD) technical standards,
- Informed Consent Agreement,
- Privacy notices,
- Technology security, and
- Data entry practices.

During the on-site monitoring, OHS will also review data quality reports and address any errors found with the participating agency. OHS will run data quality reports for each participating agency prior to their scheduled on-site monitoring and encourage each agency to run these reports themselves beforehand.

Monitoring scheduling and report

OHS will notify the agency's Executive Director and/or Agency Administrator of an upcoming monitoring and will work together to schedule the monitoring. OHS HMIS and program staff will conjunctively perform the monitoring and create the monitoring report identifying monitoring results. The monitoring report will be submitted to the agency's Executive Director and a copy will be filed with OHS for recordkeeping purposes.

Deficiencies and follow-up monitoring

Any deficiencies in practices or security must be resolved within two weeks. A follow-up monitoring will be conducted to ensure recommended changes/corrections have been implemented.

Participation Requirements, Continued

HUD's Technical standards	OHS, as the HMIS Lead Organization, is responsible for each participating agency's oversight and adherence to the following HUD's technical standards:

- **High Speed internet access**:
  - Digital Subscriber Line (DSL), Cable, T1 Line, etc.,
  - No dial up connections, and
  - Dedicated Internet Protocol (IP) address is recommended.
- **PC w/ Internet Explorer 5.5 or higher**:
  - No Netscape, Mozilla, AOL, etc., and
  - No Mac's, UNIX, Linux, etc.
- **Microsoft .NET Framework Version 2.0 or higher**:
  - Can be downloaded from www.microsoft.com/downloads,
  - Windows NT sp6a, Windows XP, and
  - If running Windows XP, we recommend running SP2.
- **Firewall**:
  - Must use Network Address Translation (NAT) behind firewall,
  - If wireless is used must be protected with at minimum Wired Equivalent Privacy (WEP), and
  - Must be placed between any internet connection and PC for the entire network.
- **Antivirus on ALL systems connected to an agency's network**:
  - Must have most recent virus security updates, and
  - This includes systems which terminal or VPN into the network.

Staffing roles and responsibilities	Participating agencies must have staff assigned to the roles and responsibilities in the table below. Although responsibilities for staff will vary, all functions must be communicated to the HMIS System Administrator.

Role	Responsibilities

Executive Management *Oversight responsibility for all activities associated with agency's participation in OHS*	• Signs the **HMIS Participating Agency MOU** and any other required forms prior to accessing SBC CoC HMIS,
	• Authorizes data access to agency staff and assigns responsibility for custody of the data,
	• Establishes, adopts, and enforces business controls and agrees to ensure organizational adherence to SBC CoC **HMIS Policies and Procedures System Manual**,
	• Communicates control and protection requirements to HMIS users and other agency staff as required,
	• Assumes responsibility for:
	  – The integrity and protection of client-level data entered into the system,
	  – Posting the **Privacy Posting/Notice**,
	  – The maintenance and disposal of on- site computer equipment, and
	  – Liability for any misuse of the software by agency staff.
	• Provides written permission to the HMIS System Administrator to perform the decryption of:
	  – Data to upgrade SBC CoC HMIS technology,
	  – Agency data to upgrade SBC CoC HMIS database server to new technology when the database becomes obsolete, and
	• Periodically reviews system access control decisions.

Participation Requirements, Continued

Staffing roles and responsibilities, continued

Role	Responsibilities

Outcome/ Program Manager and/or Agency Administrator *Internal agency resource for outcome management planning and implementation*	• Serves as the liaison between agency managers, HMIS users and Outcome Specialists,
	• Attends:
	  – Required training and technical assistance sessions, and
	  – HMIS end-user meeting.
	• Develops and enters into SBC CoC HMIS the outcome performance targets and milestones, and
	• Reports system problems and data-related inconsistencies to HMIS System Administrator or Outcome Specialist as needed.

HMIS End-User	• Completes training on the appropriate use of SBC CoC HMIS prior to accessing the system, • Acknowledges an understanding of this **HMIS Policies and Procedures System Manual**, • Adheres to any agency policies that affect the security and integrity of client information, • Is responsible for SBC CoC HMIS data quality, – Data quality refers to the timeliness of entry, accuracy, and completeness of information collected and reported in HMIS. • Signs the **HMIS Policies and Procedures System Manual** and any other required forms prior to accessing system, • Reports system problems and data-related inconsistencies to Agency Administrator or Outcome Manager as appropriate, • If applicable, obtains client signature on **Client Consent/Information Release Form**, • Gives client copy of **Client Consent/Information Release Form**, and • Verbally communicates client's rights and uses of client's data.

Training

All HMIS users must complete training prior to gaining access to the SBC CoC HMIS. OHS will provide training to all users at the beginning of the agency's SBC CoC HMIS implementation and refresher training for other users as needed. Training topics covered during the HMIS training include:

- Privacy/ethics,
- Data security,
- Data quality,
- HMIS users, and
- Reporting.

At the time of training, each agency is given guidelines for providing a secure environment for their clients and employees who use HMIS.

Client Rights

Introduction	This section describes the rights for clients served by agencies participating in the San Bernardino County Continuum of Care (SBC CoC) Homeless Management Information System (HMIS).

Communication rights	Communication rights include the following:

- Clients have a right to:
    - Privacy and confidentiality, and
    - Not answer any questions unless entry into the agency's program requires it.
- Client information may not be shared without informed consent (posting of **Privacy Posting/Notice** and **Mandatory Collection Notice**),
- Every client has a right to an understandable explanation of SBC CoC HMIS and what "consent to participate" means. The explanation must include:
    - Type of information collected,
    - How the information will be used,
    - Under what circumstances the information will be used,
    - Informing that refusal to provide consent to collect information will not be grounds for refusing entry to the program,
    - A copy of the:
        - ✓ Consent will be given to the client upon request, and a signed copy kept on file at the participating agency, if applicable,
        - ✓ **Privacy Posting/Notice** will be made available upon client request, and
        - ✓ **Client Consent/Information Release Form** will be made available upon client request.

Participation opt-out	Clients have a right to not have their personal identifying information in SBC CoC HMIS shared outside the agency and services cannot be refused if the client chooses to opt-out of participation in HMIS. However, clients may be refused program entry for not meeting other agency eligibility criteria.

Access to records	A client has the right to request access to his/her personal information stored in SBC CoC HMIS from the authorized agency personnel. The agency, as the custodian of the client data, has the responsibility to provide the client with the requested information except where exempted by state and federal law.

When requested, a client has the right to:

- View his or her own data contained within SBC CoC HMIS, or
- Receive a printed copy of his or her own data contained within SBC CoC HMIS.

Client Rights, Continued

Access to records, continued

No client will have access to another client's records within SBC CoC HMIS. However, parental/guardian access will be decided based upon existing agency guidelines. The information contained in the Central Intake section of SBC CoC HMIS can be provided by any agency in receipt of the client's request, as long as the client has previously given consent to share and that consent is still in force.

Grievances

The client has the right to file a grievance with the participating agency. All participating agencies must have written grievance procedures that can be provided to a client on demand. If, after following the grievance procedure, the grievance is not resolved, the complaint may be escalated to the Office of Homeless Services (OHS). The **HMIS Grievance Form** and **HMIS Grievance Procedure** is found online at https://sbchp.sbcounty.gov/resources/.

Policies for End-Users and Participating Agencies

Introduction	This section outlines the policies for end-users and participating agencies who have access to the San Bernardino County Continuum of Care (SBC CoC) Homeless Management Information System (HMIS).

User access	User access will be granted only to individuals whose job functions require legitimate access to the SBC CoC HMIS. Each HMIS end-user will satisfy all the conditions herein and sign the **HMIS Policies and Procedures System Manual** before being granted access to SBC CoC HMIS.

The participating agency will determine which of its employees require access to SBC CoC HMIS. Identified users must sign the **HMIS Policies and Procedures System Manual** indicating they:

- Have received training, and
- Will:
    - Abide by SBC CoC HMIS policies and procedures,
    - Appropriately maintain the confidentiality of client data, and
    - Only collect, enter, and retrieve data in SBC CoC HMIS relevant to the delivery of services to homeless people in the area served by SBC CoC HMIS.

The Office of Homeless Services (OHS) is responsible for the distribution, collection, and storage of the signed **Acknowledgment** page in the **HMIS Policies and Procedures System Manual**. The HMIS System Administrator will verify the existence of signed **HMIS Policies and Procedures System Manual** and obtain copes during the on-site review process.

User activation	The HMIS System Administrator will provide unique usernames to each participating agency end-user.

Usernames will be unique for each user and will not be shared with other users. The HMIS System Administrator will set up a unique username for each user upon completion of training and receipt of the signed **HMIS Policies and Procedures System Manual** from each user. The sharing of usernames will be considered a breach of the **HMIS Policies and Procedures System Manual**.

Passwords	The participating agency end-users will create their own unique passwords. Passwords must contain:

- No less than eight,
- No more than sixteen characters in length, and
- Alphanumeric with upper and lower case and special characters.

To reset a user's password, the user may click on the "Forgot Password" option on the HMIS login page or contact the HMIS System Administrator to reset the password if he/she is still having difficulty.

HMIS requires the user to change their password every six months. After six months, passwords will expire and user will be prompted to enter a new password. Users may not use the same password more than once.

Policies for End-Users and Participating Agencies, Continued

Passwords,
continued

If a user unsuccessfully attempts to login four times, the following will occur:

- User ID will be "locked out" for two hours,
- Access permission will be revoked, and
- User will be unable to gain access to his/her account by:
    - Resetting their own password after the two hours, or
    - Contacting the HMIS System Administrator to unlock the account prior to the two hours.

User level access

When a user requests access to HMIS, the HMIS System Administrator will grant him/her agency staff user access to allow the enrollment of a client that results in the creation of a client profile to enter the following information:

- Program Entry,
- Case Notes,
- Referrals for housing and homeless assistance,
- Income,
- Assessments,
- Group Services,
- Program Exit, and
- Household demographics.

Confidentiality and Informed Consent

All participating agencies agree to abide by and uphold all privacy protection standards established by SBC CoC HMIS as well as their respective agency's privacy procedures. The agency will also uphold relevant federal and state confidentiality regulations and laws that protect client records and will only release program level client data with written consent by the client or the client's guardian, unless otherwise provided for in the regulations or laws.

Participating agencies are required to develop procedures for providing oral explanations to clients about the usage of a computerized HMIS and post a **Mandatory Collection Notice** and **Privacy Posting/Notice** (English and Spanish) to share central intake client information with other HMIS participating agencies. The United States (U.S.) Department of Housing and Urban Development (HUD) Data Standards provides guidance for participating agencies regarding certain HMIS policies. In instances of conflict between state or federal law and the HUD Data and Technical Standards, the state and/or federal law take precedence. All clients will be provided an oral explanation stating their information will be entered into a computerized record keeping system. The participating agency will provide an oral explanation of SBC CoC HMIS and the terms of consent. The agency is responsible for ensuring this procedure takes place prior to every client interview.

For each client whose program level information is shared with another participating agency, an HMIS service request must be submitted via the HMIS Helpdesk mailbox at OHS-HMISHelpDesk@hss.sbcounty.gov. A client must be informed about the information being shared and with whom it is shared. The participating agency agrees to not release client identifiable information to any other organization pursuant to federal and state law without proper client consent.

Policies for End-Users and Participating Agencies, Continued

Confidentiality and Informed Consent, continued

If a client withdraws consent for release of information, the agency remains responsible to ensure the client's information is unavailable from date of withdrawal to all other participating agencies. The participating agency will keep signed copies of the **Client Consent/Information Release Form** (if applicable) for SBC CoC HMIS for a minimum of seven years from the date of client exit.

Federal and state confidentiality regulations

The participating agency will uphold all relevant federal and state confidentiality regulations to protect client records and privacy. In addition, the participating agency will only release client records with written consent by the client, unless otherwise provided for in regulations including, but not limited to abide by/with the:

- Federal confidentiality rules included in the Code of Federal Regulations (CFR) 42 Part 2 Confidentiality of Alcohol and Drug Abuse Patient Records, regarding disclosure of alcohol and/or drug abuse records.
  - The federal regulation prohibits the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by CFR 42 Part 2.
  - A general authorization for the release of medical or other information is not sufficient for this purpose.
  - The participating agency understands that the Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.
- Health Insurance Portability and Accountability Act of 1996 and corresponding regulations passed by the United States (U.S.) Department of Health and Human Services (HHS).
  - The regulations provide consumers with new rights to control the release of medical information, including:
    - ✓ Advance consent for most disclosures of health information, and
    - ✓ The right to see a copy of health records, request a correction to health records, and obtain documentation of disclosures of information may be used or disclosed.
  - The current regulation provides protection for paper, oral, and electronic information.
- California Government Code 11015.5 regarding program level personal information collected on the internet.
  - The Government Code ensures that any electronically collected personal information about clients cannot be shared with any third party without the client's written consent.

The participating agency will not solicit or input information from clients unless it is essential to provide services or conduct evaluation or research. All client identifiable data is inaccessible to unauthorized users. Participating agencies are bound by all restrictions placed upon the data by the client of any participating agency. The participating agency will diligently record in SBC CoC HMIS all restrictions requested and will not knowingly enter false or misleading data under any circumstances. The participating agency will maintain appropriate documentations of client consent to participate in SBC CoC HMIS.

Privacy and Mandatory Collection Notices	The participating agency must post **Privacy Posting/Notice** and **Mandatory Collection Notices** at each intake desk or comparable location. The **Privacy Posting/Notice** and **Mandatory Collection Notice** must be made available in writing at the client's request. If the agency maintains an agency website, a link to the **Privacy Posting/Notice** must be on the homepage of the agency's website.
Data integration	HMIS data integration refers to the data that is integrated from a SBC CoC agency that is currently collecting client level data in a HMIS data system other than the current software that is being utilized by the SBC CoC HMIS participating agencies. OHS does not allow for agencies to integrate data to/from other systems.
Data quality	HMIS users are responsible for ensuring data quality. Data quality refers to the timeliness, accuracy and completeness of information collected and reported in SBC CoC HMIS. All participating agencies agree to enter, at a minimum, HUD required universal data elements. HMIS data quality refers to the extent data recorded in the SBC CoC HMIS accurately reflects the same information in the real world. Participating agencies need to adopt HUD's data quality standards to help SBC CoC better understand and address homelessness in San Bernardino County. Data quality refers to the timeliness, accuracy, completeness, and consistency of information collected and reported in SBC CoC HMIS.
Data timeliness	To ensure the most up-to-date data, information should be entered by the user timely and as soon as it is collected. Intake data needs to be added within two working days of the intake process or client encounter. Information that tends to change periodically also needs to be regularly verified and/or updated, such as information on income sources and amounts.
Using paper-based data collection forms	Agencies may choose to collect client data on paper and enter it into the HMIS software later, rather than entering it directly in the system. If data is collected by paper first, that information must be entered into the HMIS system within two days. Each agency will incorporate HMIS into its own operating processes; some agencies will prefer to interview clients and simultaneously enter their information directly into the computer, other agencies will find it easier to collect information on paper first, and then have someone enter the data later. Agencies may utilize the HMIS paper-based forms for initial data collection. Agencies will have two calendar days from the point of the event (intake/enrollment, service delivery, or discharge) to record the information into the HMIS software. HMIS requires all agencies ,who enter data into the HMIS, to complete the program specific data fields even if the funding received by the agency does not dictate they do so. The additional data points will prove extremely helpful for the agency when reporting about client outcome measurement/progress, internal accounting for service delivered, and external reporting to funders.

Policies for End-Users and Participating Agencies, Continued

Data accuracy
Information entered into HMIS must accurately represent information about the people that enter any of the homeless service programs contributing data to the SBC CoC HMIS.

Data completeness
To release meaningful information from the SBC CoC HMIS, data needs to be as complete as possible. Data must contain all required information about all people served in the program (i.e., emergency shelter) during a specified time period. On the macro level, the goal of achieving adequate HMIS coverage and participation by all local programs is essentially about ensuring that the records are representative of all the clients served by these programs. If a client record is missing, then aggregate reports may not accurately reflect the clients served by the program. Similarly, if an entire program is missing, data from the SBC CoC HMIS may not accurately reflect the homeless population in the community.

Data consistency
HMIS end-users must have an understanding about what data needs to be collected. Different interpretations about how questions for data collection should be asked or a lack of understanding about what answers to questions mean lead to aggregate information that cannot be correctly interpreted and presented.

Data quality assurance
To ensure HMIS data quality, the HMIS System Administrator uses a variety of data quality monitoring reports that identify missing universal data elements including program entry and un-exited clients.

HMIS Data Standards Manual
The overall standards for HMIS software are presented in the **HMIS Data Standards Manual Version 1.6** released May 2023 and updated June 2024. Copies will be available upon request.

Data quality report
The data quality report calculates the percentage of required client-level data elements with null or missing values divided by the total number of client records. The report will calculate the number of usable values (all values excluding "Don't know" and "Refused" responses) in each required field over any desired time period (e.g., last month, last year). The report will be generated for each program, different types of programs, and across the entire CoC.

The program level reports will cover all applicable universal and program-specific data elements. The CoC reports will be limited to the following universal data elements:

- Name,
- Social Security Number (SSN),
- Data of Birth,
- Ethnicity,
- Race,

Data quality report, continued

- Veteran Status,
- Gender,
- Disabling Condition, and
- Residence prior to program entry.

Percentages will be based on the universe of client records for which the data element is required. ***Example****:* Percent null for veterans equals number of clients with no veteran status recorded/number of adults.

Duplicate Clients Report

The Duplicate Clients Report provides a list of potential duplicate client files for system administration use. The Duplicate Clients Report highlights records that match, using the HMIS Lead Agency's primary methodology, but have conflicting values in other identifiable fields.

Housing Inventory Report

The Housing Inventory Report is designed to inform about housing stock available in a community dedicated for homeless persons. The report also offers a point-in-time look at utilization.

The report will help to identify potential data quality issues by flagging facilities with bed or family unit utilization rates above 105% or below 65%. The report requires client level data and program descriptor data to be entered into HMIS for all clients served in programs that provide beds.

Data Quality Report and Performance Monitoring Report

Running the Data Quality Report and Performance Monitoring Report will provide the differences between the date in which the program entry date or exit date was entered for clients and the dates in which actual entry or exit occurred for all programs. The reports are based on program entry dates and exit dates and compares the dates this data was entered to the actual values contained in these fields. The "Creation Date" for these fields is automatically recorded when the user enters data. This data will be compared to the Data Timeliness Benchmark (two days to enter client data from actual intake date) set by the CoC.

Reducing client record duplications in HMIS

To reduce the duplication of client records, HMIS participating agency users must always search for the client in HMIS before creating a new client record.

The burden of not creating duplicate records falls on each participating agency. HMIS does not prevent duplicate client records from entering the database, therefore it is up to each user to ensure every client is first searched for, and if not found, then be added.

If duplicate matches are found, the user must determine if any of the records found match their client. Having multiple (duplicate) records in the database for a single client causes confusion and inaccurate information being stored. When an HMIS participating agency user is collecting data from a client, the HMIS participating agency user will first attempt to locate that client in the system by searching either name (first, last, and middle), or unique identifier.

Reducing client record duplications in HMIS, continued

A client can be entered with their unique identifier instead of their name for confidentiality reasons determined by the agency. The HMIS participating agency user will continue to add the basic universal data elements for the client's intake.

Data quality and correction

To produce high quality reliable reports, it is imperative to possess high quality data. HMIS Project Managers will help assure stakeholders the data contained within HMIS is of high quality.

At the end of each month, the HMIS System Administrator will review the quality of each agency's data by running reports out of HMIS for data quality and potential corrections. A Data Quality Report Card is generated once a month for agencies to review and are posted on the SBCHP website.

Agency administrators are required to perform the following:

- Run their own Data Quality Report for each of the agency's programs,
  - The Data Quality Report is generated once a month for the Monthly Report Cards posted on the Homeless Provider Network (HPN) website.
- Respond to the HMIS Lead Agency's request for data clean-up, and
- Work with the HMIS System Administrator to:
  - Rectify any shortfalls in data quality, and
  - Fix issues within five business days.

Data use by SBC CoC

For purposes of SBC CoC planning, the aggregate data can be used to generate an unduplicated count of clients and understand their characteristics, factors contributing to homelessness, and use of system resources. The information can identify gaps and duplication in services.

Data use by OHS

For purposes of system administration, user support, and program compliance, OHS will use the data contained within the SBC CoC HMIS for analytical purposes only and will not disseminate client-level data. OHS will release aggregate data contained within the SBC CoC HMIS for research and reporting purposes only.

Data use by agency

As the guardians entrusted with client personal data, HMIS users have a moral and legal obligation to ensure the data they collect is gathered, accessed, and used appropriately. It is also the responsibility of each user to ensure client data is:

- Only used to the ends:
  - To which it was collected, and
  - That have been made explicit to clients.
- Consistent with the mission of the agency and HMIS to assist families and individuals in resolving their housing crisis.

Policies for End-Users and Participating Agencies, Continued

Data use by agency, continued

Proper user training, adherence to SBC CoC HMIS policies and procedures, and a clear understanding of client confidentiality are vital to achieving these goals. Any individual or participating agency misusing or attempting to misuse SBC CoC HMIS will be denied access to the system.

Maintenance of onsite computer equipment

Participating agencies commit to a reasonable program of data and equipment maintenance to sustain an efficient level of system operation. Participating agencies must meet the technical standards for minimum computer equipment configuration, such as:

- Internet connectivity,
- Antivirus, and
- Firewall.

The Executive Management or designee will be responsible for on-site computer equipment and data used for participation in the SBC CoC HMIS including the following:

- **Computer equipment,**
  - The participating agency is responsible for maintenance of on-site computer equipment. This includes requiring the following workstation(s) accessing SBC CoC HMIS to have a:
    - ✓ Username/ password to log onto the Microsoft Windows Operating System,
    - ✓ Locking, password- protected screen saver,
    - ✓ Public Key Infrastructure (PKI) certificate, and
    - ✓ Static IP address.
  - All workstations and computer hardware (including agency network equipment) must be stored in a secure location (locked office area).
- **Data storage,** and
  - The participating agency agrees to only download and store data in a secure environment.
- **Data disposal.**
  - The participating agency agrees to dispose of documents that contain identifiable client level data by:
    - ✓ Shredding paper records,
    - ✓ Deleting any information from diskette before disposal, and
    - ✓ Deleting any copies of client level data from the hard drive of any machine before transfer or disposal of property.

Downloading of data

HMIS users will maintain the security of any client data extracted from SBC CoC HMIS and stored locally, including all data contained in custom reports. HMIS end-users may not electronically transmit unencrypted client data across a public network.

To ensure that SBC CoC HMIS is a confidential and secure environment, data extracted from SBC CoC HMIS and stored locally will be stored in a secure location and will not be transmitted outside of the private local area network unless it is properly protected. Security questions can be addressed to the HMIS System Administrator. Any Personally Identifiable Information (PII) will not be distributed through e-mail.

Policies for End-Users and Participating Agencies, Continued

Data collection Participating agencies are responsible for inputting their own client data in HMIS under the respective user's portal. The OHS HMIS Team **will not** be inputting client data on behalf of participating agencies.

Note: If technical support is needed to input client data, submit a request or ticket through the Spiceworks portal.

Data sharing Basic client information within the system will be shared based upon the level of consent designated by the client within SBC CoC HMIS. A client may choose to limit the period of time for which their data will be shared.

Data sharing refers to the sharing of information between participating agencies for the coordination of case management and client service delivery. Basic client information in the central intake includes:

- Demographics,
- Household,
- Referral,
- Eligibility,
- Education/Employment, and
- Scanned Documents.

Clients may agree to the level of consent and time period to which the consent is valid. Participating agencies are not required to agree to such requested restrictions if collection and sharing of such data is necessary for service delivery and reporting or consent is broader than that normally extended at their agency. Clients may elect to share additional information as indicated in Section III, IV, VII, and IX of the **HMIS Participating Agency Memorandum of Understanding (MOU)**.

Program level information in either electronic or paper form will never be shared outside of the originating agency without written client consent. Information that is shared with written consent will only be used for the purpose of service delivery, such as:

- Shelter stays,
- Food,
- Clothing,
- Transportation,
- Employment,
- Housing,
- Childcare,
- Utilities assistance, and
- Life-skills sessions.

Policies for End-Users and Participating Agencies, Continued

Data sharing, continued

Aggregate level (client de-identified) data may be released by agencies, the SBC CoC, and/or SBC CoC HMIS under certain criteria. Client-level data may only be released with written consent from the client for a specified purpose.

Data release refers to the dissemination of aggregate and/or client-level information for:

- Statistical,
- Analytical,
- Reporting,
- Advocacy,
- Regional needs assessment, and
- Trend analysis.

Each participating agency owns all data it enters into SBC CoC HMIS. The agency may not release any client level information without the written consent of the client. Agencies may release program and/or aggregate level data for all clients to whom the agency provided services. No individual client data will be provided to any group or individual who is neither the participating agency that entered the data nor the client without proper authorization or consent by the client. This consent includes the written authorization for each individual or group requiring access to the client's data.

OHS will develop an annual release of aggregate data in a summary report format. The format for data requests can vary based on the type of data needed. OHS will not release agency or client-specific data to outside groups or individuals.

Agency customization

A participating agency will have the ability to request system customization at the agency level to reflect the data collection needs for its specific program(s). SBC CoC HMIS contains certain fields that can be tailored at no cost to the agency. Additional customization as performed by the software vendor or HMIS System Administrator may be purchased at the expense of the agency.

Participating agencies have some ability to customize SBC CoC HMIS fields to meet the specific needs of the program. At the request of the Agency Administrator, the HMIS System Administrator will evaluate the request and implement the changes as warranted.

Projects that operating in multiple CoCs

For projects that operate in multiple CoCs, funding recipients are expected by the federal partners to participate in the HMIS implementation of each CoC in which they operate projects.

San Bernardino County has a single established CoC currently and does not have projects operating in multiple CoCs.

Project setup additional information

Additional information and guidance regarding setting up a specific project in HMIS can be found in the Fiscal Year (FY) 2024 HMIS Data Standards Manual available on the HUD Exchange website.

Data Elements

Introduction	This section provides information regarding the various types of data elements to be collected in the Homeless Management Information System (HMIS) as required by the United States (U.S.) Department of Housing and Urban Development (HUD).

Data element structure

There are data elements required by HUD and the Federal partners to be stored within an HMIS, such as the:

- Project Descriptor Data Element,
- Universal Data Element, and
- Program Specific Data Element.

Each data element includes a brief explanation of the following:

- Who the data is collected about,
- Funder/program component requiring the data to be collected,
- Project types required to collect this data, and
- Data Collection Stage.

Federal partner program specific data elements

Federal partners are required to collect specific data elements pertaining to their program. The Federal partner program specific data elements include:

- Moving on Assistance Provided,
- Youth Education Status, and
- Translation Assistance Needed.

Federal partners who have worked collaboratively to create specific programs to help prevent and end homelessness include the following:

- HUD - Office of Special Needs Assistance Programs (SNAPS),
- HUD - Office of Human Immunodeficiency Virus/ Acquired Immunodeficiency Syndrome (HIV/AIDS) Housing,
- U.S. Department of Health and Human Services (HHS) - Substance Abuse and Mental Health Services Administration (SAMHSA),
- HHS - Administration for Children and Families - Family and Youth Services Bureau, and
- U.S. Department of Veterans Affairs (VA).

Note: Additional guidance regarding data collection rationale, specific project setup, and data collection instructions can be found in the Fiscal Year (FY) 2024 HMIS Data Standards Manual available on the HUD Exchange website.

Continued on next page

Data Elements, Continued

Housing Opportunities for Persons With AIDS (HOPWA) program specific data elements

The HOPWA program specific data elements should only appear in HMIS projects with at least one HOPWA program component and as required by the particular HOPWA project type. The HOPWA program specific data elements include:

- Services Provided - HOPWA,
- Financial Assistance - HOPWA,
- Medical Assistance,
- T-cell (CD4) and Viral Load,
- Housing Assessment at Exit, and
- Prescribed Anti-Retroviral.

Note: Refer to the HOPWA Program HMS Manual for additional guidance regarding the rationale, data collection instructions, and response descriptions for all HOPWA data elements.

Metadata elements

Metadata elements are intended to:

- Facilitate reporting from HMIS,
- Simplify the writing of programming specifications, and
- Provide an audit trail.

These elements do not represent an attempt to standardize the way an HMIS stores data. If HMIS can accomplish the purposes identified for the Metadata elements, the software is not required to use the exact metadata elements listed below. Future programming specifications for reports will reference Metadata Elements that include:

- Date Created and Updated,
- Data Collection Stage,
- Information Date,
- Project Identifier,
- Enrollment Identifier,
- User Identifier,
- Personal Identifier,
- Household Identifier, and
- HMIS Implementation Identifier.

Note: Refer to the FY 2024 HMIS Data Dictionary and FY 2024 HMIS Data Standards Manual for meta data elements requirements.

Projects for Assistance in Transition from Homelessness (PATH) project specific data elements

All PATH projects are required to collect relevant program specific data elements, which include:

- Services Provided – PATH,
- Referrals Provided – PATH,
- PATH Status, and
- Connection with SSI/SSDI Outreach, Access, and Recovery (SOAR),

Note: Refer to the PATH Program HMIS Manual for additional guidance regarding the rationale, data collection instructions, and response descriptions for all PATH data elements.

Data Elements, Continued

Project descriptor data elements (PDDEs)

PDDEs are intended to identify the organization, specific project, and project details to which an individual client record is associated in an HMIS. They ensure information about each project is available to:

- Complete:
  - Required APRs, and
  - Quarterly Performance Reports (QPRs),
- Calculate rates of HMIS participation, and
- Monitor data quality.

PDDEs enable the HMIS to:

- Associate client-level records with the various projects the client will enroll in across continuum projects,
- Clearly define the type of project the client is associated with the entire time they received housing or services,
- Identify which federal partner programs are providing funding to the project, and
- Track bed and unit inventory and other information, by project, which is relevant for the following:
  - Longitudinal Systems Analysis (LSA),
  - System Performance Measures (SPM),
  - Housing Inventory Counts (HIC),
  - Point-in-Time (PIT) counts, and
  - Utilization analysis.

The CoC must collect project information in HMIS for all CoC projects within its jurisdiction, regardless of whether the project participates in the HMIS. The purpose of these requirements is to ensure HMIS is the central repository of information for homelessness in the CoC, including information about programs and clients. PPDEs include the following:

- Organization Information,
- Project Information,
- CoC Information,
- Funding Sources,
- Bed and Unit Inventory Information,
- HMIS Participation Status, and
- Coordinated Entry (CE) Participation Status.

Note: Additional information about PDDEs is located in the Fiscal Year (FY) 2024 HMIS Data Standards Manual available on the HUD Exchange website.

Data Elements, Continued

Project specific data elements

Most of the project specific data elements are required for HUD McKinney Vento programs that are required to submit Annual Performance Reports (APRs). These programs include Shelter Plus Care, SHP, Section 8 Single Room Occupancy (SRO) Moderate (Mod) Rehab for the homeless, and HOPWA-funded homeless programs. Program specific data elements include:

- Income and sources,
- Non-cash benefits,
- Health insurance,
- Physical and developmental disability,
- Chronic health condition,
- HIV/AIDS,
- Mental health and substance use disorder,
- Domestic violence,
- Current living situation,
- Date of engagement,
- Bed-night date, and
- CE assessment and entry event.

Note: Additional information about project specific data elements is located in the Fiscal Year (FY) 2024 HMIS Data Standards Manual available on the HUD Exchange website.

Runaway and Homeless Youth (RHY) program specific data elements

Information on the following RHY program specific data elements are required to be collected by at least one RHY program component:

- Referral source,
- RHY – Basic Center Program (BCP) Status,
- Sexual orientation,
- Last grade completed,
- School status,
- Employment status,
- General health status,
- Dental, medical, and pregnancy health status,
- Formerly a ward of a child welfare/foster care agency and juvenile justice system,
- Family critical issues,
- RHY service connections,
- Commercial sexual exploitation/sex trafficking,
- Labor exploitation/trafficking,
- Project completion status,
- Counseling,
- Safe and appropriate exit, and
- Aftercare plans.

Note: Information regarding the rationale, data collection instructions, and response descriptions RHY data elements is located the Fiscal Year (FY) 2024 HMIS Data Standards Manual available on the HUD Exchange website.

Data Elements, Continued

Universal data elements (UDEs)

UDEs are elements required to be collected by all projects participating in HMIS, regardless of the funding source. Projects funded by any one or more of the federal partners must collect the UDEs, as do projects that are not funded by any federal partner (e.g., missions), but have agreed to enter data as part of the CoC's HMIS implementation.

HUD requires all CoC programs, especially those that house homeless individuals (Homeless Assistance Programs) and are identified on the CoC's Housing Inventory Chart, to collect UDEs and program information on all clients served regardless of whether the program participates in HMIS. UDEs are the basis for producing unduplicated estimates of the number of people experiencing homelessness accessing services from homeless assistance projects, basic demographic characteristics of people experiencing homelessness, and patterns of service use, including information on shelter stays and homelessness over time.

The following UDEs must be captured and input into HMIS for each client served including children in all Emergency Shelter Programs, Emergency Solutions Grant (ESG), Supportive Housing Program (SHP), Veteran's Supportive Housing, and HOPWA:

- Name,
- Social Security Number (SSN),
- Date of birth,
- Race and ethnicity,
- Gender,
- Veteran status,
- Disabling condition,
- Program start and exit date,
- Destination,
- Relationship to head of household,
- Enrollment CoC,
- Housing move-in date for the following:
  - Rapid Re-Housing (RRH),
  - Permanent Supportive Housing (PSH), and
  - Permanent Housing (PH), and
- Prior living situation, only applicable to the following:
  - RRH,
  - PSH,
  - PH,
  - Emergency Shelter,
  - Street outreach, and
  - Safe Havens.

Note: Refer to the FY 2024 HMIS Data Standards Manual for additional guidance on UDEs.

Continued on next page

Data Elements, Continued

Veterans Affairs (VA) program specific data elements

All VA-funded projects participating in HMIS are required to collect and enter relevant program specific data elements that include:

- Veteran's information,
- Services provided – SSVF,
- Financial assistance,
- Percent of AMI (SSVF Eligibility),
- VAMC station number,
- HP targeting criteria, and
- HUD-VASH voucher tracking and exit information.

Note: Refer to the VA Program HMIS Manual for additional guidance on the rationale, data collection instructions, and response descriptions for all VA data elements. HUD-VASH Project setup information can also be found in the HUD-VASH Program HMIS Manual.

Data elements additional information

To obtain rationales and additional guidance on data collection for the various types of data elements, refer to the Fiscal Year (FY) 2024 HMIS Data Standards Manual available on the HUD Exchange website.

Technical Support and System Availability

Introduction	This section outlines the technical support and system availability for the San Bernardino County Continuum of Care (SBC CoC) Homeless Management Information System (HMIS).

Technical support	The Office of Homeless Services (OHS) will provide technical support to all Agency Administrators and HMIS end-users as needed. Technical support hours are Monday through Friday from 8:00 a.m. – 5:00 p.m. Pacific Standard Time (PST), excluding holidays.
	
	OHS staff will respond in a timely manner to any requests for technical support made during the hours indicated above. For technical support, submit a request or ticket through the Spiceworks portal.
	
	Assistance will be provided in the following areas:
	
	• **Help Desk Support,**
	  – Provided to help HMIS end-users access and utilize the SBC CoC HMIS, including technical support for installed SBC CoC HMIS software.
	• **Trainings,**
	  – User and report training.
	• **System Customization,**
	  – SBC CoC HMIS contains certain fields that can be tailored at no cost to the agency.
	• **Reporting,** and
	  – Training and technical assistance in accessing standardized reports.
	• **Data Analysis.**
	  – Interpreting reports.
	
	End-users unable to resolve an issue with HMIS can submit a request or ticket through the Spiceworks portal. The OHS HMIS Team will contact the HMIS vendor, Bitfocus, if they are unable to resolve the end-user's problem.

Spiceworks portal	Spiceworks is an online portal the OHS HMIS Team uses for their helpdesk dashboard to better serve and resolve troubleshooting tickets or requests submitted by participating agencies. The OHS HMIS Team will provide each participating agency with a link to set up their Spiceworks portal upon completion of the HMIS New User training and/or Program Support Assessment (PSA). **Note:** If technical support is needed with the Spiceworks portal, contact the OHS HMIS Helpdesk by email at OHS-HMISHelpDesk@hss.sbcounty.gov or by phone at (909) 501-0600.
Downtime for upgrades and patches	Necessary downtime for SBC CoC HMIS upgrades and patches will be communicated by the HMIS System Administrator system wide. Notification will be made via e-mail with the schedule for service interruption. The notice will explain the need for the interruption and expected benefits or consequences.

Technical Support and System Availability, Continued

Unplanned interruption to service

In the event of unplanned service interruption, the HMIS System Administrator will notify all participating agencies as soon as possible.

When an event occurs that makes SBC CoC HMIS inaccessible, the HMIS System Administrator will analyze and determine the problem. In the event it is determined that SBC CoC HMIS accessibility is disabled system-wide, the HMIS System Administrator will work with the software vendor to repair the problem. As soon as the problem is identified, participating agencies will be informed of the estimated system availability. The HMIS System Administrator will notify participating agencies via e-mail when service has resumed.

HMIS Policies and Procedures System Manual

Every HMIS end-user will receive a copy of this **HMIS Policies and Procedures System Manual**.

The OHS HMIS Team will provide this **HMIS Policies and Procedures System Manual** initially at new user training. The manual will provide users with the guidelines to use HMIS.

System Architecture and Security

Introduction

This section outlines the system architecture and security for the San Bernardino County Continuum of Care (SBC CoC) Homeless Management Information System (HMIS).

Encryption management

Client Protected Personal Information (PPI) stored in the central server will always be encrypted, except during specific procedures.

Client's confidential information will only be decrypted when the SBC CoC HMIS server becomes obsolete and needs a technology upgrade. Should this need arise, the HMIS System Administrator, on behalf of the vendor, will obtain the written permission of the Executive Management of each participating agency to perform the decryption and subsequent database conversion to a new technology.

Anti-virus protection

All participating agency computers and networks must have up-to-date anti-virus software installed for protection.

The anti-virus software should be updated regularly to maintain maximum protection from the most recent released viruses. In addition, Agency Administrators should update and install the latest security patches for their operating system which are available from the manufacturer.

The vendor will take all necessary precautions to prevent any destructive or malicious program (virus) from being introduced to SBC CoC HMIS. The vendor will ensure the following:

- Antivirus software (i.e.: Norton Anti-Virus) and live updates are scheduled regularly, and
- Real-time virus scan is enabled.

Violations

Introduction

This section provides information about San Bernardino County Continuum of Care (SBC CoC) Homeless Management Information System (HMIS) violations.

Right to deny access

The HMIS System Administrator has the right to deny user access to the SBC CoC HMIS if a user has violated any of the policies in this system manual. Any user suspected of violating a policy may be subject to suspension of user privileges until the violation can be resolved.

If deemed necessary for the immediate security and safety of SBC CoC HMIS data, the HMIS System Administrator has the right to deny or revoke user access to SBC CO CoC HMIS. The executive leadership of the non-profit organization will resolve the violation of any security protocols. If the executive leadership of the non-profit organization does not take action to resolve the violation, OHS will report to the CoC governance board.

Reporting a violation

HMIS users must report security violations to the HMIS System Administrator.

All HMIS users are obligated to report suspected instances of noncompliance. The Agency Administrator must report violations to the HMIS System Administrator. The HMIS System Administrator will review policy violations and recommend corrective and/or disciplinary actions.

Possible sanctions

OHS will investigate all potential violations of any security protocols and may sanction any user found to be in violation. Both the agency and/or user may be sanctioned accordingly.

Sanctions by OHS include, but are not limited to:

- Disable account in question,
- Advise the HMIS participating agency of the violation, and
- Ensure the agency takes appropriate action.

Grievances

Introduction   This section provides information regarding San Bernardino County Continuum of Care (SBC CoC) Homeless Management Information System (HMIS) grievances.

Client grievance process   Clients have the right to file a grievance with the participating agency in which they have a grievance. Participating agencies will report all client grievances to the San Bernardino County Office of Homeless Services (OHS).

Each participating agency is responsible for answering questions and responding to grievances from its own clients regarding SBC CoC HMIS. After a client has filed a SBC CoC HMIS related complaint with the participating agency, the participating agency must follow the process below:

Stage	Description
1	Participating agency sends written notice of the grievance and response to OHS. **Note:** The participating agency must keep all grievances and responses on file at the agency site.
2	HMIS System Administrator records all grievances and reports them to the appropriate SBC CoC committee.
3	Appropriate action will be taken by the HMIS System Administrator as required by the appropriate SBC CoC committee.

The SBC CoC has overall responsibility for local SBC CoC HMIS effectiveness and will respond to correct the issue when:

- Users and/or participating agencies fail to follow the terms set forth in the following:
    - SBC CoC HMIS Policies and Procedures System Manual,
    - HMIS Participating Agency Memorandum of Understanding (MOU), and/or
    - End-User Request Form.
- The following occurs:
    - A breach of client confidentiality, or
    - Intentional misuse of client data.

Agency grievance process   Participating agencies will report all agency-generated SBC CoC HMIS related grievances to OHS. If the grievance is related to a problem with SBC CoC HMIS, it must be reported to the HMIS System Administrator. Corrective action will be taken if system-wide changes are warranted.

For SBC CoC HMIS to serve as an adequate tool for agencies and provide a more accurate picture of the region's homelessness, any grievances related to problems with SBC CoC HMIS must be addressed by the agency in conjunction with OHS to achieve the goal of affecting systemic change where necessary.

Acknowledgement

I acknowledge that I have received a written copy of the San Bernardino County Continuum of Care (SBC CoC) Homeless Management Information System (HMIS) Policies and Procedures Manual. I understand the terms of SBC CoC HMIS Policies and Procedures and I agree to abide by them.

Agency Name: _____

Printed Name: _____

Signature: _____

Date: _____