Butte Countywide Homeless Continuum of Care

Homeless Management Information System / Coordinated Entry Committee
Monday, October 9, 2023 1:00 p.m. – 3:00 p.m.
Butte County Employment and Social Services – Zoom Virtual Meeting
Zoom Link: https://us02web.zoom.us/j/88923418561?pwd=RjVEM1phOHZHWU1WUy9ZYWE3SG1Jdz09
Phone: (669) 900-9128 Meeting ID: 889 2341 8561 Passcode: 980593

HMIS/CE COMMITTEE MEMBERS (CHO Administrator, or designee):

Angie Little, HACB
Codie McCormack, Caminar
Nancy Jorth, Youth for Change
Susan Wilson, Safe Space
Stephan Spirk, CAA
Yesenia Gallgos, CHAT
Cynthia Pesheck, Ampla
Cathryn Carhuff, Home & Heart
Trish Pittman, Health Net
Rayna Bryson, DESS HSP
Keesha Hills, OSCIA
Shelly Watson, Jesus Center
Tracey Gilliham, Butte 211
Rocio Nakao, BCDBH
Ann Winters, Catalyst
Debbie Villasenor, Consultant
Elisa Rawlinson, DESS HHOME
Jaymee McLaughlin, CUSD
Kristopher Kuntz, Anthem Blue Cross
Karen Ramirez, True North Housing Alliance
Lynann Pillay, Oroville Rescue Mission
Sara Sweaney, Nation's Finest
Nick Fashing, DESS APS
Meagan Smith, Northern Circle Indian Housing Authority
Tony Shafer, VECTORS
Maisue Thao, Butte College

First Chairperson: Elisa Rawlinson, DESS HH **Second Chairperson:** Sarah Frohock, BCDBH

AGENDA

1. Call to Order — Elisa
2. Approval off Minutes - ***ACTION*** — All
   a. HMIS/CES Committee Meeting, October 11, 2023
3. Introductions/Agency Updates — All
4. Training — Elisa
   a. 2024 HMIS Data Standards
5. New Policy and Procedure - ***ACTION*** — All
6. Next Meeting: Monday, November 6, 2023; 1:00 – 3:00 p.m.
7. Adjourn

Butte Countywide Homeless Continuum of Care

BUTTE COUNTYWIDE HOMELESS CONTINUUM OF CARE HMIS/CES COMBINED COMMITTEE MEETING MINUTES

MONDAY September 11, 2023 at 1pm-3pm
Zoom Meeting

COMMITTEE MEMBERS PRESENT:
Tracey Gilliham, Butte/Glenn 211
Shelly Watson, Jesus Center
Keesha Hills, OSCIA
Jaymee McLaughlin, CUSD
Debbie Villasenor, Housing Consultant
Stephan Spirk, CAA
Elisa Rawlinson, DESS HHome
Rayna Bryson, DESS
Yesenia Gallegos, CHAT
Maisue Thao, Butte College
Angie Little, Housing Authority – Butte County

COMMITTEE MEMBERS NOT PRESENT:
Carolina Cruz, Catalyst
Nick Fashing, DESS APS
Sara Sweaney, Nation's Finest
Rocio Nakae, BCDBH
Lynann Pilley, Oroville Rescue Mission
Sarah Frohock, BCDBH
Cynthia Pesheck, Ampla
Cathryn Carkhuff, Home and Heart
Karen Ramirez, True North Housing
Kristopher Kuntz, Anthem
Codie McCormack, Caminar
Susan Wilson, Safe Space
Nancy Jorth, Youth For Change
Trish Pittman, Health Net
Meagan Smith, Northern Circle IHA
Rachel DeLeon, DESS
Cecily Kishbaugh, VECTORS

OTHER ATTENDEES:
Javi Pineda, HACB
Shelly Storkan, BCDBH
Isabel Alaniz, DESS HHome
Troy McClanahan, DESS HHome
Lorena Reed, BCDBH
Erin Spasbo, DESS HHome
Wendy Lo, DESS HHome
Briana Harvey-Butterfield, DESS HHome
Samantha Raschka, Ampla
Erin Murray, DESS HHome
Pahua Thao, DESS HHome
Dee Price, DESS HHome
Kenny Huenink, DESS HHome

Recording Secretary: Lisa Angle

Draft

1. **CALL TO ORDER:**

Meeting called to order by Elisa Rawlinson, Chairperson at 1:03pm.

2. **APPROVAL OF MINUTES - ACTION**:
   a. HMIS/CES Committee Meeting, August 14, 2023

Motion - approve meeting minutes for August 14, 2023 with the following update to bullet #9 in agenda item #3 Introductions/Agency updates

- Shelly Storkan, BCDBH announced 15 No Place Like Home Units are available, names are being pulled off CE and direct referrals are being used for those units. If anyone is working with any clients with Mental Health Issues please refer.

to

- Shelly Storkan, BCDBH announced 15 No Place Like Home Units are available at Prospect View, names are being pulled off CE and direct referrals are being used for those units. If anyone is working with any clients with Mental Health Issues please refer.

Motion: Stefan Spirk
Second: Debbie Villasenor
Opposed: None
Abstained: None

3. **INTRODUCTIONS/AGENCY UPDATES:**

Introductions made by everyone in attendance with a few announcements.

4. **TRAINING MANUAL - DISCUSSION**

Elisa Rawlinson, Chairperson stated the draft HMIS Training manual is available in the agenda packet and will be available on the CoC website for anyone who would like to access. The HMIS training manual provides the basic uses of HMIS.

5. **TRAINING:**
   a. **2024 HMIS Data Standards Updates (Training Site)**
   b. **Updated 2024 HMIS Enrollment Forms**
   c. **New HMIS Program Request Form**

Elisa Rawlinson, Chairperson reviewed and explained the 2024 HMIS Data Standard updates for Client Profile, Project Enrollment, Current Living Situation Assessment, Status Assessment, Project Exit and Revision History in the Clarity Training Site.

Elisa Rawlinson, Chairperson reviewed the updated 2024 HMIS Enrollment Forms and the New HMIS Program Request Form.

Draft

6. HMIS POLICY & PROCEDURE UPDATE

Elisa Rawlinson, Chairperson stated the HMIS Policy and Procedures is being updated and will be available for committee members to review and make suggested changes. If a committee member is interested in reviewing a section of the Policy and Procedures let Elisa know.

7. NEXT MEETING:

Monday October 9, 2023 1:00pm – 3:00pm.

7. ADJOURN:

Meeting adjourned at 2:15pm.

Draft

From: DESS - HMIShelp
To: DESS - HMIShelp
Subject: HMIS Changes Coming and 2024 HUD HMIS Data Standards
Date: Thursday, September 28, 2023 12:39:51 PM
Importance: High

Good afternoon,

I am writing you to let you know about some upcoming changes to HMIS. As you may be aware, HUD updates their HMIS Data Standards every two years. Approximately 5 months ago, HUD released their 2024 HMIS Data Standards, which you can find here, if you are interested in a little 'light' reading. These data standards go into effect on October 1, 2023.

Our team is currently working on updating our training site and live site to comply with the 2024 Data Standards. Currently, our local HMIS has a little over 110 currently active projects/programs. We also have projects/programs that are contained in the back end of the system that are non-HMIS participating programs, that we still have to track within HMIS per HUD rules. Additionally, we currently have 144 active HMIS users across the county. Our system is growing! While this is great news for our community and the clients we serve, it means there is a lot of work happening in HMIS every day, and this system update is a big job. We are working diligently to update the system; however, this update will not happen overnight.

HMIS Users and Contributing HMIS Organization Administrators (CHO Admin) will start to see changes to enrollment, status and exit pages over the next month. I want to be sure everyone is aware of the coming changes and will be able to gather and enter the necessary information. Some of the changes that we are working on are changes that all users will see, some are changes that will only effect users of certain programs, and many of the changes are in the backend of the system that users will never see.

Please see below for upcoming changes that users will see:

1. **"Client Refused" will be updated to "Client Prefers Not to Answer"**

2. **Race and Ethnicity (still choose all that apply)**
    a. "Hispanic/Latina/e/o" will no longer be a separate option.
    b. A new option will be available "Middle Eastern or North African"
    c. A new text line will be added "Additional Race and Ethnicity Detail", allowing clients to provide more information if they'd like (e.g., "Puerto Rican", "Iranian", etc.)

3. **Gender options are changing** (still choose all that apply).
    a. Select
    b. Woman (Girl, if child)
    c. Man (Boy, if child)
    d. Culturally Specific Identity (e.g., Two-Spirit)
    e. Transgender
    f. Non-Binary
    g. Questioning
    h. Different Identity – if this option is chosen a text line will appear entitled, "If Different Identity, Please Specify", to track the client's identity.

4. **Destination**
    a. If the option "Rental by client, with ongoing housing subsidy" is chosen an additional drop-down field will appear "Rental Subsidy Type" users will be required to choose one of the following options:
        i. Select
        ii. GPD TIP housing subsidy
        iii. VASH Housing subsidy
        iv. RRH or equivalent subsidy
        v. HCV voucher (tenant or project based) (not dedicated)
        vi. Public Housing Unit
        vii. Rental by client, with other ongoing housing subsidy
        viii. Family Unification Program Voucher (FUP)
        ix. Foster Youth to Independence Initiative (FYI)
        x. Permanent Supportive Housing
        xi. Other permanent housing dedicated for formerly homeless persons.

5. **Prior Living Situation** (Where did the client sleep the night prior to entry into the program)
    a. If the option "Rental by client, with ongoing housing subsidy" is chosen an additional drop-down field will appear "Rental Subsidy Type" users will be required to choose one of the following options:
        i. Select
        ii. GPD TIP housing subsidy
        iii. VASH Housing subsidy
        iv. RRH or equivalent subsidy

v. HCV voucher (tenant or project based) (not dedicated)
vi. Public Housing Unit
vii. Rental by client, with other ongoing housing subsidy
viii. Family Unification Program Voucher (FUP)
ix. Foster Youth to Independence Initiative (FYI)
x. Permanent Supportive Housing
xi. Other permanent housing dedicated for formerly homeless persons.

b. Prior Living Situation will not cascade from program to program and agency to agency. This means if a user is enrolling a client into a program, and the client has already provided information to other HMIS participating programs within the last 365 days, the prior information will cascade (or roll) into the new program enrollment. This enables users to confirm the information is still correct, without having to regather information a client/household has already provided. However, the Prior Living Situation information will not cascade (or roll) and will have to be gathered from clients/households at every program enrollment.
c. Prior Living Situation questions will no longer be visible on Program Status screens or on Program Exit pages.

6. **"Approximate Date Homelessness Started" is being updated to "Approximate date this episode of homelessness started".**

7. **Health Insurance**
   a. The display name for the "Veteran's Administration (VA) Medical Services" is being updated to "Veteran's Health Administration (VHA)".
   b. Starting January 1, 2023, the "Medi-Cal Type" field will have the additional option of "Partnership" added to the drop down.

8. **Domestic Violence**
   a. The display name for "Victim of Domestic Violence" is being updated to "Survivor of Domestic Violence."
   b. The display name for "Last Occurrence of Domestic Violence" is being updated to **"**When experience occurred".

9. **Current Living Situation**

a. If the option “Rental by client, with ongoing housing subsidy” is chosen an additional drop-down field will appear “Rental Subsidy Type” users will be required to choose one of the following options:
    i. Select
    ii. GPD TIP housing subsidy
    iii. VASH Housing subsidy
    iv. RRH or equivalent subsidy
    v. HCV voucher (tenant or project based) (not dedicated)
    vi. Public Housing Unit
    vii. Rental by client, with other ongoing housing subsidy
    viii. Family Unification Program Voucher (FUP)
    ix. Foster Youth to Independence Initiative (FYI)
    x. Permanent Supportive Housing
    xi. Other permanent housing dedicated for formerly homeless persons.

10. **Wellbeing**
    a. All questions associated with this section are being retired and will be removed from any program currently using them.
        i. "Client perceives their life has value and worth”
        ii. “Client perceives they have support from others who will listen to problems”
        iii. “Client perceives they have a tendency to bounce back after hard times”
        iv. “Client’s frequency of feeling nervous, tense, worried, frustrated, or afraid”

11. **Translation Assistance** (This will be added to every program enrollment page and will be a required field).
    a. A Translation Assistance Needed picklist field is being created. A space will be added below Enrollment Start. Below the space, a label saying “Translation Assistance Needed” will be added. Below the label, Translation Assistance Needed a drop-down field will be added, with the following options.
        i. Select
        ii. No
        iii. Yes
        iv. Client Doesn’t Know

v. Client Prefers Not to Answer
vi. Data Not Collected

b. If "yes" is chosen in the "Translation Assistance Needed" dropdown, a new Preferred Language drop down will appear. The field will have the following picklist options:
   i. Select
   ii. American Sign Language
   iii. Cantonese
   iv. Chinese
   v. Dari
   vi. English
   vii. Filipino
   viii. Hmong
   ix. Ilocano
   x. Laotian
   xi. Mandarin
   xii. Mien
   xiii. Pashto
   xiv. Punjabi
   xv. Russian
   xvi. Spanish
   xvii. Tagalog
   xviii. Different Preferred Language
   xix. Client Doesn't Know
   xx. Client Prefers Not to Answer
   xxi. Data Not Collected
c. If "Different Preferred Language" is chosen a text field entitled "If Different Language, please specify" will appear so users can track the client's preferred language**.**
d. Please note, if agencies identify a language that is not included above, and multiple clients are in need of translation assistance, email HMIShelp@buttecounty.net and staff will update the drop down to include that language.

12. **Housing Assessment at Exit**
    a. "Client went to jail/prison" is being updated to "Jail/prison"
    b. "Client died" is being updated to "Deceased"

13. **Sexual Orientation**
    a. This will be in even Project Enrollment screen and will be

found at the bottom of the screen below the "Health Insurance" question. Options will be:

i. Select
ii. Heterosexual
iii. Gay
iv. Lesbian
v. Bisexual
vi. Questioning/Unsure
vii. Other
viii. Client doesn't know
ix. Client prefers not to answer
x. Data not collected

b. If "other" is chosen, a text field entitled "Other Sexual Orientation" will appear so users can track the client's sexual orientation.

14. **RHY Service Connections**
    a. Service Items field "Post-natal care for mother" is being updated to "Post-natal care for client (person who gave birth)."

15. **RHY Project Completion Status**
    a. The drop-down options for Project Completion Status are being updated as follows:
        i. "Youth voluntarily left early" to "Client voluntarily left early"
        ii. "Youth was expelled or otherwise involuntarily discharged from project" to "Client was expelled or otherwise involuntarily discharged from project"

16. **RHY Counseling**
    a. "Counseling received by client" is being updated to "Client received counseling".

17. **Veteran Information**
    a. "Space Force" is being added to the "Branch of Military" drop down.

18. **Services Provided – SSVF**
    a. "Extended Shallow Subsidy" is being updated to "Shallow Subsidy."

19. **Financial Assistance – SSVF**
    a. The picklist options for VA SSVF Service - Financial Assistance (si_cat_2700_3000) are being updated as follows:
    b. "Extended Shallow Subsidy - Rental Assistance" to "Shallow Subsidy Financial Assistance."
    c. Two new responses are being added:
        i. Landlord Incentive
        ii. Tenant Incentive
    d. When a user provides a VA SSVF Financial Assistance service item to a client:
        i. For Long Term and Daily Attendance service items, the start and end dates will be labeled Start Date of Financial Assistance and End Date of Financial Assistance respectively.
        ii. For Single Event service items, the event date is labeled Event Date of Financial Assistance.
        iii. For Multiple Attendance, the date is labeled Date of Financial Assistance.

20. **Percent of AMI (SSVF Eligibility)**
    a. The picklist options for Percent of AMI are being updated to the following:
        i. 30% or less
        ii. 31% to 50%
        iii. 51% to 80%
        iv. 81% or greater

21. **SSVF Last Permanent Address**
    a. This element is being retired and is being removed from all screens:
        i. Prior Street Address
        ii. Prior City
        iii. Prior State
        iv. Zip Code of Last Address
        v. Prior Address Data Quality

22. **SSVF HP Targeting Criteria**
    a. The display names for dependent are being updated as follows:
        i. "History of literal homelessness" will be updated to

"Past experience of homelessness"

ii. "Head of Household is not a current leaseholder" will be updated to "Head of Household is not a current leaseholder/renter of unit"

iii. "Head of household (HoH) never been a leaseholder" will be updated to "Head of Household has never been a leaseholder/renter of unit"

iv. "Single parent household with minor child(ren)" will be updated to "Single parent/guardian household with minor child(ren)"

As always, if you have any questions please connect with your agency's CHO Admin, or email HMIShelp@buttecounty.net. Thank you all for understanding that it will take time to roll out these changes/updated. If you don't see the updates listed above in your agency's programs by November 1, 2023, please let us know.

Elisa Rawlinson
Senior Health and Human Services Program Analyst
Housing and Homeless
Butte County Department of Employment and Social Services
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HMIS Policies and Procedures Manual

Butte Countywide Homeless Continuum of Care

For use by the CoC Council, CoC Coordinator, HMIS Committee, HMIS Lead Agency, HMIS Software System Provider, Contributing HMIS Organizations, CHO Agencies, and all End Users

Created September 20, 2023

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Background

In accordance with Congressional requirements, the U.S. Department of Housing and Urban Development (HUD) requires the development and maintenance of a local Homeless Management and Information System (HMIS) for all communities receiving Homeless Assistance Grants and organized as a Continuum of Care (CoC).

HMIS is an electronic data collection system designed to store longitudinal consumer-level data about the people accessing homeless services in a CoC. With the ability to integrate and de-duplicate data from all homeless assistance and homelessness prevention programs in a community, it can provide the means to understand the size, characteristics, and needs of a community's homeless population.

HUD uses HMIS data to inform homeless policy at the federal, state, and local levels. The HEARTH Act, enacted in 2009, requires that all recipients and sub-recipients of the CoC Program and Emergency Solutions Grant ("ESG") funds participate in their CoC's HMIS. The CoC Interim Rule (24 CFR 578) defines CoC HMIS responsibilities, including:

1) Selecting an HMIS software solution
2) Designating an eligible applicant to manage HMIS (the HMIS Lead Agency)
3) Providing oversight for key HMIS policies
4) Working with the HMIS Lead Agency to ensure consistent provider participation
5) Ensuring the quality of HMIS data

In addition, HMIS Proposed Rule (76 FR 22 76917) includes more specific HMIS requirements, including: the duties of the CoC; the duties of the HMIS Lead Agency; and security, data quality, privacy, and technical standards.

With the exception of Victim Service Providers defined by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA), all homeless assistance programs that are a part of the CoC must participate in HMIS, whether or not the specific program receives direct funding from HUD or other federal agencies. A particular program (or part of a program, such as a subset of beds within a program) is considered "participating" in HMIS if, as a matter of general practice, the program makes reasonable efforts to record all the Universal Data Elements for all clients served and discloses these data elements to the HMIS Lead Agency at least once annually. Disclosure may occur by directly entering data in HMIS, electronically transferring data to the HMIS Lead Agency, or through other means determined by the HMIS Lead Agency. Such an HMIS participant is called a "Contributory HMIS Organization (CHO)" in these HMIS Policies and Procedures.

A Continuum of Care is a group composed of representatives of organizations, including nonprofit providers of homeless services, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, veterans service providers, mental health agencies, hospitals, universities, affordable housing developers and law enforcement, that serve homeless and formerly homeless persons and that carry out the responsibilities delegated to a Continuum of Care under HUD's regulations for a particular community. A Continuum of Care is ultimately responsible for oversight and guidance of HMIS. A Continuum of Care is also responsible for oversight of the security of the data and any public use of the data.

The Butte Countywide Homeless Continuum of Care (Butte CoC) Governance Charter, adopted by the Butte CoC Council, requires that the Butte CoC designate a legal entity that is also a Continuum of Care Program eligible applicant to serve as the HMIS Lead Agency. The HMIS Lead Agency maintains Butte County's HMIS in compliance with HUD standards and coordinates all related activities, including training, maintenance, and the provision of technical assistance to CHOs. In 2020, the Butte CoC, entered into an agreement with the Butte County Department of Employment and Social Services, to serve as the HMIS Lead Agency. More specific HMIS Lead Agency responsibilities are described in the HMIS Lead Agency Memorandum of Understanding (MOU)

between the Butte County Department of Employment and Social Services (DESS) and the Butte CoC. In all HMIS governance decisions, the Butte CoC will balance the interests and needs of all HMIS stakeholders, including homeless men, women, and children, service providers, and policymakers.

The Butte CoC *HMIS Policies and Procedures Manual* was created to outline how the Butte CoC will comply with the following regulations, standards, and agreements: the HEARTH Act; CoC Interim Rule; HMIS Proposed Rule; HUD Data Standards; Butte CoC Governance Charter; and HMIS Lead Agency MOU.

This document should, at a minimum, reflect the baseline requirements listed in the HMIS Data and Technical Standards Final Notice, published by HUD in July 2004 and revised in March 2010. All HMIS End Users are required to read and comply with the HMIS Data and Technical Standards. Failure to comply with the HUD standards carries the same consequences as failure to comply with these Policies and Procedures. In any instance where these Policies and Procedures and Security Plan are not consistent with the HUD HMIS Standards, the HUD Standards take precedence. Should any inconsistencies be identified, please immediately notify the HMIS Lead Agency.

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

HMIS Lead Agency Information

Butte County Department of Employment and Social Services (DESS)
205 Mira Loma Drive, Suite 50
Oroville, CA 95965
HMIShelp@buttecounty.net

HMIS Contact Information	Contact Reason
Elisa Rawlinson Senior Health and Human Services Analyst erawlinson@buttecounty.net (530) 552-6204	1. HMIS Lead for the Butte CoC.
HMIS Inbox HMIShelp@buttecounty.net	1. Requests for new agency access, new user access, new programs, deactivation of users, etc. 2. Requests for support related to data quality and management. 3. General technical support for HMIS issues related to user access, troubleshooting, information requests, system functionality errors, etc. 4. Training 5. Requests for issues related to data quality, management and/or mandated reports, report failure, etc. 6. Requests for issues related to mandated reports, report failure, etc.

HMIS Terminology and Definition of Terms

Annual Homeless Assessment Report (AHAR): HUD's annual report to Congress on the nature and extent of homelessness nationwide.

Annual Performance Report (APR): The AHAR is the annual report that HUD submits to the U.S. Congress. The report provides nationwide estimates of homelessness, including information on the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The report is based primarily on HMIS data. (Formerly known as the Annual Progress Report).

Butte CoC Council: The Butte CoC's governing body charged by the Butte CoC Governance Charter with planning and implementing HUD-funded efforts to end homelessness in Butte County.

Butte CoC Governance Charter: The document that governs the roles, responsibilities and operations of the Butte CoC, Council, Committees, Lead Agency, Collaborative Applicant, and HMIS Lead Agency

CHO HMIS Administrator: A CHO staff person who is responsible for compliance with the CHO Participation Agreement and day-to-day operation of CHO data collection in HMIS.

CHO Memorandum of Understanding (MOU): An agreement, Memorandum of Understanding (MOU), entered into by the HMIS Lead Agency and CHO that describes the obligations and authority of the parties with regard to data collection, input, management and reporting.

Chronically Homeless (CH): According to HUD definition, a chronically homeless individual is a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, in an emergency shelter, or in an institutional care facility. The individual must have been living in any of the above-described places either continuously for at least 12 months or on at least 4 separate occasions in the last three years. Chronically homeless families are families with adult heads of households who meet the definition of a chronically homeless individual. If there is no adult in the family, the family would still be considered chronically homeless if the minor head of household meets all the criteria of a chronically homeless individual.

Client: A living individual about whom a Butte COC/CHO collects or maintains protected personal information: (1) because the individual is receiving, has received, may receive, or has inquired about services from a Butte COC/CHO: or (2) in order to identify service needs, or to plan or develop appropriate services within the CoC.

Continuum of Care (CoC): The primary decision-making entity defined in the funding applications to HUD as the official body representing a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency.

Contributory HMIS Organization (CHO): An organization that enters data into the HMIS Software System in compliance with the CHO Participation Agreement and under the oversight of a CHO HMIS Administrator.

Coordinated Entry System (CES): Coordinated entry is a consistent, community wide intake process that is used to match people experiencing homelessness to existing community resources that are the best fit for their situation. Coordinated assessment maximizes the use of available resources and minimizes the time and frustration people spend while trying to find assistance. It also identifies and quantifies housing and service gaps and thereby enables effective and efficient systems planning.

Emergency Shelters (ES): An emergency shelter is a place for homeless people to live temporarily. Most emergency shelters provide shelter for a specific time-period e.g. 90 days after which the individual or family is expected to vacate it.

End User: An employee, volunteer, affiliate, associate, and any other individual acting on behalf of a CHO or

HMIS Lead Agency who uses or enters data into HMIS or another administrative database from which data are periodically uploaded to HMIS.

Homeless Management Information System (HMIS): The information system designated by a CoC to process Protected Personal Information (PPI) and other data in order to create an unduplicated accounting of homelessness within the CoC. An HMIS may provide other functions beyond unduplicated accounting.

HMIS/CES Committee: Committee established by the Butte CoC Council to provide support and recommendations to the Butte CoC Council regarding HMIS policies and procedures, processes and system; composed of staff representing the Butte CoC, the HMIS Lead Agency, and all CHO HMIS Administrators.

HMIS Software System: A HMIS data management software program developed and serviced by a HMIS Vendor.

HMIS Lead Agency: An organization designated by a CoC to operate the CoC's HMIS.

HMIS Vendor: Contractor who provides support services for the operation of a CoC's HMIS by contract, including the HMIS Software System provider, web server host, as well as providers of other contracted information technology or support.

Homeless Assistance Program: A program whose primary purpose is to meet the specific needs of people who are literally homeless. Homeless assistance program include outreach, emergency shelter grant, transitional housing, rapid re-housing, permanent housing and permanent supportive housing.

Homeless Prevention Program: A program whose primary purpose is to meet specific needs of people who are at risk of homeless. Homelessness preventions programs include those funded by HPRP and other homelessness prevention programs identified by the CoC as part of its service system.

Housing First: Housing First is an approach to address homelessness. In the last few years, Housing First has become one of the most popular models for serving chronically homeless people. This approach is based on the understanding that homelessness is primarily a lack of housing and the fastest way to help a person out of homelessness is to provide that person with housing. The housing first approach focuses on providing housing as quickly as possible and subsequently providing services as needed and desired by the program participants. Permanent Supportive Housing and Rapid Rehousing programs are based on the Housing First Model.

Housing Inventory Count (HIC): The HIC provides information about all of the beds and units in a Continuum of Care homeless system.

HUD Veterans Affairs Supportive Housing Program (HUD-VASH): The HUD-VASH program combines HUD's Housing Choice voucher (HCV) – rental assistance for homeless veterans and their families with case management and clinical services provided by the Department of Veterans Affairs (VA) at its medical centers and in the community.

Literally Homeless: As per HUD definition, a literally homeless individual or family is an individual or family who lacks a fixed, regular and adequate nighttime residence. The individual's or family's primary nighttime residence is a public or private place not meant for human habitation. Or the individual or family is living in a publicly or privately operated shelter or is exiting an institution where (s) he has lived for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering the institution.

Longitudinal System Analysis (LSA): The LSA report, produced from a CoC's HMIS and submitted annually to HUD, and provides HUD and Continuums of Care (CoCs) with critical information about how people experiencing homelessness use the system of care.

Notice of Funding Availability (NOFA): Each year the U.S. Department of Housing and Urban Development (HUD) releases a NOFA signifying the beginning of a funding competition among approximately 450 Continuums of

Care (CoCs). HUD also releases a NOFA for the CDBG and HOME programs.

Permanent Supportive Housing (PSH): Permanent Supportive Housing program provides permanent housing and supportive services to chronically homeless individuals and families. The target population for permanent supportive housing program are chronically homeless individuals with a disability. The program focuses on the population that has high acuity and high costs. The program provides rental subsidy, intensive case management and health care (including behavioral health) to the program participants. There is usually no time limit for the program. PSH has been seen to have a high impact on housing stability.

Personal Identifying Information (PII): Protected Identifying Information.

PIT: Point-in-Time Count refers to the Homeless Census and Survey that is undertaken every two years in the last ten days of January. It is mandatory for all jurisdictions receiving funding from HUD to undertake the Point-in-Time Count. The data gathered from the count helps the County and local homeless service providers to better understand the needs of the community, evaluate the current system of services, and apply for federal and local funding.

Protected Personal Information (PPI): Information about a consumer: (1) whose identity is apparent from the information or can reasonably be ascertained from the information; or (2) whose identity can, taking into account any methods reasonable likely to be used, be learned by linking the information with other available information or by otherwise manipulating the information.

Program: A program (or *Project* in the HMIS Data Standards) provide the framework for HMIS data collection and reporting. The programs available to a user will depend on agency and staff member settings.

Program Specific Data Elements (PDE): To meet the statutory and regulatory requirements of federally funded programs using HMIS, additional elements are required for different funding sources. The Program Specific Data Elements are elements that are required by at least one of the HMIS Federal Partner programs. Some of the program specific data elements are collected across most Federal Partner programs. These are called "Common" Program Specific Data Elements. Local CoCs may elect to require *all* continuum projects participating in HMIS to collect a subset of the data elements contained in this section to obtain consistent information across a range of projects that can be used to plan service delivery, monitor the provision of services, and identify client outcomes.

Rapid Re-Housing (RRH): Rapid rehousing is an intervention that has been seen to be a successful model in addressing the issue of homelessness in different parts of the country. There are three core-components of rapid rehousing– 1. Housing identification, 2. Move-in and rent assistance and 3. Rapid rehousing case management and services. The clients are provided shallow or declining rent subsidy, other temporary financial assistance and time-limited case management. It has been observed that rapid rehousing helps individuals and families to quickly exit homelessness, return to housing in the community and not become homeless again in the near future.

Service: Services provide a way to record the assistance provided to clients, from one-time events like utility assistance to daily services like meals and shelter. Services can be provided at the client and household level or to groups of clients.

Transition Age Youth (TAY): Transition Age youth are young people between the age of 16(or 18) and 24 who are in transition from state custody or foster care and are at-risk. When they turn 18, they can no longer receive the services.

Transitional Housing (TH): Transitional housing is temporary, supportive housing for people. Transitional housing is generally provided for a limited time period –from 2 weeks to 24 months.

Universal Data Elements (UDE): HMIS Universal Data Elements are elements required to be collected by all projects participating in HMIS, regardless of funding source. Projects funded by any one or more of the

federal partners must collect the Universal Data Elements, as do projects that are not funded by any federal partner (e.g. missions) but have agreed to enter data as part of the Continuum of Care's HMIS implementation. The Universal Data Elements 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.

U.S. Department of Housing and Urban Development (HUD): The federal government's Department of Housing and Urban Development. HUD determines rules and regulations related to CoCs and HMIS.

Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT): The VI-SPDAT is a part of the coordinated assessment process. The tool is used at the time of intake. It considers the household's situation and identifies the best type of housing/supportive services intervention to address the household's situation.

HMIS Overview

The long-term vision of HMIS is to enhance CHOs' collaboration, service delivery, and data collection capabilities by sharing information. Accurate information will place the Butte CoC in a better position to request funding from various sources and assist in more strategic future planning. HMIS is designed to be an integrated network of homeless and other service providers that use a central database to collect, track, and report uniform information on client needs, programs, and services. This system not only meets Federal requirements but also enhances service planning and delivery.

A fundamental goal of HMIS is to document the demographics of homelessness in Butte County according to the HUD HMIS directive. It is the goal of the Butte CoC to achieve an accurate count of the number of unhoused community residents, identify patterns in utilization of assistance, document the effectiveness of services, and to ensure equity of assistance for all clients and households served. This will be accomplished through analysis of data that is gathered from individuals and households experiencing homelessness and the service providers who assist them. Data gathered via intake interviews and program participation will be used to complete reports, including but not limited to, HUD Annual Performance Reports, Annual Homeless Assessment Reports, Longitudinal Systems Analysis, and Point-in-Time sheltered counts. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policymakers, service providers, advocates, and consumer representatives.

The local HMIS project utilizes a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the county. Access to HMIS is limited to agencies who have agreed to uphold these Policies and Procedures by executing a MOU with the HMIS Lead Agency, and then only to authorized staff members who meet the necessary training and security requirements.

Homeless individuals and case managers can benefit from HMIS as a result of improved service coordination. HMIS facilitates information sharing among case management staff within one agency and between agencies (with written client consent) who are serving the same clients.

Agencies serving homeless individuals and program managers can benefit from HMIS by obtaining access to aggregate information that can be used to develop a more complete understanding of clients' needs and outcomes. Such information can then be used to advocate for additional resources, to conduct evaluations of program services, and report to funding agencies such as HUD.

The Butte CoC and policymakers can benefit from HMIS, a county-wide use of a single shared data collection system that provides the capacity to generate reports required by HUD and other funding sources, and allows access to aggregate information that will assist in the identification of gaps in services, as well as informing policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

HMIS Software

The Butte CoC, through the HMIS Lead agency, contracts with Bitfocus, and uses their Clarity Human Services Case Management Software. This software system is compliant with the most recent HUD Data Standards and is capable of generating reports and unduplicated counts of services, which provide a statistical profile of homeless services and consumers. HUD HMIS data standards are updated every 2 (two) years, and Bitfocus, as one of the largest HMIS software systems in the United States, works closely with HUD to ensure compliance. Clarity is a web-enabled application residing on a central server to facilitate data collection by homeless service providers in various geographic locations.

Access to the central server is limited to those agencies formally participating in HMIS, including only authorized staff members who have met the necessary training and security requirements. In June, the HMIS/CES Committee agreed to an open HMIS system. Since that time all CHOs, with the exception of those who fall under HIPPA regulations, have been able to view a client's demographic, programmatic, and case management history of all other agencies that participate in the system. This allows for enhanced coordination of services between HMIS participating agencies and will assist the Butte CoC homeless service system to provide trauma informed care and collaboration in a new way.

HMIS Computer Requirements

CHOs commit to a reasonable program of data and equipment maintenance in order to sustain an efficient level of system operation. CHOs must meet the technical standards for minimum computer equipment configuration:

- Internet connectivity.
- Secure and maintain any computer systems, hardware, software, applications, and data that will be used in the performance of this MOU. This includes ensuring that all security patches, upgrades, and anti-virus updates are applied as appropriate to secure all information assets and date that may be used, transmitted or stored on such systems in the performance of this MOU.
- End Users must have workstation devices password protected screensavers set at no more than 15 minutes.
- Passwords shall not be shared or stored in a readable format on the computer, browser, , server, or on paper and must be immediately changed if revealed or compromised.
- Safeguard equipment to ensure non-HMIS users and public cannot access and/or view HMIS information. Safeguarding of equipment includes but is not limited to ensuring video terminals, printers, hard copy printouts or any other forms of HMIS related records are placed so that they may not be viewed by the public or other unauthorized persons.
- End Users must log out of HMIS if they leave their workstation.
- Written information pertaining to user access should not be stored or displayed in any publicly accessible location.
- Data Disposal: The CHO agrees to dispose of documents that contain identifiable consumer level data by shredding paper records, deleting any information from all equipment before disposal, and deleting any copies of consumer level data from the hard drive of any machine before transfer or disposal of property. Clarity takes advantage of the latest in web technologies. For both security and compatibility, it is extremely urgent that your local IT staff ensure all workstations are outfitted with the latest version of the web browser you use.

Internet Brower Requirements

Clarity Human Services requires an up-to-date web browser to access all of the software's features. To ensure the latest security features are in place, always use the latest version of a supported web browser when accessing Clarity Human Services.

Clarity supports the most recent version of the following web browsers:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Apple Safari

HMIS Guiding Principles

It is the primary governing principle of the Butte County HMIS that they system is intended to serve and protect the community's clients. A safe and secure HMIS system relies on the following guiding principles:

Confidentiality - The rights, privileges, and privacy of clients are crucial to the success of HMIS. Compliance with the Butte CoC *HMIS Policies and Procedures Manual* will help ensure client privacy without impacting delivery of services. Clients will be understood to be the owners of their own data. Each individual will have the right to grant informed consent, limit data sharing, or revoke consent related to his/her PPI at any time.

This must be the primary focus of agency programs participating in HMIS. Collection, access, and disclosure of consumer data through HMIS are only be permitted by the procedures set forth in this document, in compliance with the Data Privacy Plan, the client signed Informed Consent and, if applicable, HIPPA laws.

Data Integrity - Consumer data is the most valuable and sensitive asset of the HMIS. These policies are designed to ensure data integrity and protect information from accidental or intentional unauthorized modification, destruction, or disclosure. All End Users will strive for the highest possible degree of data quality. Data quality is a social justice issue because poor data quality can lead to reductions in funding and services, clients not being referred to the appropriate services to meet their needs, or improper findings of ineligibility.

System Availability - The availability of a centralized data repository is necessary to achieve the optimal type of aggregation of unduplicated homeless statistics across the county. The Butte CoC and the HMIS Lead are responsible for ensuring the broadest deployment and availability of the system for homeless service agencies.

Compliance - Violation of the policies and procedures set forth in this document, in the HMIS Lead Agency MOU, and in the End User Agreement will be taken very seriously. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity may result in the withdrawal of system access for the offending user and/or entity. The Butte CoC recognizes the need to maintain each consumer's confidentiality and will treat the personal data contained within the HMIS with respect and care. The HMIS Lead agency, HMIS participating agencies, and HMIS End Users have both an ethical and a legal obligation to ensure that data is collected, accessed and used appropriately. Of primary concern to the Butte CoC are issues of security (i.e. encryption of data traveling over the internet, the physical security of the HMIS server), and the policies governing the release of this information to the public, government and funders.

Roles and Responsibilities

Butte CoC Council

The Butte CoC Council is responsible for HMIS project oversight and implementation. This implementation includes but is not limited to; planning, administration, software use, managing HMIS data in compliance with HUD HMIS Standards, and reviewing and approving all policies, procedures, and data management plans governing CHOs. More specific Butte CoC Council responsibilities are listed below.

1) Designate a single information system as the official HMIS software for the geographic area.
2) Designate an HMIS Lead.
3) Approve all HMIS policies, procedures and operational agreements.
4) Develop and executing a Governance Charter which includes a requirement that the HMIS Lead enter into written HMIS MOU with each Contributing HMIS Organization (CHO) and such additional requirements as may be issued by notice from time to time.
5) Developing and implementing a strategic plan for HMIS participation, development and use in data driven decision making.
6) Using HMIS data to identify gaps in services to the homeless and promote solutions to local policy makers.
7) Educating and raising consciousness of the community about homelessness.

HMIS/CES Committee

The HMIS/CES Committee is designated by the Butte CoC Council to provide support and recommendations to the Butte CoC Council related to HMIS regulations and standards as set forth by HUD. The HMIS Committee consists of staff representing the Butte CoC and HMIS Lead Agency, and all CHO HMIS Administrators.

HMIS Lead Agency

The HMIS Lead Agency manages HMIS data in compliance with HUD HMIS Standards, collects and organizes HMIS data, and provides HMIS administrative functions at the direction of the Butte CoC Council, and as further described in the HMIS Lead Agency MOU. Other responsibilities include:

Governance, Policy Development and Reporting

1) Draft policies, procedures and standards in accordance with the CoC Interim Rule, Proposed HMIS Rule, and current HUD HMIS Data Standards;
2) Create and submit a security plan, data quality plan, and a privacy policy to the CoC for approval, to be updated as needed;
3) Developing HMIS plans, forms, standards and governance documents in compliance with all applicable regulations,
4) Ensure implementation and compliance of policies, procedures and standards;
5) Schedule and facilitate HMIS/CES Committee meetings;
6) Prepare data reports and analyses to the Butte CoC Council and for submission to HUD. Reports include but are not limited to:
    a. PIT Count;
    b. HIC;
    c. LSA;
    d. Unduplicated counts of clients served annually;

    e. Count of lodging units in the HMIS; and
    f. Other reports as necessary to measure progress in meeting Butte CoC goals;
7) Respond to the CoC Council and HMIS/CES Committee directives;
8) Ensure participation and compliance by all agencies and programs serving homeless people in HMIS;
9) Liaising with HUD regarding federal HMIS standards and regulations;

System Administration and Security

1) Serve as the applicant to HUD for grant funds to be used for HMIS activities in the CoC's geographic area, and enter into grant agreements with HUD to carry out HUD-approved activities, as further described in the HMIS Lead Agency MOU;
2) Oversee the day-to-day administration of the HMIS;
3) Manage the HMIS Software System Vendor and other HMIS Vendors in compliance with current HUD requirements and Proposed HMIS Rule technical standards;
4) Retain copies of all contracts and agreements executed for HMIS administration;
5) Designate the HMIS Lead as the Security Officer responsible for ensuring compliance with applicable security standards;
6) Keep all signed paper and electronic statements for a period of at least 3 years;
7) Implement a policy and chain of communication for reporting and responding to security incidents;
8) Develop a disaster recovery plan, which includes protocols for communication with staff, CoC and CHOs;
9) Complete an annual security review;

Software and Vendor

1) Liaising with HMIS software vendor(s);
2) Procuring HMIS software and licenses;
3) Overseeing software license administration;
4) Configuring HMIS software to meet Continuum of Care and/or CHO needs;
5) Maintaining HMIS web portal and resource library, including domain registration,

CHO and End User Coordination

1) Executing and maintaining copies of signed Memoranda of Understanding with CHOs,
2) Monitor and enforce CHO compliance with HUD requirements and report on compliance to the CoC and HUD;
3) Communicate HUD HMIS Standards updates to all CHO HMIS Administrators;
4) Prepare and execute MOU with each CHO, which include:
    a. The obligations and authority of the HMIS Lead Agency and CHO;
    b. The requirements of the Security Plan with which the CHO must abide;
    c. The sanctions for violating the Participation Agreement; and
    d. Agreement that the HMIS Lead Agency and CHO will process PII and PPI consistent with the agreement.
5) Maintain a contact list of all CHO HMIS Administrators and update CHO MOU as needed;
6) Manage and maintain mechanisms for soliciting, collecting and analyzing feedback from End Users and CHO HMIS Administrators.
7) Document technical issues experienced by End Users;

Training and Technical Assistance

1) Develop and deliver a comprehensive training curriculum and protocol for CHO HMIS

Administrators and End Users, as further described in the HMIS Lead Agency MOU;
2) Provide technical assistance and support to CHO HMIS Administrators and End Users;

Data Quality

1) Develop and implement a Data Quality Plan in coordination with the HMIS/CES Committee;
    a. Establish data quality benchmarks for CHOs (calculated separately for: emergency shelter, safe haven, transitional housing and permanent housing), including bed coverage rates, service-volume coverage rates, missing/unknown value rates, timeliness criteria, and consistency criteria;
2) Coordinate with CHO HMIS Administrators to produce required reports;
3) Work with CHO HMIS Administrators related to their programs' data quality reports indicating levels of data entry completion, consistency with program model, and timeliness;
4) Provide reports on HMIS participation rates, data quality and other analyses to the Butte CoC Council and HMIS Committee when requested;
5) Monitor compliance by all CHOs with HMIS participation requirements, policies and procedures, privacy standards, security requirements, and data quality standards through an annual review;
6) Manage HMIS Software System upgrades and ensure that they comply with the latest HUD Data Standards; and
7) Distribute HUD Data Standards and provide guidance to CHOs on compliance.

Contributing HMIS Organizations (CHOs)

CHOs operate program(s), provide services, and enter PII and PPI into HMIS. CHOs must enter into and comply with HMIS MOU, and agree to comply with all Butte CoC and HMIS/CES committee applicable plans, forms, standards and governance documents, in order to contribute data to the HMIS Software System. The HMIS MOU lays out the full responsibilities of the CHO and CHO Administrator, however the principle responsibilities are described below and include:

Privacy

1) Uphold confidentiality requirements;
2) Obtain a HMIS Client Informed Consent for each Client entered into the HMIS Software System;
3) Post the Butte Countywide HMIS Public Notice so that is viewable to all Clients;
4) Post the Butte Countywide Continuum of Care Privacy Notice on its Agency's website;

Security

1) Designate the CHO HMIS Administrator as the Security Officer that is responsible for ensuring Security Plan compliance for the CHO;
2) Conduct criminal background checks on the CHO HMIS Administrator and all End Users;
3) Ensure that all End Users receive security training prior to being given access to the HMIS, and a minimum of once annually;
4) Monitoring and maintaining security of all staff workstations used for HMIS data entry.
5) Ensuring End User adherence to workstation security policies.
6) Safeguarding client privacy through compliance with confidentiality and security policies
7) Will be subject to periodic on-site security assessments to validate compliance of the agency's information security protocols and technical standards.

Training

1) Ensure all CHO HMIS Administrators and End Users participate in comprehensive training

curriculum developed by the HMIS Lead Agency.
2) Ensure CHO HMIS Administrator and appropriate End Users attend and participate in HMIS/CES Committee meetings a minimum of once per quarter.

Data Quality

1) Collect the universal data elements, as defined by HUD, for all programs operated that primarily serve persons who are homeless or at risk of homelessness.
2) Collect program specific data elements, as defined by HUD, for all clients served by programs funded by HUD grants allocated to the Butte CoC.
3) Enter client-level data into the HMIS within three days of client interaction.
4) Follow, comply and enforce the CHO HMIS MOU.
5) Complete quarterly data compliance checks of agency HMIS programs.

CHO HMIS Administrator

A CHO HMIS Administrator is designated by each CHO to oversee day-to-day operation of its HMIS data collection system, ensure program-level data quality according to the terms of the CHO Participation Agreement and associated Data Quality Plan, and manage data entry into HMIS. The CHO HMIS Administrator shall:

1) Will submit to HMIS Lead all required forms for new end users, and will ensure CHO is complying with the Butte CoC HMIS Background policy, laid out in this document;
2) Be the first point of contact for end users experiencing difficulties using HMIS;
3) Maintain end user list within the CHO;
4) Monitor End User logins on a monthly basis;
5) Update the HMIS Lead agency 2 weeks prior to:
    a. A program funding source is ending, a new funding source is added;
    b. A program changes location;
    c. A program's bed and/or unit inventory changes.
6) Run data quality reports indicating levels of data entry completion, consistency with program model, and timeliness; a minimum of once quarterly;
7) Complete data entry when End Users are unable to complete data entry;
8) Ensure CHO compliance with the protocols of the Data Quality Plan, Security Plan and Privacy Plan;
9) Inform the HMIS Lead Agency when critical deadlines regarding data entry are missed;
10) Maintain communication with the HMIS Lead Agency and HMIS/CES Committee regarding HMIS data entry challenges and questions;
11) Submit requests for new end users of the HMIS Software System to the HMIS Lead Agency;
12) Notify the HMIS Lead Agency within one (1) business day when end user(s) when an End User is no longer employed by CHO and/or no longer needs access to HMIS, so their HMIS user account can be deactivated;
13) Complete training with the HMIS Lead Agency at least quarterly.
14) Attend an HMIS/CES Meeting at a minimum once per quarter.
15) Notify all end-users from their agency of system-wide changes and other relevant information;
16) Monitors their agency's compliance with standards of confidentiality and data collection, entry and retrieval;
17) Ensures Participating Agency adherence to HMIS Policies and Procedures; and
18) Makes continuous efforts to detect violations of privacy and security and respond to any indication or report of violations;
19) Inform HMIS Lead Agency within three (3) business days of changes in Bed and/or Units in any applicable program.

End Users

All HMIS End Users shall:

1) Read, initial and sign the End User Agreement;
    a. The user understands and agrees that they may not publish, disclose, or use any information collected for or contained within the HMIS except as permitted by the Butte CoC HMIS procedures or applicable by law.
    b. The user understands and agrees that all passwords and/or other security measures assigned to them are to be used solely by them, and are not to be disclosed to or utilized by any other individual.
    c. The user understands and agrees that if they violate the confidentiality provisions of applicable rules and regulations, they may be subject to termination and/or liability under applicable law.
    d. The user understands and agrees that their obligations under the agreement shall remain in effect following any termination of the agreement or of their employment with the agency listed on the form.
2) Complete a New User training with the HMIS Lead Agency;
3) Complete training with the HMIS Lead Agency at least annually;
4) Maintain security of login and workstation;
5) Follow the most recent HUD Data Standards;
6) Follow data entry standards and data quality as required in the Data Quality Plan;
7) Follow protocols as required by the Security Plan and Privacy Plan;
8) Enter client-level data into the HMIS within three (3) days of client interaction;
9) Notify CHO HMIS Administrator if data deadlines appear to be in jeopardy; and
10) Notify CHO HMIS Administrator with any questions, or if the HMIS Software System is not working properly.
11) Read all emails, and notices from the HMIS Lead Agency related to HMIS, and implement any changes in data capture or policies and procedures immediately.

HMIS Software Vendor

The software vendor (Bitfocus) is responsible for the set-up, operation, and maintenance of the HMIS software platform. Additional responsibilities are listed below:

1) Address any technical problems that arise with respect to the Bitfocus software and/or functionality;
2) Provide system and application updates to ensure the ability of the HMIS to comply with all HUD reporting requirements;
3) Interface with HMIS team to ensure that the system meets the needs of the CHOs;
4) Provide system security as set out by the HUD technical standards in regards to server, system and user access;
5) Schedule necessary and planned downtime when it will have least impact, for the shortest possible amount of time. Design and implement a backup and recovery plan (including disaster recovery);
6) Comply with any new HUD Data or Technical Standard;
7) The HMIS software vendor's employees will agree to abide by all confidentiality and ethics standards.

HMIS Access Levels

HMIS Access will differ between end users. Not all End Users will have the same level of access. End User access level will be determined by the programs the End Users is assigned to, the CHO Administrator, and the HMIS Lead. End User access levels may change.

Termination of CHO Access to HMIS

Voluntary Termination of Participation

1) The CHO shall inform the HMIS Lead Agency in writing of their intention to terminate their participation in HMIS.
2) The HMIS Lead Agency will remove the departing agency from the list of CHOs on the Butte CoC website.
3) The HMIS Lead Agency will revoke access of all CHO staff to HMIS. Note: All CHO information contained in the HMIS system will remain in the HMIS system.
4) The HMIS Lead Agency will keep all termination records on file with the associated MOU.

Termination of Participation for Lack of Compliance

1) When the HMIS Lead Agency determines that a CHO is in violation of the MOU by not fully complying with HMIS plans, forms, standards and/or governance documents, the HMIS Lead Agency will work directly with the CHO's Executive Director to resolve the issue(s) in question.
2) If the HMIS Lead Agency and CHO are unable to resolve issue(s), the HMIS/CES committee will be called upon to resolve the issue(s). If that results in a ruling of termination:
    a. The CHO will be notified in writing by the HMIS Lead Agency of the intention to terminate the CHO's participation in HMIS.
    b. The HMIS Lead Agency will revoke access of all CHO staff to HMIS. Note: All CHO information contained in the HMIS system will remain in the HMIS system.
    c. The HMIS Lead Agency will keep all termination records on file with the associated MOU.
    d. Following the involuntary termination, the CHO may appeal to the HMIS/CES committee for reinstatement to HMIS provided the CHO has corrected the issue(s) resulting in the initial termination ruling.
    e. The Butte CoC is empowered to permanently revoke a CHO's access to HMIS for a serious and/or willful breach of security or confidentiality.

Security Audits

The CHO and CHO Administrator are responsible for preventing degradation of the HMIS resulting from viruses, intrusion, or other factors within the Agency's control. The participating CHO Administrator is responsible for preventing inadvertent release of confidential client-specific information through physical, electronic, or visual access to the workstation.

Each participating CHO Administrator is responsible for ensuring their agency meets the Privacy and Security requirements detailed in the HUD HMIS Data and Technical Standards. CHOs will conduct a thorough review of internal policies and procedures regarding HMIS, on a quarterly basis.

Quarterly CHO Self-Audits

Quarterly Compliance Certification Checklist

1) The CHO Administrator will use the Compliance Certification Checklist to conduct quarterly security audits of all CHO end user workstations.
2) The CHO Administrator will audit remote access by associating User IDs, IP addresses and login

date/times with employee time sheets. End Users may not remotely access HMIS from a workstation (ie: personal computer) that is not subject to the CHO Administrator's regular audits.

3) If areas are identified that require action due to noncompliance with these standards or any element of the Butte CoC HMIS Policies and Procedures, the CHO Administrator will note these on the Compliance Certification Checklist, and the CHO Administrator will work to resolve the action item(s) within thirty (30) calendar days.
4) Any Compliance Certification Checklist that includes one (1) or more findings of noncompliance and/or action items will not be considered valid until all action items have been resolved. The Checklist findings, action items, and resolution summary must be reviewed and signed by the CHO Executive Director or other empowered officer prior to being returned to the HMIS Lead Agency.
5) The CHO Administrator must turn in a copy of the Compliance Certification Checklist to the HMIS Lead Agency on a quarterly basis.
6) CHO Administrator must keep the original signed copy of the Compliance Certification Checklist for a minimum of seven (7) years in their agency files.

Data Quality Checklist

1) The CHO Administrator will use the Data Quality Compliance Certification Checklist to conduct quarterly security audits of all CHO HMIS programs and HMIS End Users.
2) If areas are identified that require action due to noncompliance with these standards or any element of the Butte CoC HMIS Policies and Procedures, the CHO Administrator will note these on the Data Quality Checklist, and the CHO Administrator will work to resolve the action item(s) within thirty (30) calendar days.
3) Any Data Quality Checklists that includes one (1) or more findings of noncompliance and/or action items will not be considered valid until all action items have been resolved. The Checklist findings, action items, and resolution summary must be reviewed and signed by the CHO Executive Director or other empowered officer prior to being returned to the HMIS Lead Agency.
4) The CHO Administrator must turn in a copy of the Compliance Certification Checklist to the HMIS Lead Agency on a quarterly basis.
5) CHO Administrator must keep the original signed copy of the Data Qualify Checklist for a minimum of seven (7) years in their agency files.

Annual Comprehensive HMIS Lead Agency Audits of CHO

Unless a more accurate method is available (e.g., client interview, third party verification, etc.), a sampling of client source documentation can be used to measure the data accuracy rate. The HMIS Lead Agency may request client files or intake forms during the annual HMIS Security Certification Checklist process and compare the source information to the information in the HMIS. Only those parts of the client file containing the required information will be reviewed, excluding any non-relevant, personal, or Participating Agency-specific information. The HMIS Lead Agency shall provide Participating Agencies the training and tools necessary for Participating Agencies to self-monitor project performance.

1) The HMIS Lead will schedule the annual comprehensive security audit a minimum of thirty (30) days in advance with the CHO Administrator.
2) The HMIS Lead will use the Compliance Certification Checklist to conduct security audits.
3) The HMIS Lead must randomly audit at least 10% of the workstations for each HMIS CHO. In the event that an agency has more than 1 program site, minimum of 1 workstation per program site must be audited.
4) If areas are identified that require action due to noncompliance with these standards or any element of the Butte CoC HMIS Policies and Procedures, the CHO Administrator will note these on the Compliance Certification Checklist, and the CHO Administrator will work to resolve the action item(s) within thirty (30) calendar days.
5) Any Compliance Certification Checklist that includes one (1) or more findings of noncompliance and/or action items will not be considered valid until all action items have been resolved and

the Checklist findings, action items, and resolution summary has been reviewed and signed by the CHO Executive Director or other empowered officer and returned to the HMIS Lead Agency.

Physical Safeguards

In order to protect client privacy it is important that the following physical safeguards be put in place. For the purpose of this section, authorized persons will be considered only those individuals who have completed HMIS/Privacy and Security training within the past 12 months.

1) Computer Location – Computer must be in a secure location where only authorized persons have access. Computer must not be accessible to clients, the public or other unauthorized CHO staff members or volunteers.
2) Printer location – Documents printed from HMIS must be sent to a printer in a secure location where only authorized persons have access.
3) PC Access (visual) — Non-authorized persons should not be able to see an HMIS workstation screen. Monitors should be turned away from the public or other unauthorized CHO staff members or volunteers and utilize visibility filters to protect client privacy.
4) Under no circumstances will end-users store HMIS data, client PII or PPI on any personally owned media; end-users may not place PII or PPI on a work-owned USB drive for personal use.
5) PII, PPI and removable data devices (e.g., USB drives, CDs, and external drives) must be protected by appropriate physical means from modification, theft, or unauthorized access. Such records and confidential information contained therein remain subject to the HMIS Policies and Procedures. When these media have reached the end of their useful life, the data will be disposed of in a manner consistent with the procedures outlined in this policy.

Reporting Security Incidents

These Security Standards and the associated Butte CoC HMIS Policies and Procedures are intended to prevent, to the greatest degree possible, any security incidents. However, should a security incident occur, the following procedures should be followed in reporting.

1) Any HMIS End User who becomes aware of or suspects a breach of HMIS system security and/or client privacy by another end user, they must immediately report that breach to the CHO Administrator. Notification must occur within one (1) hour and in writing.
2) Any HMIS End User who becomes aware of or suspects a breach of HMIS system security and/or client privacy by the CHO Administrator, must immediately notify the HMIS Lead Agency. Notification must occur within one (1) hour and be in writing.
3) In the event of a breach resulting from suspected or demonstrated noncompliance by an End User with the HMIS End User Agreement, the CHO Administrator should immediately contact the HMIS Lead, in writing, and request End User's User ID be deactivated until an internal agency investigation has been completed.
4) Following an internal investigation, the CHO Administrator shall notify the CHO Administrator of any substantiated incidents that may have resulted in a breach of HMIS system security and/or client privacy (whether or not a breach is definitively known to have occurred). If the breach resulted from suspected or demonstrated noncompliance by an End User with the HMIS End User Agreement, the HMIS Lead reserves the right to deactivate the User ID for the End User in question pending further investigation.
5) Within 1 business day after the HMIS Lead receives notice of the breach, the HMIS Lead and CHO Administrator will jointly establish a corrective action plan to analyze the source of the breach and actively prevent future breaches. The action plan shall be implemented as soon as possible, and the total term of the plan must not exceed 30-days.
6) If the CHO is not able to meet the terms of the action plan within the time allotted, the HMIS Lead Agency, in consultation with the HMIS/CES committee, may elect to terminate the CHO's access to HMIS. The CHO may appeal to the HMIS/CES committee for reinstatement to HMIS following

completion of the requirements of the action plan.

7) In the event of a substantiated breach of client privacy through a release of PPI in noncompliance with the provisions of the Security Standards, the Butte CoC HMIS Policies and Procedures, or the CHO Privacy Statement, the HMIS Lead will attempt to notify any impacted individual(s).
8) The HMIS Lead Agency will notify the appropriate body of the Continuum of Care of any substantiated release of PPI in noncompliance with the provisions of the Security Standards, the Butte CoC HMIS Policies and Procedures, or the CHO Privacy Statement.
9) The HMIS Lead Agency will maintain a record of all substantiated releases of PPI in noncompliance with the provisions of these Security Standards, the Butte CoC HMIS Policies and Procedures, or the Partner Agency Privacy Statement for 7 years.
10) The Butte CoC reserves the right to permanently revoke a Partner Agency's access to HMIS for a breach of security or privacy.

Disaster Recovery Plan

Disaster Recovery for the Butte CoC HMIS will be conducted by the HMIS software vendor. However, the HMIS Lead Agency must be familiar with the disaster recovery plan set in place by the HMIS software vendor.

1) The HMIS Lead should maintain ready access to the following information:
    a. Contact information – Phone number and email address of the HMIS Vendor.
2) CHO responsibilities – A thorough understanding of the agency's role in facilitating recovery from a disaster.
3) All HMIS Lead Agency personnel should be aware of and trained to complete any tasks or procedures for which they are responsible in the event of a disaster.

Background Checks for HMIS Users

The Butte CoC recognizes the sensitivity of the data in HMIS, and therefore requires individuals responsible for managing, entering and/or accessing HMIS data be subject to a criminal background check.

No prospective end user or CHO HMIS Administrator will be given HMIS access if he, she or they have entered a plea of nolo contendere (no contest) or has been found guilty of any misdemeanor or felony fraud (including but not limited to identity theft), stalking, human trafficking or any related crimes. HMIS Participating Agencies cannot risk the privacy and confidentiality of client information by allowing any individual who pled nolo contendere or been found guilty of the aforementioned crimes. In the broadest sense, a fraud is an intentional deception made for personal gain or to damage another individual. HMIS participating agencies are solely responsible for conducting background checks on their employees or contract workers, who will be accessing HMIS, and for any associated costs.

The background check must include local and state records; agencies are strongly encouraged to include federal records as well. Background checks must be run in accordance with State law. Background checks that come back with a criminal history should be carefully considered prior to giving an employee access to client information. If a HMIS participating agency is unsure if a prospective HMIS End User's criminal history could or should preclude them from accessing HMIS, they must contact the CoC's HMIS Lead to determine eligibility prior to submitting a request to grant the End User access.

A background check may be conducted only once for each person unless otherwise required, and the results of the background check must be retained in the employee's personnel file through the term of their employment. All End Users must have a completed background check prior to access being requested to HMIS by a CHO. Criminal background checks must be completed on all new End Users and CHO HMIS Administrators, and the "Background Check Review and Verification Statement" must be signed by the Agency's Director, the CHO HMIS Administrator, or the Head of the HR Department.

HMIS Password Requirements

The HMIS System Administrator will issue a temporary password for each CHO end user. The user will be prompted to create a new password upon first login. Passwords must be no less than eight (8) characters in length, and must meet the following criteria:

- Minimum 8 characters in total length
- Contain upper-case letters (e.g., H)
- Contain lower-case letters (e.g., h)
- Contain Numbers (e.g., 9)
- Cannot contain your first or last name
- Contain special characters (e.g. ~ ! @ # $ % ^ & * ( ) _)
- Not using, or including, the username, the HMIS name, or the HMIS vendor's name
- Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.

Two Factor Authentication

Two-factor authentication adds an additional layer of security to the authentication process by making it harder for attackers to gain access to a person's devices or online accounts because, even if a user's password is hacked, a password alone is not enough to pass the authentication check.

In order to log into the HMIS live site or the HMIS training site all users will be required to provide two separate pieces of information to confirm their identity and access the system. Users will enter their user name and password, and a 6-digit verification code to log into HMIS. Users who enter an incorrect code more than 5 times in a minute will be locked out of their account. End Users will receive their 6-digit verification code via the email address associated with their HMIS account or by using Google authenticator or Microsoft Authenticator.

Password Reset

If an end user needs to reset their password for any reason, email HMIShelp@buttecounty.net. Assistance with password resets is only available Monday through Friday from 8am to 4:30pm (excluding holidays).

Unsuccessful Logon

If an end user unsuccessfully attempts to logon three (3) times, the user ID will be "locked out". Meaning access permission will be revoked, and user will be unable to gain access for 60 minutes or until their password is reset by the HMIS System Administrator.

Data Collection Requirements

CHOs will collect and verify the minimum set of data elements for all clients served by their programs.

Universal Data Elements (UDE)

The universal data elements include:

3.1 Name
3.2 Social Security Number
3.3 Date of Birth
3.4 Race & Ethnicity
3.6 Gender
3.7 Veteran Status
3.8 Disabling Condition
3.10 Project Entry Date
3.11 Project Exit Date
3.12 Destination
3.15 Relationship to Head of Household
3.16 Client Location
3.20 Housing Move-in Date
3.917 Prior Living Situation

Program Specific Data Elements (PSDE)

The program-specific data elements include:

4.2 Income and Sources
4.3 Non-Cash Benefits
4.4 Health Insurance
4.5 Physical Disability
4.6 Developmental Disability
4.7 Chronic Health Condition
4.11 Domestic Violence
4.12 Current Living Situation
4.13 Date of Engagement
4.14 Bed-Night Date
4.15 Financial Assistance Provided
4.19 Coordinated Entry Assessment
4.8 HIV/AIDS
4.9 Mental Health Disorder
4.10 Substance Abuse Disorder
4.20 Coordinated Entry Event

Federal Partner Program Data Elements

Federal partner Program Data Element include UDE and PSDE listed above, additional data elements are dependent on funding source and program type. More information can be found by reading the most recent HUD HMIS Data Standards.

Policies

Client data will be gathered according to the policies, procedures and confidentiality rules of each individual program.

1) Client data may only be entered or imported into HMIS if the client has provided informed consent, as demonstrated by a signed HMIS Client Informed Consent.
    a. Client's information must be entered into HMIS based on the sharing level the client authorized on the HMIS Client Informed Consent.
2) Victim service providers may not directly enter or provide client-level data to HMIS.
3) Each CHO is responsible for collecting and entering, at a minimum, all of the elements required by HUD whether or not they are required to do so by their funding source.
    a. CHOs must also collect data fields locally identified for specific projects; and
    b. CHOs shall enter data into the HMIS in real time or within three (3) business days of collecting the information. At minimum, data entered must include Universal Data Elements (UDEs). Program Specific Data Elements (PSDEs) are required to be entered as outlined in the most recently published HMIS Data Standards Manual.
    c. CHOs may also be required to collect additional data fields locally identified to

support specific regional projects. S

i. "Client Doesn't Know" and "Client Refused" must only be used to indicate the client did not know or the client refused to provide the data.
ii. "Data Not Collected" must only be used to indicate the data was not collected. CHOs understand and agree that "Data Not Collected" should not be used unless there is no other option. If "Data Not Collected" is used, End Users should make all efforts to collect and enter missing data within three (3) business days.

4) The CHO that creates a client record owns the responsibility for a baseline of data quality to include: non-duplication of the client record, HMIS Client Informed Consent, Universal & Program Level Data Elements as defined by HUD Data Standards, and Program Entries and Exits. Quality assurance shall be the ultimate responsibility of each CHO.
5) The CHO that enrolls a client into a program owns the responsibility for a baseline of data quality to include: Universal Data Elements (UDE) and Program Level Data Elements (PDE) as defined by HUD Data Standards, and Program Entries and Exits. Quality assurance shall be the ultimate responsibility of each CHO.
6) All HMIS CHOs shall be committed to timely, accurate and complete entry of client specific data into HMIS in order to provide program managers and local policy makers with reports that facilitate strategic planning.

Public Notice

The *Butte Countywide Homeless Information Systems (HMIS) Public Notice* must be posted at all workstations in which intakes, interviews or where HMIS data is being gathered so it is viewable to all clients.

Privacy Notice

The *Butte Countywide Continuum of Care Privacy Notice (Privacy Notice)* specifically details Uses and Disclosures of Protected Personal Information (PPI). This Privacy Notice applies to all CHOs. When other federal or state privacy or security laws apply to an organization, the organization must comply with the requirements that provide the greatest protection for the client's PPI. If an agency is covered by the Health Insurance Portability and Accountability Act (HIPAA), the HIPAA regulations prevail.

CHO must offer a copy of the Privacy Notice to Clients, and provide a copy upon request.

If an agency maintains a public web page, the agency must post the Privacy Notice on its web page.

Data Quality and Completeness

All data entered into the HMIS shall be complete. Partially complete or missing data (whether UDE or PDE) can negatively affect the ability to provide comprehensive care to clients. Missing data can affect a CHOs ability to access and/or retain funding, and can negatively affect a client's ability to become permanently housed and end their homelessness.

The goal is to collect one hundred percent (100%) of all data elements. However, the Butte CoC recognizes this may not be possible in all cases. Therefore, it has established an acceptable range of Missing (null) and Incomplete (Client Doesn't Know/Client Refused) responses, depending on the data element and the type of project entering data.

All projects using the HMIS shall enter data on one hundred percent (100%) of the clients they serve, and meet a data quality benchmark of < 5% error on all data collected.

Accuracy

All data entered into the HMIS shall be a reflection of information provided by the client. Intentionally recording inaccurate information is strictly prohibited. All data in HMIS shall be collected and entered in a common and consistent manner across all projects. Only when a client prefers not to provide personal information and the program funder does not prohibit it, is it permissible to enter client data under an alias. Participating Agencies are responsible to their program's funding source for any duplication of services that results from entering false information (i.e., hiding the actual name under an alias).

Timeliness

Participating Agencies are expected to enter data into the HMIS in real-time or within three (3) business days of collection and/or client interaction.

CHO Administrators must pull Data Quality reports on a minimum of a quarterly basis, to review/audit CHO End Users Data Quality, and ensure accuracy and timeliness. If CHO Administrator finds CHO End Users are not compliant with Data Quality, accuracy and timeliness, CHO Administrator will work with End Users to correct and ensure compliance.

Bed/Unit Utilization Rates

Acceptable range of bed/unit utilization rates for established projects are as follows:

- Emergency Shelters (ES): 75%-105%;
- Transitional Housing (TH): 80%-105%; and
- Permanent Supportive Housing (PSH): 85%-105%.

Projects outside of this acceptable range may provide a brief explanation to the HMIS Lead Agency. New projects may require time to reach the projected occupancy numbers and will not be expected to meet the utilization rate requirement during the project's first operating year.

Should an agency have a question regarding utilization rates they should contact the agency's CHO Administrator or the HMIS Lead Agency for direction.

Data Validity

Data Validity refers to all End Users defining and interpreting data elements the same way. HMIS uses HUD definitions. These definitions may differ from common verbiage and from State definitions. It is crucial that when entering information into HMIS that End Users are cognizant of HUD definitions and communicate these definitions to the clients they serve, to ensure information entered into HMIS is correct and valid.

Should an End User have a question regarding HMIS definitions or how to interpret a data element they should contact the agency's CHO Administrator or the HMIS Lead Agency for direction.

Release and Disclosure of Client Data

Policies

Client-specific data from HMIS may be shared with CHOs, and only when the sharing agency has secured informed consent authorizing such sharing, as demonstrated by a signed HMIS Client Informed Consent form,

and only during such time that HMIS Client Informed Consent is valid (before its expiration).

Other non-HMIS inter-agency agreements **do not** cover the sharing of HMIS data. Sharing of client data may be limited by program specific confidentiality rules.

1) No client-specific data will be released or shared outside of the Partner Agencies unless the client gives specific written permission or unless withholding that information would be illegal. Note that services may NOT be denied if the client refuses to sign the Client Informed Consent and Release of Information Authorization or declines to state any information.
2) Aggregate data that does not contain any client-specific identifying data may be shared with internal and external agents without specific permission.

Procedures

HMIS Client Informed Consent constitutes informed consent. The burden rests with the CHO and CHO End User to inform the client about the purpose and function of HMIS data before asking for consent. As part of informed consent, a notice must be posted in the intake area explaining the reasons for collecting the data, the client's rights with regard to data collection, and any potential future uses of the data. An example of such a sign may be found in the Butte CoC website (https://www.buttehomelesscoc.com/).

1) CHO End Users must obtain a new signed Informed Consent and enter it into HMIS if the client's original release has expired, or will expire within 30 days.
2) If a client signs a HMIS Informed Consent, but chooses not to share information with other CHOs, End Users' data collection and data entry practices should follow the workflow and specific data entry guidelines established in the HMIS End User Manual to prevent sharing of client assessment information.
3) End Users or CHO Administrators will not share client-specific HMIS data with any person who is not also a current HMIS End User, either within their own agency or with other agencies.

Technical Support Protocol

Support requests include problem reporting, requests for enhancements (features), or other general technical support. The HMIS Lead Agency will only provide support for issues specific to the HMIS software and systems.

The process for requesting technical support or making technical recommendations is as follows:

1) HMIS users should first seek technical support from the CHO HMIS Administrator.
2) If more expertise is required to further troubleshoot the issue, CHO HMIS Administrator or end user will contact the HMIS Lead Agency by emailing HMIShelp@buttecounty.net
    a. The email should provide issue details if possible (or help recreate the problem by providing all information, screenshots, reports, etc.) in order for the HMIS Lead Agency to recreate the problem.
    b. The HMIS Lead will try to respond to all email inquiries and issues within 1 business day, but support load, holidays, and other events may affect response time.
3) If necessary, the HMIS Lead Agency will submit a ticket to vendor if progress is stalled.
4) If the support request is deemed by the HMIS Lead agency to be an agency-specific customization, (agency-specific customizations include but are not limited to new assessments, new data fields, and new pick-lists), resolution of the request may be prioritized accordingly.
5) Requests for technical support will be processed in priority order according to their severity and impact.

Client Rights

Clients have the right to see and receive a copy of the information that the HMIS maintains about them, except for information compiled in anticipation of litigation, information about another individual, information obtained under a promise of confidentiality, or information that would, if disclosed, endanger the life or safety of another.

1) Clients have a right to privacy and confidentiality;
2) Clients have a right to not answer any questions unless entry into the Agency's program requires it;
    a. If a client refuses to answer HMIS required question, the client cannot be denied services, and the end user will not attempt to force a client to provide information they are not comfortable sharing.
3) Client information may not be shared without informed consent (posting of Privacy Notice and a signature authorizing that the client is willing to share their information between CHOs on the Butte Countywide Continuum of Care Informed Consent).
4) Every client has a right to an understandable explanation of the Informed Consent form, HMIS and what "consent to participate" means. The explanation shall include:
    a. Type of information collected;
    b. How the information will be used;
    c. Under what circumstances the information will be used;
    d. That refusal to provide consent to collect information shall not be grounds for refusing entry to the program;
    e. A copy of the consent shall be given to the client upon request and a signed copy shall be uploaded into the client's HMIS file; and
    f. A copy of the Privacy Notice shall be made available upon client request.

Appendices of Forms

- Appendix A; HMIS Public Notice
- Appendix B; HMIS Privacy Notice
- Appendix C; End User Agreement
- Appendix D; Informed Consent
- Appendix E; HMIS Participating Agency List
- Appendix F; CES Participating Agency List
- Appendix G; Quarterly Compliance Certification Checklist
- Appendix H; Quarterly Data Quality Checklist

Resources

Regulations and Requirements

HEARTH Act of 2009, S. 896
https://www.hudexchange.info/resource/1715/mckinney-vento-homeless-assistance-act-amended-by-hearth-act-of-2009/

CoC Program Interim Rule, 25 CFR Part 578
https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/

HMIS Requirements Proposed Rule, 76 FR 22 76917
https://www.hudexchange.info/resource/1967/hearth-proposed-rule-for-hmis-requirements/

HMIS Data Standards

2004 HUD HMIS Data and Technical Standards, U.S. Dept. of Housing and Urban Development
https://www.hudexchange.info/resource/1318/2004-hmis-data-and-technical-standards-final-notice/

2024 HMIS Data Standards, U.S. Dept. of Housing and Urban Development
https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2024.pdf

2024 HMIS Data Dictionary, U.S. Dept. of Housing and Urban Development
https://files.hudexchange.info/resources/documents/HMIS-Data-Dictionary-2024.pdf

Document Revision History

Date	Version	Editor/Author	Notes
9/20/2023	1.0	Elisa Rawlinson	Initial Draft – New Version of Policies & Procedures

Appendix A; HMIS Public Notice

Butte Countywide Homeless Information Systems (HMIS) Public Notice

We collect personal information directly from you to:

1. *Best connect you with the services you need;*
2. *Better understand the needs of homeless persons;*
3. *Improve planning to eliminate homelessness; and*
4. *Improve services for homeless persons.*

The only people who will be allowed to see your information are HMIS trained staff for homeless service providers who have agreed to keep your information confidential. Additional details regarding data collection and sharing are discussed in our Privacy Notice. If you would like a copy of our Privacy Notice, please ask.

Appendix B; HMIS Privacy Notice

Butte Countywide Continuum of Care
Privacy Notice

Adopted November 16, 2020

A. Scope of Notice

1. This notice describes the privacy policy and practices of Butte Countywide Homeless Continuum of Care (Butte CoC) and Name of Homeless Organization, a Contributing HMIS Organization (CHO). Our main office is at Address, email/web address,telephone of Homeless Organization.
2. A Homeless Management Information System (HMIS) is a software system used to collect data on the housing and services provided to homeless individuals and families and persons at risk of homelessness. All homeless assistance programs that are a part of the Butte CoC must participate in the HMIS, and are called Contributing HMIS Organizations (CHOs). CHO's are required to collect universal data elements from all clients, including Protected Personal Information (PPI).
3. The policy and practices in this notice cover the processing of PPI HMIS for clients of Name of Homeless Organization.
4. Protected Personal information (PPI) is any information we maintain about a client that:
   a. allows identification of an individual directly or indirectly
   b. can be manipulated by a reasonably foreseeable method to identify a specific individual or
   c. can be linked with other available information to identify a specific client
5. When this notice refers to personal information, it means PPI.
6. All personal information that we maintain is covered by the policy and practices described in this privacy notice. if programs provided by your agency have additional privacy requirements, please add that information here: for example " Personal information that the medical clinic collects and maintains is covered by a different privacy policy". Or Delete this text.
7. We adopted this policy because of standards for HMIS issued by the Department of Housing and Urban Development. We intend our policy and practices to be consistent with those standards. See 69 Federal Register 45888 (July 30, 2004).
8. This notice tells our clients, our staff, and others how we process personal information. We follow the policy and practices described in this notice.
9. We may amend this notice and change our policy or practices at any time. Amendments may affect personal information that we obtained before the effective date of the amendment.
10. We give a written copy of this privacy notice to any individual who asks.

11. A copy of this notice can be found on the HMIS/CES page of the Butte CoC website at www.buttehomelesscoc.com

B. Data Collection and Purpose

1. We collect personal information only when appropriate to provide services or for another specific purpose of our organization or when required by law. We may collect information for these purposes:
   a. to provide or coordinate services to clients
   b. to locate other programs that may be able to assist clients
   c. for functions related to payment or reimbursement from others for services that we provide
   d. to operate our organization, including administrative functions such as legal, audits, personnel, oversight, and management functions
   e. to comply with government reporting obligations
   f. when required by law

2. We only use lawful and fair means to collect personal information.

3. We normally collect personal information with the knowledge or consent of our clients. If you seek our assistance and provide us with personal information, we assume that you consent to the collection of information as described in this notice.
4. We may also get information about you from other CHOs within the Butte CoC.
5. We post a sign at our intake desk or other location explaining the reasons we ask for personal information. The sign says:

   We collect personal information directly from you to:
   1. Best connect you with the services you need;
   2. Better understand the needs of homeless persons;
   3. Improve planning to eliminate homelessness; and
   4. Improve services for homeless persons.

   The only people who will be allowed to see your information are HMIS trained staff for homeless service providers who have agreed to keep your information confidential. Additional details regarding data collection and sharing are discussed in our Privacy Notice. If you would like a copy of our Privacy Notice, please ask.

C. Permitted Uses and Disclosures

1. We use or disclose personal information for activities described in this part of the notice. We may or may not make any of these uses or disclosures with your information. We assume that you consent to the use or disclosure of your personal information for the purposes described here and for other uses and disclosures that we determine to be compatible with these uses or disclosures:

a. to connect individuals to appropriate resources or services, for housing prioritization purposes, and for determining an individual's progress in programs or services
b. for functions related to payment or reimbursement for services
c. to carry out administrative functions such as legal, audits, personnel, oversight, and management functions
d. to create de-identified (anonymous) information that can be used for research and statistical purposes without identifying clients
e. when required by law to the extent that use or disclosure complies with and is limited to the requirements of the law
f. to avert a serious threat to health or safety if
   (1) we believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
   (2) the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat
g. to report about an individual we reasonably believe to be a victim of abuse, neglect or domestic violence to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence
   (1) under any of these circumstances:
      (a) where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law
      (b) if the individual agrees to the disclosure, or
      (c) to the extent that the disclosure is expressly authorized by statute or regulation, and
         (I) we believe the disclosure is necessary to prevent serious harm to the individual or other potential victims, or
         (II) if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure.

   and
   (2) when we make a permitted disclosure about a victim of abuse, neglect or domestic violence, we will promptly inform the individual who is the victim that a disclosure has been or will be made, except if:
      (a) we, in the exercise of professional judgment, believe informing the individual would place the individual at risk of serious harm, **or**
      (b) we would be informing a personal representative (such as a family member or friend), and we reasonably believe the personal representative is responsible for the abuse, neglect or other injury, and that informing the personal representative would not be in the best interests of the individual as we determine in the exercise of professional judgment.
h. for academic research purposes
   (1) conducted by an individual or institution that has a formal relationship with the CHO if the research is conducted either:

(a) by an individual employed by or affiliated with the organization for use in a research project conducted under a written research agreement approved in writing by a designated CHO program administrator (other than the individual conducting the research), or
(b) by an institution for use in a research project conducted under a written research agreement approved in writing by a designated CHO program administrator.

and

(2) any written research agreement:
(a) must establish rules and limitations for the processing and security of PPI in the course of the research
(b) must provide for the return or proper disposal of all PPI at the conclusion of the research
(c) must restrict additional use or disclosure of PPI, except where required by law
(d) must require that the recipient of data formally agree to comply with all terms and conditions of the agreement, and
(e) is not a substitute for approval (if appropriate) of a research project by an Institutional Review Board, Privacy Board or other applicable human subjects protection institution.

i. to a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under any of these circumstances:
(1) in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena
(2) if the law enforcement official makes a written request for PPI that:
(a) is signed by a supervisory official of the law enforcement agency seeking the PPI
(b) states that the information is relevant and material to a legitimate law enforcement investigation
(c) identifies the PPI sought
(d) is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought, and
(e) states that de-identified information could not be used to accomplish the purpose of the disclosure.
(3) if we believe in good faith that the PPI constitutes evidence of criminal conduct that occurred on our premises
(4) in response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosed consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics, or
(5) if
(a) the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others), and
(b) the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.

and

j. to comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.

2. Before we make any use or disclosure of your personal information that is not described here, we seek your consent first.

D. Client Control Over Data

1. You may inspect and have a copy of your personal information that we maintain. We will offer to explain any information that you may not understand.
2. We will consider a request from you for correction of inaccurate or incomplete personal information that we maintain about you. If we agree that the information is inaccurate or incomplete, we may delete it or we may choose to mark it as inaccurate or incomplete and to supplement it with additional information.
3. To inspect, get a copy of, or ask for correction of your information, ask an agency staff member for assistance, contact this organization at Address, email/web address, telephone of Homeless Organization, or email ButteCoC@buttecounty.net.
4. We may deny your request for inspection or copying of personal information if:
   a. the information was compiled in reasonable anticipation of litigation or comparable proceedings
   b. the information is about another individual (other than a health care provider or homeless provider)
   c. the information was obtained under a promise or confidentiality (other than a promise from a health care provider or homeless provider) and if the disclosure would reveal the source of the information, **or**
   d. disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
5. If we deny a request for access or correction, we will explain the reason for the denial. We will also include, as part of the personal information that we maintain, documentation of the request and the reason for the denial.
6. We may reject repeated or harassing requests for access or correction.

E. Data Quality

1. We collect only personal information that is relevant to the purposes for which we plan to use it. To the extent necessary for those purposes, we seek to maintain only personal information that is accurate, complete, and timely.
2. We have a plan to dispose of personal information not in current use seven years after the information was created or last changed. As an alternative to disposal, we may choose to remove identifiers from the information.

3. We may keep information for a longer period if required to do so by statute, regulation, contract, or other requirement.

F. Complaints and Accountability

1. We accept and consider questions or complaints about our privacy and security policies and practices. You can complain about our privacy and security policies by writing to: Butte County DESS Housing and Homeless Branch, 202 Mira Loma Drive, Oroville, CA 95965 or e-mailing ButteCoC@buttecounty.net. You will receive a response in writing postmarked or date stamped within five working days if a valid email address or mailing address is provided in the written complaint.
2. All members of our staff (including employees, volunteers, affiliates, contractors and associates) are required to comply with this privacy notice. Each staff member must receive and acknowledge receipt of a copy of this privacy notice.

G. Privacy Notice Change History

1. Version 1.0, 11-16-2020, Initial Policy

Appendix C; End User Agreement

Contributing HMIS Organization End User Agreement

Butte Countywide Continuum of Care Homeless Management Information System

_____
Agency Name

_____
End User Name (Agency Employee)

The Butte Countywide Homeless Continuum of Care (Butte CoC) Homeless Management Information System (HMIS), is a local information technology system used to collect client-level data, and data on the provision of housing and services to homeless individuals and families. The system enables local homeless service providers to coordinate and streamline client services. HMIS data is required by many state and federal funding sources, and is used to determine funds related to homelessness and homeless services.

As an End User of HMIS, you have a moral and legal obligation to ensure client data is collected, accessed, and used appropriately. Misuse of data can result in you being held legally and criminally liable under both State and federal law. End Users and the Contributing HMIS Organization (CHO) HMIS Administrator must ensure client data is collected, entered, accessed and used only on a need to know and right to know basis.

The Butte CoC is committed to maintaining the confidentiality of client information and protecting clients' rights. To ensure compliance with this obligation, review, and initial each item below. By initialing and signing this form you are indicating you understand and comply with the requirements related to being a HMIS End User:

_____ I understand that I have an obligation to maintain client privacy and to protect and safeguard the confidentiality of a client's Personal Identifiable Information (PII). PII includes, but is not limited to, client's name, address, telephone number, social security number, date of birth, type of care provided, medical condition or diagnosis, veteran status, employment information, and any and all other information relating to the services provided to the client by this or other agencies.

_____ I will receive, complete and pass HMIS training in the HMIS training site before being granted access to the live HMIS program.

_____ I understand once I have access to the live site, I will be required to re-sign this End User Agreement. Additionally, every 6 (six) months, the live site will require me to re-sign this agreement.

_____ I will participate in annual HMIS update training as long as I am an End User.

_____ I have read and will abide by all the HMIS Policies and Procedures, including data standards required by the Data Quality Plan and protocols required by the Security and Privacy Plans.

_____ I understand the HMIS Policies and Procedures, the Data Quality Plan, and the Security and

Privacy Plans are dynamic, meaning they can and will be modified, and I am responsible for complying with any changes made to these plans.

_____ I understand that my username and password are for my use only and must not be shared with anyone, including but not limited to another End User, and my agency's CHO HMIS Administrator.

_____ I must take all reasonable means to keep my password secure, including but not limited to never selecting the option to have my browser save my password.

_____ If I am logged into HMIS and need to leave the computer, tablet, phone or other mobile device or work area for any amount of time, I will log off the software, close the browser and lock the device before leaving.

_____ I understand my computer, tablet, phone or other mobile device must have password protected screensavers set at no more than 15 minutes.

_____ If I use a laptop computer, tablet, phone or any other mobile device to enter HMIS data, I will not use that for unauthorized purposes or from unauthorized locations.

_____ I will notify my CHO HMIS Administrator if deadlines appear to be in jeopardy, if the HMIS Software System is not working correctly, or if I have any other questions.

_____ I understand that only authorized End Users and agency CHO HMIS Administrators can view HMIS information, and not all End Users can view all information.

_____ I will ensure HMIS data and client interactions are entering into the system within 3 days.

_____ I will ensure that paper documentation or physical files are complete, secure, and confidential at all times, and when no longer needed, are properly destroyed to maintain confidentiality.

_____ I may only view, obtain, disclose, or use database information necessary to perform my job. As an HMIS user, I understand I may not look up a client in HMIS to know their whereabouts, their history or current information for the purposes of outside inquiries or personal use.

_____ I understand that I can be held legally liable for any unauthorized access, usage, or disclosure of data collected for the purpose of entering into the HMIS database and data held within HMIS as specified in the California Penal Code Section 502 and/or under other State and federal laws.

_____ I agree I will maintain HMIS data in such a way as to protect against revealing the identity of clients to unauthorized agencies, individuals or entities, including but not limited to law enforcement agencies.

_____ I will not discuss client's personal or other information in a public area.

_____ I will not electronically transmit unencrypted client data across a public network. I understand that PII cannot be distributed through email.

_____ Discriminatory comments base on race, color, religion, national origin, ancestry, handicap, age, gender, orientation, are not permitted in HMIS. Profanity and offensive language are not permitted in HMIS.

_____ I will not log into HMIS during non-work hours, or on computers or any device that is not approved by my agency.

_____ If I notice or suspect a security breach within HMIS or related to HMIS data, I must immediately notify my CHO HMIS Administrator. Notification must occur within one (1) hour and in writing.

_____ If I notice or suspect a security breach committed by the CHO HMIS Administrator, I must immediately notify the HMIS Lead Agency. Notification must occur within one (1) hour and in writing.

_____ I will not knowingly enter malicious or erroneous information into HMIS.

_____ The appropriate client Informed Consent form must be completed with each client whose data is to be entered into HMIS and uploaded to the client profile.

_____ I understand that my username and password will terminate should I move employment and will not be passed on to the staff person that replaces me.

_____ I understand these rules apply to all HMIS Users, whatever their work role or position.

_____ I have completed the required criminal background check through my agency. I understand I am not allowed to access HMIS if I have ever had a felony or misdemeanor conviction, been found guilty of or entered a plea of nolo contendere (no contest) to any fraud, identity theft, stalking, human trafficking or related charges.

You are required to maintain strict confidentiality of information obtained through or related to Butte CoC HMIS. Data and information will be used only for legitimate client service and administration of the above-named agency. Any breach of confidentiality or failure to comply with the terms listed above will result, at a minimum, in your immediate and lifelong termination in participation in the Butte CoC HMIS.

_____ _____

End User Signature Date

_____ _____

CHO Administrator Date

Appendix D Informed Consent

Client Name: _____ Client DOB: _____

Butte Countywide HMIS Client Informed Consent

PERMISSION TO SHARE PROTECTED IDENTIFYING INFORMATION (PII) TO SECURE NECESSARY SERVICES
Please read the following notice and authorization (or ask to have it read to you) before signing.

_____ (Enter your Agency's name in the space) is a Partner Agency in the Butte Countywide Homeless Management Information System (HMIS). HMIS is a shared housing and homeless services database. HMIS operates over the Internet, and uses many security protections to keep your information private and secure.

HOW YOU WILL BENEFIT FROM PROVIDING YOUR CONSENT TO SHARE YOUR PERSONAL INFORMATION:
The information collected in the HMIS is for the purpose of finding out what kind of services you and your family are in need of. The personal information contained in the HMIS database may be shared with Partner Agencies to find and set up the most effective services and resources within the community for you and your family. As you receive services, information will be collected about you, the services provided to you, and the outcomes these services help you to achieve. The information shared may consist of the following Protected Identifying Information (PII):

- Name
- Date of Birth
- Social Security Number
- Gender
- Ethnicity & Race
- Residence Prior to project entry
- Current & historical housed and unhoused status
- Family composition
- Alcohol & Drug history*
- Information about services provided by HMIS participating agencies (including: date, duration, type of service and other similar service information)
- Legal history
- Domestic Violence**
- Income & Non-Cash benefit information
- VI-SPDAT
- Photo
- Veteran Status
- Employment Status
- Disabling condition (physical and/or mental health)

*Alcohol and Drug history information will not prevent you receiving homeless services and/or housing assistance.
**Domestic Violence information is provided by you during your assessment to be on the list for available housing.

Your information will not be shared with any agencies outside of the Butte Countywide HMIS, unless we are required to do so by law.

Right to Decline or Revoke: I understand that I have the right to not share my information or to stop sharing my information at any time by writing to: Housing and Homeless Branch, 202 Mira Loma Drive, Oroville, CA 95965 or e-mailing ButteCoC@buttecounty.net. May also call 530-552-6200 and select option to speak with Housing Navigator or you can inform the agency you are working with and they will email the Housing and Homeless Branch of Butte County Department of Employment and Social Services.

Expiration/Renewal: I understand this Consent is good for 3 years from the date of my signature below OR until I cancel my consent. I understand that if I cancel my Consent, all information about me already in the database will remain, but will become invisible to all of the participating agencies.

Other Rights: I understand that sharing my information is voluntary and I can refuse to sign this consent form. I understand if I refuse to sign this Consent, I will still receive services, but they may be limited or delayed. I understand I have the right to see the client confidentiality policies used by the HMIS Partner Agencies.

Butte Countywide HMIS Client Informed Consent

Right to a Copy of My Information: I understand that I may have a copy of the information collected in HMIS by Partner Agencies.

Right to a Copy of this Consent: I have right to receive a copy this Consent form.

Authorized Participating Agencies: The current list of Butte Countywide HMIS Participating Agencies is available on the Butte Countywide CoC Website www.buttehomelesscoc.com
List all Dependent children under 18 in household, if any (first and last names):

1. _____ 2. _____

3. _____ 4. _____

5. _____ 6. _____

Please initial ONE of the following levels of consent:

_____I give consent for my/our basic and relevant information to be entered into HMIS and shared with Partner Agencies in the Butte Countywide HMIS. I understand that I may have a copy of the information shared between Partner Agencies.

OR
_____I give consent for my/our basic and relevant information to be entered into HMIS, but **not** shared with Partner Agencies in the Butte Countywide HMIS. The information gathered and prepared by this Agency can be included in the HMIS database.

_____ _____
Client's Signature Date

☐ Verbal Consent obtained by phone (Agency Staff Initials): _____ Date: _____

_____ _____ _____
Agency Personnel Name (print) Agency Personnel Signature Date

Note: A separate HIPAA-compliant authorization is required for disclosure of any patient health information, including mental health and drug and alcohol information protected by any State or Federal privacy law including, but not limited to, Health Insurance Portability and Accountability Act ("HIPAA"), 45 C.F.R. parts 160 and 164, California Confidentiality of Medical Information Act ("CMIA"), Civil Codes sections 56-56.16, Welfare and Institutions Code section 5328, or 42 C.F.R. part 2.1 et se

Appendix E; HMIS Participating Agency List

HMIS Participating Agencies

2-1-1 Help Central

Ampla Health

Blue Cross Partners of CA

Butte/Glenn Community College

Butte County Behavioral Health

Caminar

Chico Housing Action Team (CHAT)

Chico Unified School District

Community Action Agency

Department of Employment and Social Services (DESS)

Health Net

Home & Heart

Housing Authority of Butte County

Jesus Center

Nation's Finest

Northern Circle Indian Housing Authority

Oroville Rescue Mission

Oroville Southside Community Improvement Association

Safe Space Winter Shelter

True North Housing Alliance

Vectors

Veterans Administration

Youth for Change

Appendix F; CES Participating Agency List

CES Participating Agencies

2-1-1 Help Central

Butte/Glenn Community College

Caminar

Chico Housing Action Team (CHAT)

Chico Unified School District

Community Action Agency (CAA)

Department of Employment and Social Services (DESS)

Home & Heart

Jesus Center

Nation's Finest

Northern Circle Indian Housing Authority

Oroville Rescue Mission

Oroville Southside Community Improvement Association (OSCIA)

Safe Space Winter Shelter

True North Housing Alliance

Youth for Change

Appendix G; Quarterly Compliance Certification Checklist

Butte County CoC HMIS Quarterly Compliance Certification Checklist	☐ Quarter 1, due 4/30	CHO Agency Name:	
	☐ Quarter 2, due 7/31	CHO Administrator Name:	
	☐ Quarter 3, due 10/31	Date Completed:	
	☐ Quarter 4, due 1/31	Date Sent:	

Workstation Security Standards

In partnership with the Butte Countywide Continuum of Care (CoC), Clarity Human Services Software, a division of Bitfocus, Inc., administers the County's Homeless Management Information System (HMIS), a shared database software application which collects, client-level information related to homelessness in the County. Client information is collected in HMIS by Contributory HMIS Organizations (CHO or collectively, CHOs). Information collected is used by the HUD and the CoC to identify national and local patterns and trends in homelessness over time; to conduct needs assessments and prioritize services for certain homeless and low-income subpopulations; to enhance inter-agency coordination; and to monitor and report on the quality of housing and services. This Compliance Certification Checklist is to be completed and certified quarterly by every CHO Administrator according to the schedule outlined below. Each Agency workstation and device used for HMIS data collection, data entry, or reporting must be certified compliant. Any identified compliance issues must be resolved within thirty (30) calendar days. Upon completion, the original signed copy of this checklist should be retained in the records of the HMIS CHO named above for a minimum of seven (7) years. Additionally, a copy should be emailed to the HMIS Lead at HMIShelp@buttecounty.net with the subject line: "Quarterly compliance check for _____(name of CHO)".

Compliance Certification Schedule:

- Quarter 1 (due by April 30th): ALL Active HMIS Users and Workstations Q1 (Jan-Mar)
- Quarter 2 (due by July 31st): ALL Active HMIS Users and Workstations Q2 (Apr-June)
- Quarter 3 (due by October 31st): ALL Active HMIS Users and Workstations Q3 (July-Sep)
- Quarter 4 (due by January 31st): ALL Active HMIS Users and Workstations Q4 (Oct-Dec)

Workstation Security Standards

1. A Privacy Notice is visibly posted at each HMIS workstation(or comparable location or device). If multiple HMIS workstations are located in the same room, a single Privacy Notice may be posted if it is easily visible from each HMIS workstation. If the workstation is not in a fixed location Privacy notice is being provided as a handout.
2. Each HMIS workstation computer is in a secure location where only Authorized Persons* have access.
3. Each HMIS workstation computer is password-protected and locked when not in use. (Changing passwords on a regular basis is recommended)
4. Documents printed from HMIS are sent to a printer in a secure location where only Authorized Persons have access.
5. Non-authorized persons are unable to view any HMIS workstation computer monitor.
6. Each HMIS workstation computer has anti-virus software with current virus definitions, within the past twenty-four (24) hours, and each has had a full system scan within the past week.
7. Each HMIS workstation computer has and uses a hardware or software firewall.
8. Unencrypted PPI ** has not been electronically stored or transmitted in any fashion (including, without limitation, by hard drive, flash drive, emails, etc.) (Encrypted hard drives are recommended)

9. Hard-copies of PPI (including, without limitation, client files, intake forms, printed reports, etc.) are stored in a physically secure location.
10. Each HMIS workstation computer password information, including each Authorized Person's user identification information, is kept electronically and physically secure.
    a. No passwords for HMIS have been saved on the computer, browser or server.
    b. No log-in information (e.g. passwords, user names) is written down or have been shared.

**An "Authorized Person" means a CHO authorized agent or representative (a HMIS End User or simply an End User) who has completed HMIS training.*
***Protected Personal Information (PPI) is defined as client-level identifying information, including, without limitation, information about names, birth dates, gender, race, social security number, phone number, residence address, photographic likeness, employment status, income verification, public assistance payments or allowances, food stamp allotments, or other similar information*

CHO Administrator Workstation Checklist

Instructions: For each HMIS workstation at your agency fill in the workstation location or end username. Verify checklist items 1 through 10b on the form below and check (✓) the box to confirm the verification is complete. Fill in additional notes/comments and compliance issues as needed. Attach additional pages if necessary. Return this form to HMIShelp@buttecounty.net

No.	Workstation Location Or End User Name	1	2	3	4	5	6	7	8	9	10	10a	10b	Notes
1														
2														
3														
4														
5														
6														

No.	*Workstation Location Or End User Name*	1	2	3	4	5	6	7	8	9	10	10a	10b	*Notes*
7														
8														
9														
10														
12														
13														

Workstation Security Compliance Issues Identified	*Corrective Action Taken to Resolve Security Compliance Issue*

Workstation Security Compliance Issues Identified	*Corrective Action Taken to Resolve Security Compliance Issue*

CHO Administrator Works station Checklist

I have verified that, (initial):

_____ Each End User workstation / device used to access HMIS has completed the Workstation Security Standards review.

_____ All devices used to access HMIS by CHO End Users were provided and authorized for use by CHO.

_____ Each End User is completing the Butte CoC HMIS Informed Consent with clients.

_____ Each End User requires access to HMIS to perform their assigned duties.

_____ No unauthorized access to HMIS or confidential legally protected client data was divulged to unauthorized third parties.

_____ Incident of unauthorized access or security breach has been reported to HMIS Lead Agency and impacted clients have been notified.

Date of Incident: _____ Name of HMIS Lead Agency Staff Member Informed: _____

_____	_____	_____
CHO Administrator Name (Print)	CHO Administrator Signature	Date
_____	_____	_____
CHO Agency Director Name (Print)	CHO Agency Director Signature	Date

Appendix H; Quarterly Data Quality Checklist

☐ Quarter 1, due 4/30	☐ Quarter 2, due 7/31	☐ Quarter 3, due 10/31	☐ Quarter 4, due 1/31
Butte County CoC HMIS Data Quality Checklist	**CHO Agency Name:**	**CHO Administrator Name:**	
	Date Completed:	**Date Sent:**	

Data Quality Standards

Client information is collected in HMIS by Contributory HMIS Organizations (CHO or collectively, CHOs). Information collected is used by the HUD and the CoC to identify national and local patterns and trends in homelessness over time. A Data Quality Checklist is to be completed for EACH program and certified quarterly by every CHO Administrator according to the schedule outlined below.* Each HMIS End User and program must be certified compliant. Any identified compliance issues must be resolved within thirty (30) calendar days. Upon completion, the original signed copy of this checklist should be retained in the records of the HMIS CHO named above for a minimum of seven (7) years. Additionally, a copy should be emailed to the HMIS Lead at HMIShelp@buttecounty.net with the subject line: "Quarterly Data Quality check for _____(name of CHO).

Compliance Certification Schedule:

- Quarter 1 (due by April 30th): ALL Active HMIS Programs Q1 (Jan-Mar)
- Quarter 2 (due by July 31st): ALL Active HMIS Programs Q2 (Apr-June)
- Quarter 3 (due by October 31st): ALL Active HMIS Programs Q3 (July-Sep)
- Quarter 4 (due by January 31st): ALL Active HMIS Programs Q4 (Oct-Dec)

***Pages 1 and 2 should be completed once per quarter per agency, pages 3 through 6 should be completed per program.**

CHO Data Quality Stats (*Monthly Staff Report [DQXX-103]*)	
CHO Average Data Entry Timeliness (in days)	
CHO Refused DQ Score	%
CHO Don't Know DQ Score	%
CHO Not Collected DQ Score	%
CHO Unique Client Count	

Inactive Staff with Actively Enrolled Clients (*Monthly Staff Report [DQXX-103]*)		
Name	**# of Unique Clients**	**# of New Clients**

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Active Staff (*Monthly Staff Report [DQXX-103]*)									
Name	**# of Unique Clients**	**# of New Clients**	**AVG Timeliness (in days)**	**Don't Know DQ Score**	**Refused DQ score**	**Not Collected DQ Score**	**Last Log in Date**	**Annual Assessments Completed**	**Still needs HMIS Access (Yes/No)**
				%	%	%			

Staff Active During the Reporting Period No Longer Requiring Access to HMIS				
Full Name	**Date No Longer Needed HMIS Access**	**Date Requested HMIS Lead Deactivate User**	**Reason Deactivation not requested within 24 hours**	**Reason End User No Longer Requires Access to HMIS**

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Butte County CoC HMIS Data Quality Checklist	CHO Agency Name:	CHO Administrator Name:
	Program Name:	

CHO Administrator Data Quality Checklist

Instructions: For each HMIS Program active during the reporting quarter check (✓) the box to confirm the verification is complete. Fill in additional notes/comments and compliance issues as needed. Attach additional pages if necessary. Return this form to HMIShelp@buttecounty.net

HMIS Reports to assist		
1. *Monthly Staff Report [DQXX-103]*	4. *User Activity Report [STFF – 101]*	7. *Annual Performance Report [HUD – 227]*
2. *Duplicate Clients [DQXX – 110]*	5. *User Active Caseload Report [103]*	8. *Program Participation Summary [GNRL – 105]*
3. *Program Data Review [DQXX – 102]*	6. *HMIS Data Quality Report [HUD – 225]*	

Data Quality Type	*Yes*	*No*	*N/A*	*Notes*
Data entry errors are being corrected on a monthly basis to ensure the most up- to-date and complete data.				
Enrollment/Entry dates, services and exit dates have been entered into HMIS within **3 business days** of occurrence for **ALL** members of the household, including children.				
A thorough search for client(s) in the system is done before using "Add New Client" so as to not duplicate clients.				
Household members have been reviewed and data corrected in HMIS for all clients. (Household membership is correct and up to date)				
All current clients participating in program have a current/up to date *Informed Consent*, with all children under 18 included on the form.				
Contact and Location information are up to date for all current program clients. Staff confirm contact and location information with each client on a monthly basis.				

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Data Quality Type	*Yes*	*No*	*N/A*	*Notes*
Missing/unknown data in HMIS is less than 5% per month for required Universal Data Elements (UDE).				
Missing/unknown data in HMIS is less than 5% per month for required Program Specific Data Elements (PDE).				
Annual Assessments are being completed no more than 30 days before or after the anniversary of the client's *Project Entry Date,* regardless of the date of the most recent "Status Update." This creates a snapshot that updates income, non- cash benefits, and health insurance for clients enrolled in the program for a year or more.				
Status Assessments are completed anytime there is a change in a client's: 1. Disability 3. Non-Cash Benefits 2. Income 4. Health Insurance				
Clients who meet the HUD definition of homeless are entered into the Coordinated Entry System				
There is at least 1 service transaction per month per client.				
Usage of "Data Not Collected," "Client Refused," or "Client Doesn't Know" is infrequent and rare. (<= 5%)				
Emergency Shelters Only				
A "Homeless Verification Form" has been completed for each client and is saved in their program: 1. Night-by-Night, client allowed in during the day - one per enrollment. 2. Night-by-Night, client must leave during the day - one per night. 3. Entry/Exit - one per enrollment.				
Night-by-Night -A bed night was tracked for each client the night prior to their exit from the shelter.				
A "Current Living Situation Assessment" has been completed the same date as *Project Entry Date*				

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Outreach Programs Only				
Data Quality Type	***Yes***	***No***	***N/A***	***Notes***
A "Current Living Situation Assessment" has been completed the same date as *Project Entry Date.*				
A "Current Living Situation Assessment" is being completed at every client contact.				

Data Quality Issues Identified	***Corrective Action Taken to Resolve Data Quality Issue***

CHO Administrator Data Quality Checklist

I have verified that, (initial):

_____ Each End User accessing HMIS has read a the HMIS Manual.

_____ Each End User understands the Data Entry requirements of their program and is in compliance.

_____ _____ _____

CHO Administrator Name (Print) CHO Administrator Signature Date

_____ _____ _____

CHO Agency Director Name (Print) CHO Agency Director Signature Date

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