

Cambridge HMIS Privacy & Security Training

October 2020



Cambridge CONTINUUM
OF CARE

Agenda

1. Overview of training goals
2. Definition of Common Terms
3. Fundamentals of Privacy and Security
4. HMIS Governance
5. The Three Documents
6. The Three Step Privacy Process
7. Client Rights/Special Considerations
8. Sharing in Clarity: now and future

Required Reading

- Mandatory Data Collection/Privacy Poster
- CHMIS and C-CAN Client Consent Form
- Notice of Privacy Practices
- CHMIS Policies and Procedures Manual

Training Goals



#goals

Ensure that all End Users understand what HMIS is and its purpose

Ensure that all End Users understand privacy rules related to collection, management, and reporting of client data

Ensure End User understanding of the ROI process with their clients

- Obtaining informed consent from your clients
- Three important documents
- Data collection vs. Data Sharing

Common Terms

Term	Acronym	Definition
Continuum of Care	CoC	Planning body charged with guiding the local response to homelessness. The CoC is responsible for overseeing the HMIS Lead Agency in their operation of HMIS.
Homeless Management Information System	HMIS	A data system that meets HUD's HMIS requirements and is used to measure homelessness and the effectiveness of related service delivery systems. The HMIS is also the primary reporting tool for HUD homeless assistance program grants as well as other public streams of funding related to homelessness.
Clarity Human Services		HMIS software developed by vendor Bitfocus, Inc. and the software solution used by the Cambridge CoC to fulfill HUD's HMIS requirements.
Cambridge HMIS	CHMIS	The HMIS implementation for the Cambridge, MA Continuum of Care. CHMIS is operated by the Planning and Development Office of the City of Cambridge's Department of Human Service Programs.
Personally Identifying Information	PII	A category of sensitive information that is associated with an individual. It should be accessed only on a strict need-to-know basis and handled and stored with care.

More about PII

PII = Personally Identifiable Information

PPI = Personally Protected Information

Definition from the HMIS Data and Technical Standards:

“Any information maintained by or for a Covered Homeless Organization about a living homeless client or homeless individual that:

1. Identifies, either directly or indirectly, a specific individual;
2. Can be manipulated by a reasonably foreseeable method to identify a specific individual; or
3. Can be linked with other available information to identify a specific individual”

Examples:

- First and last name
- Date of birth
- SSN

What data are collected?

Thanks for asking!
It's all in this [manual](#).



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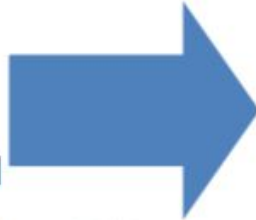
Why is HMIS important?

- Aggregate data from HMIS informs the Longitudinal Systems Analysis Report (LSA) that makes up the Annual Homeless Assessment Report (AHAR)
- CoCs are scored on HMIS in the annual NOFA
- CoCs must use HMIS to report annually on System Performance Measures
- Using HMIS informs policy and funding priorities
- Participating agencies have data on client characteristics and needs for funders and potential funders

Move to Systems Approach to End Homelessness

Moving from:

- Agency Performance
- Unique Agency Intake
- Planning in Silos
- Haphazard Decisions
- Housing Readiness
- Automatic Project Renewal
- Outdated Program Models
- Housing the Next In Line
- My Program



Transforming to:

- System Performance
- Coordinated Entry
- Data Integration
- Data Driven Decisions
- Housing First
- Higher Performing Program Funding
- Best Practices
- Prioritizing/Serving the most Vulnerable
- Our System

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Fundamentals of Data Privacy and Security!

What about Data Privacy and Security?

Collecting and sharing participants' personal information is often a necessary aspect of helping to resolve their housing crisis.

It is important for CoCs and providers to make informed policies and procedures and fully understand the following:

- How data are collected, used, stored and disclosed across our system of care
- Understand the responsibility to protect client information and be able to articulate those responsibilities to clients in a meaningful way

Data Privacy and Security Definitions

Data Privacy - Legal requirements and information practices that regulate the collection, storage and use of personal information. Data privacy measures ensure that a person whose information is being used and disclosed by another party is informed and has choice in how their information is used.

Data Security - the protection of personally identifiable information (PII) from unauthorized access, disclosure, use or modification.

Why are privacy and security important for HMIS?

Because HUD's mandate to have communities use HMIS requires collecting, storing and handling PII

[HMIS Data and Technical Standards](#) lay out federal standards aiming to “protect confidentiality...while allowing for reasonable, responsible and limited uses and disclosures of data.”

Cambridge's requirements are outlined in the [Cambridge Continuum of Care HMIS Policies and Procedures manual](#).

Data Collection vs. Data Sharing

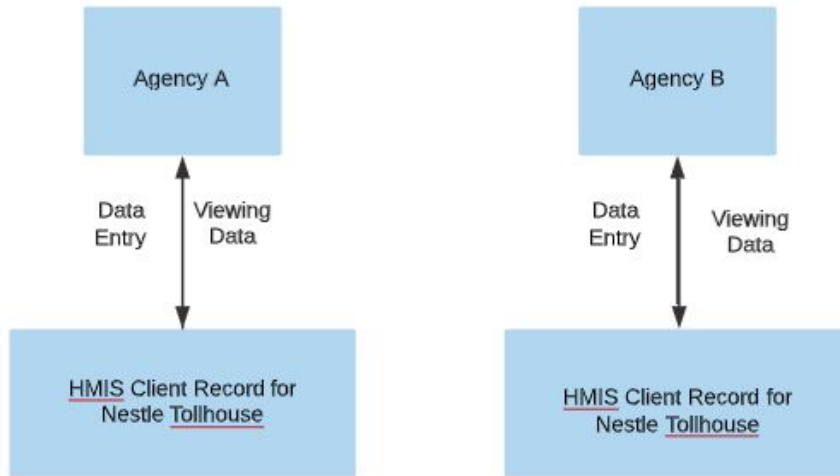
Data Collection in HMIS is required by HUD and important to the CoC. This is the collection of HMIS data elements through agency staff interviewing the client (usually at the start of their receiving services/intake) and entering it into Clarity. In turn, this data is stored and viewable only by staff at their agency.

Data Sharing in HMIS pertains to an agency adding data to Clarity for their client and, if needed, other agencies have the ability to view some of that data.

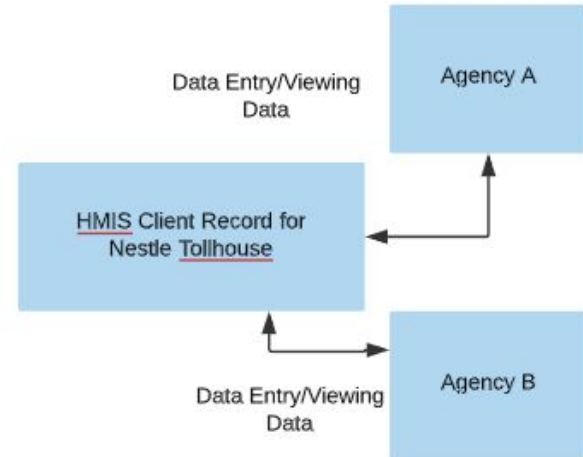
Presently, most agencies using Clarity (there are exceptions) share client profile data by default.

Data Collection vs. Data Sharing

Data Collection and Storage



Data Sharing



HUD Guidance on Client Consent

If a client's information is to be shared from one participating service provider to another participating service provider via HMIS, then consent to share which data, and with whom, should be obtained from the client. Therefore, if an HMIS is configured in such a manner that information entered into HMIS is automatically shared among participating service providers, then client consent should be obtained prior to entering the information into HMIS.

If a client declines to provide consent for sharing information, the information may still be entered into HMIS, however, administrative steps should be taken to prevent the information from being automatically shared among participating service providers upon entry.

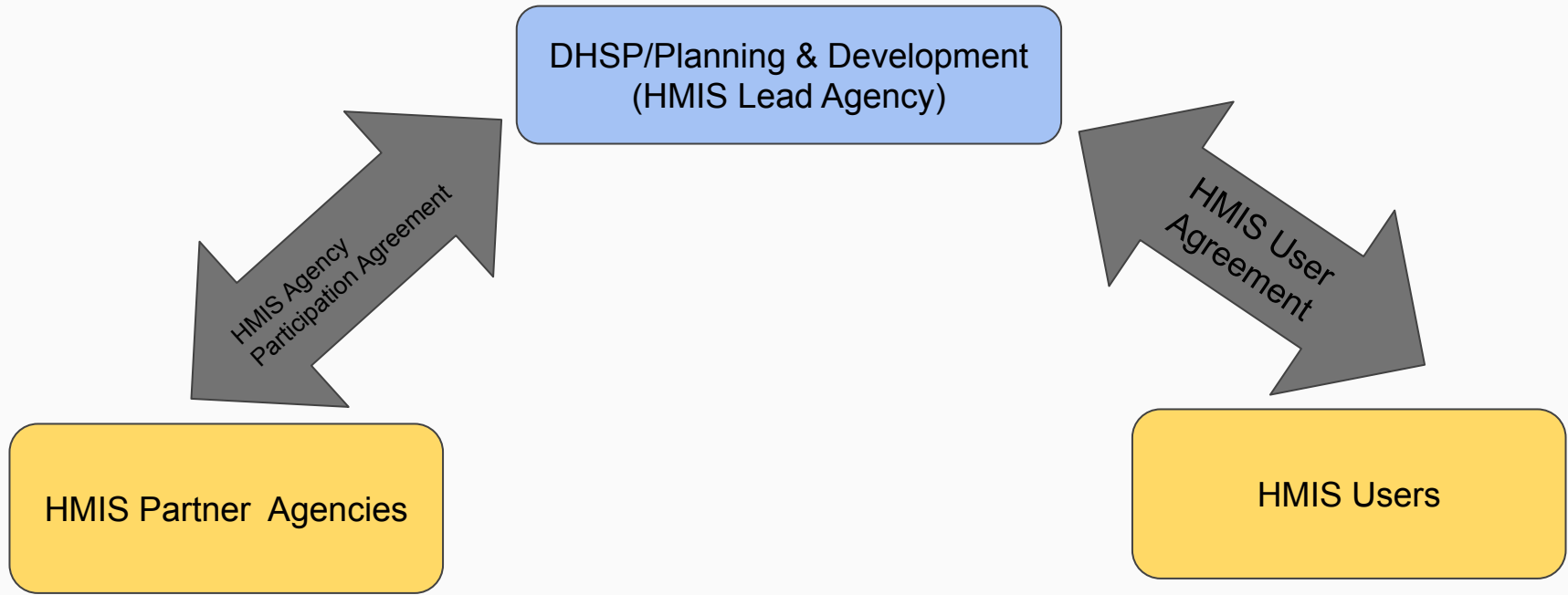
HMIS Governance!

Related entities



HMIS Policies and Procedures Flowchart

Partner Agencies and HMIS users both sign agreements formalizing their commitment to fulfill privacy, security and other requirements related to HMIS.



Responsibilities of the HMIS Lead

- Manage the HMIS for the CoC's geographic area, in accordance with the CoC Program Interim Rule and any HMIS requirements prescribed by HUD.
- Manages oversight of contract with vendor
- Provides activities and services to the CoC and HMIS end users
 - System Administration
 - Reporting and Analysis
 - Training and Technical Support
 - Coordinated Entry Support
 - Project Set Up
- Monitor and assess compliance for privacy and security

Partner Agencies - who are they?

- All the agencies that enter data into the cambridge.clarityhs.com that have signed a partner agency agreement and have a designated HMIS Agency Administrator.
- A network of providers in our CoC that share the same goals for their clients and therefore share data via HMIS records in order to:
 - Deduplicate records
 - Improve ability to coordinate services/enrollment in C-CAN
 - Help provide documentation of homeless episodes (shelter stays, outreach contacts)
 - Help to track the types of destinations that clients exit to when they stop receiving or no longer need services
- Updated list of Partner Agencies is available on our website:
cambridgecoc.org/hmis-participating-agencies

Partner Agency Responsibilities

- Review and sign HMIS Partner Agency Agreement
- Review and ensure compliance with HMIS Policies and Procedures
- Designate 1 HMIS Agency Administrator
 - Ensure compliance with HMIS procedures for collecting client data, including that staff comply with 3 step privacy process/workflow in Clarity
 - Report any suspected or real privacy or security incidents
 - Notify HMIS Lead Agency of personnel changes
 - Provide technical support

HMIS End User Responsibilities

- Review and abide by all requirements in HMIS Policies and Procedures
- Be able to articulate how the data you collect is stored and used
- Follow the protocol for privacy process of HMIS data
- Only enter and access data for purposes of delivering and coordinating services
- Maintain confidentiality of client data
- Enter data accurately, based on client self-report/do not misrepresent information
- Report observed security violations

The User Responsibility Statement and Code of Ethics

All users must sign one in order to have access

Signing is an agreement stating that you will abide by the policies and procedures associated with protecting the privacy, confidentiality and security of client level data

Security Reminders for All End Users

- Only use your own user credentials to login
- Always log out of Clarity when not using it
- Be mindful of your physical space; if there is a clear line of sight to your computer monitor, obtain a privacy screen.
- Use complex passwords; don't write your password down -- especially where it could be accessed
- Do NOT communicate PII via email or any other means -- use Clarity Unique IDs when corresponding or internal Clarity messaging
- Lock any hard copy HMIS records (file cabinet/locked office)
- Do not share HMIS data with organizations outside of the partner agencies

Are you working remotely?

Read this:

[Maintaining Client Data Privacy and Security While Working from Home](#)

From our vendor, Bitfocus, Inc.

Three (3) documents
pertain to this process!

3 Documents

1. The Mandatory Data Collection/Privacy Poster (DESK SIGN)
2. The Client Release of Information (CHMIS/C-CAN Consent Form)
3. The Notice of Privacy Practices (longer, more detailed document)



Mandatory Data Collection/Privacy Poster



- Aka Desk Sign - Must be visibly posted at all client intake areas in order to be visible to clients
- Part of the Informed Consent process:
 - The poster informs clients that their info is being collected and stored in HMIS
 - It also informs clients that they may request a copy of our Notice of Privacy Practices for more information
 - If they are seeking more information, you will supply the Notice and should be prepared to answer questions on this subject
- Available in other languages on our website

Client Release of Information

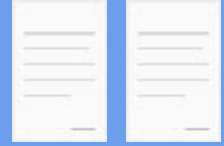


Take time right now to read the *new* Client Release of Information located here: <https://cambridgecoc.org/client-forms/>

This is a comprehensive document meant to inform the clients in plain language why we collect and how we may use their data.

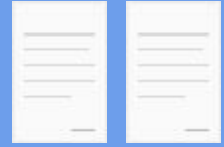
The sharing we refer to is more extensive than what we actually share now, with the goal of expanding sharing across agencies once this ROI is more established.

Notice of Privacy Practices



- In short, the Privacy Notice informs the client (in more detail than the ROI):
 - Why data is being collected
 - Potential uses and disclosures
 - Types that require their permission
 - Types that do not require their permission
 - Their privacy rights around collected data
 - How to submit a grievance

Some of the Types of Uses and Disclosures



Uses and disclosures
required by law

Uses and disclosures
to avert a serious
threat to health or
safety

Uses and disclosures
about victims of
abuse, neglect or
domestic violence

Uses and disclosures
for research purposes

Uses and disclosures
for law enforcement
purposes.

Three Step Privacy Process

Memorize these
Make them habitual
They are part of your workflow

3 Important Steps to Client Consent

Step 1

The Desk Sign

The mandatory data collection notice should be posted where ever you complete intakes/work with clients

Step 2

Check HMIS first

Consent is universal, so check Clarity to see if the client already has a current consent on file.

If not...Step 3

Step 3

Obtain Consent

Enter the ROI documentation into Clarity. (Show your work -- either you received a yes for sharing, or the client did not sign, in which case *you will still sign* and upload the form.

Client Rights Special Considerations

Client Rights

1 | Give or refuse consent - (choice)

When an individual decides not to opt in, an agency cannot deny them services solely for that reason.

2 | Refuse to answer individual questions

A client has the right to refuse to answer certain questions, even if they agree to participate in HMIS.

3 | Access to their data

The client has the right to see what the case manager is entering into their record and obtain copies

Client Rights

4 | Right to revoke consent

They do this by completing a Revocation of Consent Form.

5 | Right to paper copies of ROI, Privacy Notice

A client can ask for a copy of the ROI, the Privacy Notice or a list of the Partner Agencies.

6 | File a grievance

Without retaliation from the agency, the client has a right to file a grievance with them. If not satisfied they may send a written appeal to P&D using the Grievance Form..

Client Consent Considerations - Competency

Court Order



Apparent confusion



Sobriety



Does your client have more questions or concerns?

If you've gone over the consent form with your client and they still have questions:

- Take extra time with them to make sure they are informed
- If helpful, offer the Notice of Privacy Practices document
- Ask your HMIS Agency Administrator for help if needed
- Email or call Marianne Colangelo if there are still unanswered questions

What we share now

Client Profile

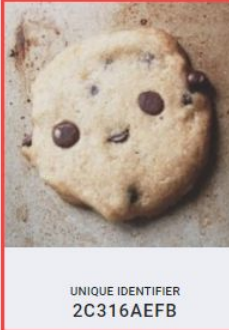
Sharing the data points on this screen is the way we are able to report unduplicated counts in various reports. This allows us to have one record for each client.

Nestle Tollhouse

PRG HIST SERVICES PROGRAMS ASSESSMENTS FILES CONTACT LOCATION

CLIENT PROFILE

Social Security Number	XXX - XX - 1111	
Quality of SSN	Full SSN Reported	▼
Last Name	Tollhouse	
First Name	Nestle	
Quality of Name	Full name reported	▼
Quality of DOB	Full DOB Reported	▼
Date of Birth	01/16/1954	Adult. Age: 66
Middle Name	Suffix None	▼
Alias	Chewy	
Gender	Female	▼
Race	Black or African American, White	▼
Ethnicity	Non-Hispanic/Non-Latino	▼
Veteran Status	No	▼



UNIQUE IDENTIFIER
2C316AEFB

SAVE CHANGES CANCEL

C-CAN Enrollment and Queue Info


If clients enrolled in C-CAN have signed a consent form, then information about their C-CAN enrollment is viewable to HMIS users at other agencies.

Baked Granola

PROFILE HISTORY PROGRAMS FILES CONTACT LOCATION NOTES

CLIENT PROFILE

Social Security Number	XXX - XX - 1212
Quality of SSN	Full SSN Reported
Last Name	Granola
First Name	Baked
Quality of Name	Full name reported
Quality of DOB	Full DOB Reported
Date of Birth	12/18/1974
	Adult. Age: 45
Middle Name	Fresh Suffix None
Alias	Gorpy
Gender	Male
Race	Native Hawaiian or Other Pacific Islander



UNIQUE ID: 72E37AAr

COMMUNITY QUEUE

Client has an active entry on the Community Queue: Default

Baked Granola

PROFILE HISTORY PROGRAMS FILES CONTACT LOCATION NOTES

PROGRAM HISTORY

Program Name	Start Date	End Date	Type
Cambridge CAN Coordinated Entry Coordinated Access ⓘ	08/07/2020	Active	Individual
Emergency Service Center - Shelter Emergency Shelter: Night-by-Night CASPAR, Inc. (Your program)	07/22/2020	Active	Individual

What we will share in the future

Service/Programs/Assessments Placed

Basic Shared

You can see other agency's program enrollments for your client - start/end dates, assessment names, dates, bed night ranges. You will not see assessment answers.

Notes

Not Shared

Files

Not Shared

Coordinated Access will be able to share files with Housing Provider agencies

Location

Not Shared

Contact

Full Shared

SAVE CHANGES

CANCEL

Review of key points

Review of Important Content

Collecting the ROI is your responsibility when performing intakes. Informed Consent is dependent on you, in your role as the informer.

Your work area (where you see clients) must have a desk sign

Know the difference between data collection and data sharing

Our consent form is seeking permission to *share* data across agencies, not collect data

Part of the consent workflow includes you signing the ROI to certify that you went through this process with your client

Memorize this Privacy Process

1. Have the mandatory Data Collection Notice (HMIS Privacy Poster) posted where you meet clients.
2. **Check Clarity first** for your client's record.
3. Complete the consent process with new clients or those who do not already have consent recorded in Clarity.

Have a copy of the Notice of Privacy Practices (longer document) available for any client that has questions/wishes to know more. Be prepared and open to discussing this with them if needed.

Thank you!

Contact: Marianne Colangelo

Cambridge HMIS
Planning & Development Office
Cambridge, MA 02139
cambridgecoc.org

mcolangelo@cambridgema.gov

617-349-6966



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