

City of Cambridge  
Homeless Management Information System (HMIS)

# POLICIES & PROCEDURES

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City of Cambridge Department of Human Service Programs  
Planning & Development Division  
51 Inman Street, 2nd Floor  
Cambridge, MA 02139

## Revision History

<b>Date</b>	<b>Author</b>	<b>Description</b>
10/19/2011	DHSP, P&D	First draft to be distributed to HMIS Committee
11/10/2011	DHSP, P&D	Draft for distribution to full HSPC
12/30/2012	DHSP, P&D	Glossary of terms added
1/13/2014	DHSP, P&D	Removal of HPRP and PULSE references; addition of ESG CAPER information; replaced SHP & SPC with CoC
12/8/2014	DHSP, P&D	Updated to reflect 2014 Data Standards
6/27/2016	DHSP, P&D	Updated to reflect change in data elements (2015), HMIS Vendor, Client Consent procedure and System Performance Measure report requirement.

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# 1 PROJECT OVERVIEW

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The purpose of the Cambridge Homeless Management Information System (CHMIS) is to provide a robust and comprehensive system for collecting and disseminating information about persons experiencing homelessness and the homelessness service system in the City of Cambridge. The long-term vision of HMIS is to enhance Partner Agencies' collaboration, service delivery and data collection capabilities. Accurate information will put the City of Cambridge Continuum of Care (CoC) in a better position to plan for future needs and meet the reporting requirements of the U.S. Department of Housing and Urban Development (HUD).

The mission of the Cambridge Continuum of Care HMIS is 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 and services. This system will meet Federal requirements and also enhance service planning and delivery.

The fundamental goal of HMIS is to document the demographics of homelessness in Cambridge according to the HUD HMIS Data Standards (updated in 2014). The project aims to identify patterns in the utilization of assistance, and document the effectiveness of services for clients. This will be accomplished through analysis of data that are gathered from the actual experiences of individuals and families experiencing homelessness and from the service providers who assist them in shelters and homeless assistance projects throughout the City.

Data that are gathered via intake interviews and project participation will be used to complete HUD Annual Performance Reports and, more broadly, will inform system-level performance measure reports on the Cambridge CoC as a community wide system of care. These data may also be analyzed to provide unduplicated counts and anonymous aggregate data to various stakeholders in the Continuum of Care. The HMIS project utilizes a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the City. Access to the web-based application is limited to agencies formally participating in the project and then only to authorized staff members who meet the necessary training and security requirements.

The City's Planning and Development Division within the Department of Human Service Programs (DHSP) staffs and is the lead agency for HMIS. DHSP Grant Managers are the authorizing agents for all agreements made between Partner Agencies and DHSP. HMIS Project Staff are responsible for the administration of the web-based application and user access. HMIS Project Staff also provide technology, training and technical assistance to users of the system throughout the City.

The HMIS Working Group provides oversight and guidance to HMIS. This group is committed to balancing the interests and needs of all stakeholders involved: individuals and families experiencing homelessness; service providers; case managers and end users; funders; and policymakers.

Potential benefits of HMIS include:

- Improved service coordination when information is shared among case management staff within one agency or with staff in other agencies (with written client consent) who are serving the same clients;
- Aggregated information that can be used to develop a more complete understanding of clients' needs and outcomes, and then used to advocate for additional resources, complete grant applications, conduct evaluations of project services, and report to funding agencies such as HUD;
- Capacity to generate HUD Annual Performance Reports (APRs) for Continuum of Care grants and Consolidated Annual Performance and Evaluation Report (CAPER) reporting for Emergency Solutions Grants (ESG) (specifically CR-65 ESG Persons Assisted), as well as other HUD reports such as the Annual Homeless Assessment Report to Congress (AHAR), Housing Inventory Count (HIC), and System Performance Measures
- In accordance with the HEARTH Act, data will contribute to the whole of the CoC in order to track and analyze system level performance. Therefore, aggregated data are used to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

## 2 GOVERNING PRINCIPLES

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The overall governing principles upon which all decisions pertaining to HMIS are based are described below. Participants are expected to read, understand and adhere to the spirit of the principles, even when the Policies and Procedures do not provide specific direction.

### **Confidentiality**

The rights and privileges of clients are crucial to the success of Cambridge's HMIS. These policies will ensure clients' privacy without impacting the delivery of services, which is the primary focus of agencies and projects participating in HMIS.

Policies regarding client data are founded on the premise that a client owns his/her own personal information and provide the necessary safeguards to protect client, agency and policy level interests. Collection, access and disclosure of client data through HMIS will only be permitted by the procedures described in this document.

### **Data Integrity**

Client data are the most valuable and sensitive asset of HMIS. These policies will ensure integrity and protect this asset from accidental or intentional unauthorized modification, destruction or disclosure.

### **System Availability**

The availability of a centralized data repository is necessary to achieve the ultimate citywide aggregation of unduplicated homeless statistics. HMIS Project staff are responsible for ensuring the broadest deployment and availability for homeless service agencies in the City of Cambridge.

### **Compliance**

Violation of the policies and procedures described in this document will have serious consequences. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity will result in the withdrawal of system access for the offending entity.

# 3 ROLES AND RESPONSIBILITIES

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## City of Cambridge Continuum of Care

### CoC HMIS Committee

- Project direction and guidance
- Approval of project forms and documentation
- Project participation and feedback

## City of Cambridge, DHSP

### Planning and Development Division

- Lead agency for HMIS administration and overall responsibility for project
- Project funding
- Liaison with HUD
- Project Staffing
- Procurement of software and licenses
  - Selection of system software
- Manage contract with software vendor
- User Administration
  - Add and remove partner agency HMIS administrators
  - Manage user licenses
- Creation of project forms and documentation
- Project policies and procedures compliance
- Signatory for Memorandums of Understanding
- Keeper of Signed Memorandums of Understanding

### Training Coordinator

- Adherence to HUD Data Standards
- Application customization
- Curriculum development
- Training documentation
- Confidentiality training
- Application training for Agency Administrators and End Users
- Outreach/end user support
- Training timetable
- Helpdesk

### Data Analyst

- Adherence to HUD Data Standards
- Application customization
- Data monitoring
- Data validity
- Aggregate reporting and extraction
- Assist Partner Agencies with agency-specific data collection and reporting needs (within reason and within constraints of other duties)

## **Partner Agency**

Any agency, group, or other entity that has completed an Agency Agreement with DHSP is a Contributory HMIS Organization (CHO), or Partner Agency. All Partner Agencies must abide by all policies and procedures outlined in this manual, which are subject to change. Partner Agencies must complete an Agency Agreement with DHSP before gaining access to HMIS. Partner Agencies are responsible for the conduct of their End Users and the security of End User Accounts.

### **Partner Agency Executive Director**

- Authorizing agent for Partner Agency Agreement
- Designation of HMIS Agency Administrator
- Agency compliance with Policies & Procedures
- Each Partner Agency is responsible for ensuring they meet the Privacy and Security requirements detailed in the HUD HMIS Data and Technical Standards. Annually, Partner Agencies will conduct a thorough review of internal policies and procedures regarding HMIS.

### **Partner Agency Administrator**

Each Partner Agency will designate an HMIS Agency Administrator to serve as primary contact between DHSP and the Partner Agency, and send that person's name and contact information to HMIS Project Staff. Changes to that information should be promptly reported to DHSP. HMIS Agency Administrators are responsible for:

- Project compliance with Policies & Procedures
- Authorizing agent for Partner Agency User Agreements
- Keeper of Executed Client Informed Consent forms
- Authorizing Agent for User ID requests
- Staff workstations
- Internet connectivity
- End user adherence to workstation security policies
- Detecting and responding to violations of the Policies & Procedures
- First level end user support
- Maintain agency/project data in HMIS application
- Authorizing agent for Data Quality Monitoring

### **Agency Staff**

- Safeguard client privacy through compliance with confidentiality policies
- Data collection as specified by training and other documentation

## **Non-Cambridge HMIS Partner Agency**

Agencies using a comparable HMIS must either provide DHSP access to their HMIS system, or submit data to DHSP on at least a quarterly basis. Data should be submitted in the .csv format specified by HUD (see [HMIS Comma-Separated Value Format Specifications v 4.1](#)). Non-Cambridge HMIS Partner Agencies must assign a staff member to be the primary point of contact with HMIS Project Staff.

# 4 OPERATING PROCEDURES

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## 1. Security and CHMIS Access

Bitfocus, Inc. will host the CambridgeHMIS Clarity Human Services Software. Each Agency is responsible for providing and maintaining computer hardware and Internet service. Each administrative staff or end user that a participating agency determines will have access to Clarity Human Services' Software will be issued a user license (login ID and password) once the initial training is complete and the *CHMIS Partner Agency User Agreement Form* has been signed.

### (a) End User Accounts

HMIS Project Staff will provide an End User Account username and initial password to each authorized End User once the initial HMIS training has been completed and the CambridgeHMIS Partner Agency User Agreement Form has been signed. End User Accounts are assigned on a per-person basis, rather than to a particular position or role. End User Accounts are not to be exchanged, shared, or transferred between personnel at any time. Sharing of End User Accounts is a breach of these Policies and Procedures and a violation of the *Partner Agency Agreement* and the *Partner Agency User Agreement Form*.

Under no circumstances shall a Partner Agency demand that an End User hand over his or her username and password. Partner Agency's shall inform the Technology Director of any changes in personnel or other requests to revoke or transfer accounts.

Licenses and access to Clarity Human Services Software will be cancelled immediately for any staff that terminates employment or changes roles where software access is no longer required. The Participant's Agency Administrator will notify the CHMIS System Administrators of staff changes within seven (7) business days.

### (b) End User Inactivity

End Users who have not logged into the system in the previous 90 days will be flagged as inactive. Inactive End Users may have their CHMIS accounts locked or removed to maintain the security, confidentiality, and integrity of the system.

### (c) User Access Levels

The Partner Agency shall designate one User to be the Agency Manager, identify and approve their respective users, and determine Clarity Software user access level for their respective users. The level will be based on each user's job function as it relates Clarity Software's data entry and retrieval schema. HMIS Project Staff will aid in the determination of HMIS User access level when requested.

### (d) Passwords

End User Account passwords should never be written on any item left in their office, desk, or other workspace, and passwords should never be in view of any other person.

### (e) Connectivity and Computer Systems

Partner Agencies will connect to CHMIS independently via the internet and are responsible for providing their own secure internet connectivity and computer systems sufficient for doing so. HMIS Project Staff may provide consultation or advice in securing sufficient internet connectivity and computer systems. HMIS Project Staff provides technical support to Partner Agency's solely for CHMIS.

### (f) Workstation Security

At a minimum, the primary workstation used by each End User to log in to CHMIS should be configured to meet the following best practices:



- Password-protected log on for the workstation itself;
- Password-protected (aka locked) screensaver after five minutes or more of inactivity;
- Operating system updated with manufacturer's latest patches at least weekly;
- Ports firewalled;
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- Systems scanned at least weekly for viruses and malware.

HMIS Project Staff may provide some recommendations or advise in pursuing these best practices, but proper workstation configuration remains the responsibility of each Partner Agency.

**(g) Local Data Storage and Transfer**

Partner Agency Users are responsible for maintaining the security and confidentiality of any client-level data extracted from the database and stored locally, including all data used in internal reporting. No identifiable client-level data is to be transmitted unless it is properly protected. Security questions should be addressed to HMIS Project Staff.

**(h) Remote System Access**

Users working off site using an agency's portable device must only access HMIS using a secure, password-protected, non-public wi-fi connection. Partner Agencies and End Users must abide by these Policies and Procedures and ensure the security and confidentiality of client data regardless of the computer used to log in to the system. For this reason, End Users are strongly cautioned against extracting and storing personally identifiable client information on their own personal computers and internet devices.

**(i) Client Access to Records**

Clients may not be denied access to their own records. Clients have the right to see their information contained in Clarity Software. If a Client requests, the Participant/User must review the information with the client.

**(j) Training**

HMIS Project Staff will coordinate adequate and timely training for all End Users prior to issuing an End User Account. Additionally, HMIS Project Staff will post training aids, reference material, and other support in the HMIS section of the Cambridge CoC website (<http://cambridgecoc.org/hmis/>)

## 2. Data Collection and Entry

**(a) Standard Data Collection**

It is the responsibility of Agencies and respective users to ask for all required data elements (Universal Data Elements and Program-Specific Data Elements) from each client entered into the HMIS. Complete and accurate data is essential to the system's success; however it is important to note exceptions:

- Clients may refuse to provide information without being denied services.
- In the case where there is a conflict with collecting data and the provision of quality services and/or client safety, providers should not enter personal identifying information.

Although each participant will use the HMIS in various capacities, the minimum data fields required for all providers regardless of funding source are detailed in Table A below. HUD has mandated these universal data elements for all clients entered into a HMIS. For providers receiving HUD McKinney funding (CoC and ESG) there are additional program specific data elements which are detailed in Table B. Please refer to the [2014 HMIS Data Standards Manual](#), for more information on data elements required by HUD and other federal partners. Other Local Data Elements (LDE) and data collection protocols will be set by the HMIS Lead Agency as-needed for adequate data analysis and meeting objectives of local plans.

**Table A: Universal Data Elements**

The following HUD-mandated Universal Data Elements will be collected for the purposes of unduplicated estimates of the number of homeless people accessing services from homeless providers, basic demographic characteristics of people who are homeless, and their patterns of service use.

1	Name	10	Project Entry Date
2	Social Security Number	11	Project Exit Date
3	Date of Birth	12	Destination
4	Race	13	Personal ID*
5	Ethnicity	14	Household ID*
6	Gender	15	Relationship to Head of Household
7	Veteran Status	16	Client Location
8	Disabling Condition		
9	Living Situation		

\*System generated

**Table B: Program Specific Data Elements for HUD CoC and ESG Funded Projects**

The following Program-Specific Data Elements will be collected for projects that are required to report to HUD and other organizations. Other agencies without this reporting requirement may also collect these elements to facilitate a better understanding of the homeless population in the City of Cambridge.

1	Income and Sources	9	Substance Abuse
2	Non-Cash Benefits	10	Domestic Violence
3	Health Insurance	11	Contact
4	Physical Disability	12	Date of Engagement
5	Developmental Disability	13	Bed Night Date (ESG Night by Night projects only)
6	Chronic Health Condition	14	Residential Move-In Date (Rapid Rehousing projects only)
7	HIV/AIDS	15	Housing Assessment Disposition
8	Mental Health Problem	16	Housing Assessment at Exit (Prevention projects only)

**Service and Shelter Records** includes Bed Register and ESG-specific service fields (if applicable).

**Extended Data** are optional and include Case Notes, Referrals, Goals, Action Steps, Follow-Up Plans, and Self-Sufficiency Matrix measurements.

**(b) Informed Client Consent**

Partner Agencies post a Data Privacy Notice in all areas where client intakes are conducted.

Agencies will collect and retain signed client consent forms before any client data will be entered into the CHMIS. Partner Agency staff will thoroughly explain the client consent to each client.

CHMIS will provide a standard *CHMIS Agency Authorization for Release of Information form* to all Partner Agencies. If client consent is not obtained, the Partner Agency will enter the de-identified data into an anonymous client record that is minimally necessary for the purposes of tracking of units of service. Clients cannot be denied services if consent to data collection is not given.

CHMIS will provide a *Client Consent Information Sheet and Client Consent Form* to review with client in order to obtain authorization to share basic identifying information with other participating providers of the CHMIS in Clarity. If a client does not grant such authorization, then the client profile record will be marked "private" and therefore not be shared.

**(c) Appropriate Data Collection**

CHMIS End Users will only collect, enter or access Clients in the HMIS that exist as Clients under the User's area of service. End Users will only collect data relevant to the delivery of services to people experiencing a housing crisis in the City of Cambridge.

**(d) Additional Data Elements**

Data element customization will be provided as needed, e.g. special projects such as preventive homeless projects in which the HMIS database is used for this data collection. Data customization will only be done after approval by and under the direction of HMIS Project Staff.

### 3. Quality Assurance

**(a) Commitment to Data Quality**

Partner Agencies are responsible for timely, accurate, and complete entry of client-level data.

**(b) Data Element Completion**

For each type of data element, the following completion rates are expected.

Data Element Type	Element Completion (overall completion per element)		
	Low	Minimum	Target
Universal Data Element (UDE)	<90%	90%	98%
Program Specific Data Element	<85%	85%	95%

**(c) Data Integrity Expectations and Support**

To ensure high quality data and ease in the generation of reports and analysis, the following data integrity expectations and supports will be observed:

- Data will be entered in a timely manner, within 5 working days following client contact.
- The Cambridge HMIS Committee will approve (and update as needed) a Data Quality Monitoring Plan that will define expectations for timeliness, accuracy and completeness of data, and establish timelines for monthly data quality monitoring.
- Attention to accuracy of participants' project entry and exit dates
- HMIS Staff will provide support to Partner Agencies as-needed for corrections of data.

### 4. Data Retrieval

**(a) Partner Agencies**

Partner Agencies will have access to retrieve any client-level data entered by their projects, other data as defined by the data sharing policies and procedures in this manual, and by the *CHMIS Informed Consent and Release of Information Authorization Form*.

**(b) HMIS Project Staff**

HMIS Project Staff will have access to retrieve all data in the CHMIS. HMIS Project Staff will not access individual client data for purposes other than maintenance, troubleshooting, providing reports, and checking for data integrity.

**(c) Bitfocus, Inc.**

Bitfocus will not access the system except for purposes of software maintenance, troubleshooting, and data conversion.

**(d) Client**

Any client will have access to view, or keep a printed copy of, his or her own records contained in the CHMIS within a reasonable period of time. No client shall have access to another client's records in the CHMIS.

**(e) Continuum of Care**

HMIS Project staff will provide de-identified and aggregate reports to the Continuum of Care as-needed in support of its mission to prevent, reduce, and eliminate homelessness.

**(f) Public**

CHMIS, in consultation with the HMIS Working Group, will address all requests for data from entities other than Partner Agencies or clients. No client-level data will be provided to any party, even a client requesting their own data, unless the Partner Agency who entered the data is unable to satisfy the client's request. All requests from the public for HMIS reports must be made in writing. HMIS Project Staff will compile and publish certain periodic reports for public consumption regarding homelessness and housing issues in the City of Cambridge based on data available in HMIS. At no time will published, publicly-available reports contain client-level or identifiable data.

**(g) Ethical Data Use**

Data contained in the CHMIS will only be used to support the delivery of homeless and housing services in Cambridge. Each HMIS End User will affirm the principles of ethical data use and client confidentiality contained in this Policies and Procedures Manual and the *HMIS User Agreement*.

**(h) Access to Core Database**

No one will have direct access to the CHMIS database. Access is provided solely through the Bitfocus, Inc.

# 5 GLOSSARY

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- **Continuum of Care (CoC) Lead** – The primary decision-making entity of the CoC.
- **Contributory HMIS Organization (CHO)** – Organization that operates a contributory homeless assistance project and/or a contributory non-homeless assistance project.
- **Contributory Project** – A project, operated by a CHO, that contributes Protected Personal Information (PPI) or other client-level data to an HMIS.
- **Non-Contributory Project** – A project that does not contribute PPI or other client-level to an HMIS.
- **Homeless Assistance Project** – Project, identified by CoC as part of its homeless assistance system, whose primary purpose is to meet specific needs of people who are homeless.
- **Unduplicated Accounting of Homelessness** – Measure of extent and nature of homelessness, utilization of homeless projects over time, and effectiveness of homelessness projects.
- **HMIS Lead Agency (HMIS Lead)** – Organization designated by a CoC to operate the CoC’s HMIS.
- **End User** – An employee, volunteer, or other person affiliated with a CHO who uses or enters data in the HMIS or other administrative database from which data are periodically uploaded to the HMIS.
- **HMIS Vendor** – A contractor who provides HMIS software and/or support services for the operation of a CoC’s HMIS.
- **HMIS Participation:**
  - Projects must attempt to record all the universal data elements on all clients served and disclose to HMIS Lead at least once annually
  - All homeless assistance projects that receive funding through the CoC or ESG programs are mandated to participate
  - Victim Service Providers (as defined by VAWA) are excluded from disclosing PPI to HMIS