# Maine Homeless Management Information System (Maine HMIS)

# Policies and Procedures Manual

July 2017

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## 2    About this Document

In 2004, the Department of Housing and Urban Development (HUD) put forth rules regarding requirements for recipients of HUD related funding and other providers of services for the homeless to collect electronic data on their homeless clients through the Homeless Management Information Systems (HMIS).  The State of Maine Homeless Management Information System (Maine HMIS) is a collaborative effort between MaineHousing, the dedicated lead agency, and the Maine Continuum of Care (MCoC).  The MCoC has an ongoing role in ensuring the success of Maine's HMIS by giving input into HMIS policy decisions within the parameters established by HUD.

MaineHousing is also part of the New England Regional Homeless Management Information System (NERHMIS). By being a member in NERHMIS the Maine HMIS benefits from shared knowledge of the various New England members.

This manual contains information and procedures related to the Maine HMIS. The purpose of this document is to provide for uniform technical requirements of HMIS, for proper collection of data and maintenance of the database, and to ensure the confidentiality of the information in the database. HMIS Governance Standards (§ 580.31)

The importance of the integrity and security of HMIS cannot be overstated. Given such importance, it is equally important that HMIS is administered and operated under high standards of data quality and security. To strive to meet this objective, this section requires the HMIS Lead to adopt policies and procedures for the operation of its HMIS. These policies and procedures must not only meet HUD standards, but policies and procedures must meet applicable state or local governmental requirements

In addition to the Policies and Procedures listed here, all Maine HMIS Participating Agencies must make themselves knowledgeable of, and adhere to, all of the requirements and directives outlined in the following documents if applicable to their agency:

- The Agency Participation Agreement;
- User Policy and Agreement;
- The Maine HMIS Governance Model;
- The Maine HMIS Data Quality Plan and Best Practices Guide;
- The Maine HMIS Data Sharing Agreements;
- The HUD HMIS Data Standards Manual (https://www.hudexchange.info/resources/documents/HMIS- Data-Standards-Manual-2017.pdf);
- The HMIS Data Dictionary (https://www.hudexchange.info/resources/documents/HMIS-Data-Dictionary-2016.pdf);
- and the HUD 12/09/2011 Proposed Rule of Homeless Management Information Systems Requirements (https://www.federalregister.gov/documents/2011/12/09/2011-31634/homeless-management-information-systems-requirements).  Note: The mandates within the Final Rule of the Homeless Management Information System Requirements will need to be in place within six months of the rule being finalized.

Additional resources and information pertaining to Maine HMIS, and the above mentioned documents, can be found at https://mainehmis.org.

For more information regarding HMIS policies and procedures, please contact [HMIShelp@mainehousing.org](mailto:HMIShelp@mainehousing.org).

# 3    Roles and Responsibilities

## 3.1    Maine Continuum of Care (MCoC)

A CoC is a group composed of representatives from organizations including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, participating agency districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve veterans, and homeless and formerly homeless persons organized to carry out the responsibilities of a Continuum of Care established under 24 CFR part 578.

The MCoC is responsible for ensuring that the HMIS for the CoC is operated in accordance with any current regulations and applicable Federal, state, and local laws and ordinances.

COCs can apply to HUD for McKinney-Vento funding. Local agencies wishing to access these funds must do so through their local CoC's application for funding. HUD requires that every CoC work together to implement a shared data system designed to provide an un-duplicated count of homeless individuals, provide information on the number of people who are homeless, related demographics, and their needs over time.  In Maine, this work is accomplished by the MCoC. For additional information and detail please refer to [www.mainehomelessplanning.org](http://www.mainehomelessplanning.org). This site assists with the year round planning process for the MCoC, the Point in Time Annual Count (PIT), ongoing Data Analysis and Performance Measures, and captures details about the outcomes of Maine's Plan to End and Prevent Homelessness.

*To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the MCoC must:*

(a) Designate a single information system as the official HMIS software for the geographic area. The software must comply with    federal requirements.

(b) Designate an HMIS Lead, which may be itself, to operate the HMIS. The HMIS Lead must be a state or local government, an instrumentality of state or local government, or a private nonprofit organization.

(c) Develop a governance charter, which at a minimum includes:

> (i) A requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Participating Agency requiring the Participating Agency to comply with this part and imposing sanctions for failure to comply;

> (ii) The participation fee charged by the HMIS; and

> (iii) Such additional requirements as may be issued by notice from time to time.

(d) Maintain documentation evidencing compliance with this part and with the governance charter; and

(e) Review, revise and approve the policies and plans (required by this part and by any notices issued from time to time.

## MCoC Key responsibilities, as detailed in the Maine HMIS Governance Model include:

- Ensures that activities related to HMIS growth and use are developed, reviewed regularly, and are in accordance with the CoC's goals.
- Identifies general milestones for project management, including training, expanded system functionality, etc.
- Ensures the HMIS generates other client served, utilization summary, and demographic reports both at the system and program levels for purposes of understanding the nature and extent of homelessness in the CoC.
- Regularly monitors the HMIS Lead/Grantee on adherence to the agreement.
- Ensures membership of the HMIS Advisory Council is inclusive of decision makers representing the CoC.
- Ensures that the HMIS is managed in accordance to CoC policies, procedures, and goals.
- Regularly monitors program and agency-level participation in HMIS
- Ensures participation in the NOFA (Notice of Funding Availability), AHAR (Annual Homeless Assessment Report), PIT (Point in Time), and HIC (Housing Inventory Chart).
- Develops and enforces community level data quality plan and standards.
- Ensures the collection of each data variable and corresponding response categories on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating projects.
- Ensures the collection of each data variable and corresponding response categories specific to their program type on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating programs.
- Regularly reviews data quality reports at community planning level on data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.
- Provides training and regularly reviews the progress of the Community Planning Goals and Objectives.
- Ensures the HMIS Lead has adopted a drug-free workplace policy.  The policy is posted and available for review.
- Participation can include but is not limited to Advisory Council leadership, advisory committees, staff positions, and sub-committee positions.
- The HMIS Grantee has adopted a conflict of interest policy for board members, staff, and volunteers.
- The HMIS Grantee has adopted an equal opportunity and non-discrimination policy.


### 3.1.1    Advisory Council
The Maine HMIS Advisory Council (Advisory Council) is made up of Participating Agencies from the MCoC, and the Lead Agency.

## Advisory Council key responsibilities as detailed in the Maine HMIS Governance Model include:

- Ensures that activities related to HMIS growth and use are developed, reviewed regularly, and are in accordance with the CoC's goals;
- Identifies general milestones for project management, including training, expanded system functionality, etc.;

- Ensures a HMIS governance model is developed and formally documented between the HMIS Lead Agency/grantee and the community planning body(ies). Ensures that a formal agreement that outlines management processes, responsibilities, decision-making structures, and oversight of the HMIS projects has been executed;
- Manages and maintains mechanisms for soliciting, collecting, and analyzing feedback from end users, program managers, agency executive directors, and homeless persons. Feedback includes impressions of operational milestones and progress, system functionality, and general HMIS operations. Examples of feedback include satisfaction surveys, questionnaires, and focus groups;
- Ensures that the HMIS is managed in accordance to CoC policies, procedures, and goals;
- Develops and enforces community level data quality plan and standards;
- Ensures the collection of each data variable and corresponding response categories on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating projects;
- Ensures the collection of each data variable and corresponding response categories specific to their program type on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating programs;
- Regularly reviews data quality reports at community planning level on data entry completion, consistency with program model, and timeliness as compared to the community data quality standards;
- Provides training and guidance on business practices to support CoC and HMIS policies (CoC-specific protocols, ethics, strategies for communication, etc.);
- Ensures the existence and use of HMIS Policies and Procedures;
- And ensures at least one homeless person or formerly homeless person participates in policymaking. Participation can include but is not limited to Advisory Council leadership, advisory committees, staff positions, and sub-committee positions.

### 3.1.2   Data Committee

The MCoC Data Committee (Data Committee) is comprised of Participating Agencies, and the Lead Agency. The Data Committee reviews data analysis, systems mapping, the PIT, and other data-related issues and topics within the MCoC. The Data Committee also oversees the quality of the data that is put into HMIS and is responsible for developing and implementing an ongoing data quality plan.

*Key CoC Data Committee responsibilities as detailed in the Maine HMIS Governance Model include;*

- Coordinate the resolution of data issues;
- Recommend community level data quality plans and standards;
- Recommends policy and procedures for Maine HMIS as it relates to the data, including software application, data elements to be collected, and intervals for data gathering;
- Consider the effectiveness, and what improvements can be made, to the intake process;
- Work with Participating Agencies to identify training needs to improve data quality;
- Review Participating Agency data quality reports for compliance with the data quality benchmarks;
- And provides regular data quality reports to the CoC Board on the quality of the MCoC's data.

### 3.2   Lead Agency

HMIS Lead means an entity designated by the CoC to operate the Continuum's HMIS on its behalf.

HUD requires that every CoC work together to implement a shared data system designed to provide an un-duplicated count of homeless individuals, information on the number of people who are homeless, related demographics, and their needs over time. The HMIS Lead works with the Participating Agencies to meet this goal. MaineHousing is the designated Lead Agency.

*To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:*

(a)Ensure the operation of and consistent participation by recipients of funds from the Emergency Solutions Grants Program and from the other programs authorized by Title IV of the McKinney-Vento Act. Duties include establishing the HMIS; conducting oversight of the HMIS; and taking corrective action, if needed, to ensure that the HMIS is compliant with the requirements of this part;

(b) Develop written HMIS policies and procedures in accordance with § 580.31 for all Participating Agencies;

(c) Execute a written HMIS Participation Agreement with each PARTICIPATING AGENCY, which includes the obligations and authority of the HMIS Lead and PARTICIPATING AGENCY, the requirements of the security plan with which the PARTICIPATING AGENCY must abide, the requirements of the privacy policy with which the PARTICIPATING AGENCY must abide, the sanctions for violating the HMIS Participation Agreement (e.g., imposing a financial penalty, requiring completion of standardized or specialized training, suspending or revoking user licenses, suspending or revoking system privileges, or pursuing criminal prosecution), and an agreement that the HMIS Lead and the PARTICIPATING AGENCY will process Protected Identifying Information consistent with the agreement. The HMIS Participation Agreement may address other activities to meet local needs;

(d)Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Continuum of Care's geographic area, as directed by the Continuum, and, if selected for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved activities;

(e) Monitor and enforce compliance by all Participating Agencies with the requirements of this part and report on compliance to the Continuum of Care and HUD;

(f)The HMIS Lead must submit a security plan (see § 580.35), a data quality plan (see § 580.37), and a privacy policy (see § 580.31(g)) to the Continuum of Care for approval within [the date that is 6 months after the effective date of the final rule to be inserted at final rule stage] and within 6 months after the date that any change is made to the local HMIS. The HMIS Lead must review and update the plans and policy at least annually. During this process, the HMIS Lead must seek and incorporate feedback from the Continuum of Care and Participating Agencies. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Continuum of Care.

*According to the Proposed HMIS Requirements (24 CFR Part 91) only the HMIS Lead may carry out the following activities:*

(a) Host and maintain HMIS software or data;

(b) Backup, recovery, and repair of the HMIS software or data;

(c) Upgrade, customize, and enhance the HMIS;

(d) Integrate and warehouse data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems;

(e) System administration;

(f) Report to providers, the Continuum, and HUD;

(g) Conduct training for recipients on the use of the system, including the reasonable cost of travel to the training; and

(h) Such additional activities as may be authorized by HUD in notice.

*Additionally noted in the Proposed HMIS rule;*

(a) An HMIS Lead must develop a privacy policy. At a minimum, the privacy policy must include data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault, and stalking; and such additional information and standards as may be established by HUD in notice.

(b) Every organization with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including enforcement of sanctions for noncompliance.

(c) An HMIS Lead or PARTICIPATING AGENCY that contracts with an HMIS vendor must, as part of its contract with an HMIS vendor, require the HMIS vendor and the software to comply with HMIS standards issued by HUD.

The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Continuum of Care.

*Key Lead Agency Responsibilities as detailed in the Maine HMIS Governance Model:*

- Ensures that activities related to HMIS growth and use are developed, reviewed regularly, and are in accordance with the CoC's goals.
- Identifies general milestones for project management, including training, expanded system functionality, etc.
- Ensures that the HMIS is able to manage the collection of each data element and corresponding response categories for the Universal Data Elements as outlined in the Current HMIS Data Standard.
- Ensures that the HMIS is able to manage the collection of each data variable and corresponding response categories for the Project-specific data elements as outlined in the Current HMIS Data Standard..
- Ensures the HMIS is able to generate a summary report of the number of unduplicated client records that have been entered into the HMIS.
- Ensures the HMIS is consistently able to produce a reliable required federal reports.
- Ensures the HMIS generates other client served, utilization summary, and demographic reports both at the system and program levels for purposes of understanding the nature and extent of homelessness in the CoC.
- Provides technical expertise commensurate with the general HMIS program oversight; provides timely support on high level technical matters; reviews and authorizes HMIS software changes in response to the changing requirements of participating Agencies; and, generally reviews and authorizes special issues brought to it by participating Agencies.
- Provides technical expertise commensurate with the requirements of the HMIS software and/or system; provides timely support on software technical matters; is responsible for implementation of authorized changes to the HMIS software and processes; and, generally implements resolutions to any special issues authorized by the HMIS Technical Support Entity within the software and/or overall system.

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- Maintains a regularly updated list of HMIS system service requests, activities, deliverables, and resolutions.
- Regularly reviews HMIS System service requests, activities, deliverables and resolutions. Provides authoritative support when necessary to expedite IT issue resolution.
- Maintains a current and accurate organization chart that clearly identifies all team members, roles and responsibilities, and general work activities/functions. Organization chart is available for review (see Appendix B: Organization Chart).
- Provides regular training on software usage, software and data security, and data entry techniques to participating Agencies. Develops, updates, and disseminates data entry tools and training materials, includes train the trainer. Monitors and ensures system and data security.
- Manages and maintains mechanisms for soliciting, collecting, and analyzing feedback from end users, program managers, agency executive directors, and homeless persons. Feedback includes impressions of operational milestones and progress, system functionality, and general HMIS operations. Examples of feedback include satisfaction surveys, questionnaires, and focus groups.
- Responsible for the day-to-day operation and maintains the HMIS System.
- Ensures that the HMIS is managed in accordance to CoC policies, procedures, and goals.
- Regularly monitors program and agency-level participation in HMIS
- Ensures the completion and documentation of Authorization for Disclosure of Health and/or Personal Information, as appropriate with the CoC's Authorization for Disclosure of Health and/or Personal Information Policies and Protocols.
- Ensures adherence by agency staff with the HMIS data and system security protocols as outlined by the CoC and the Current HMIS Data Standard.
- Develops and enforces community level data quality plan and standards.
- Ensures the collection of each data variable and corresponding response categories on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating projects.
- Ensures the collection of each data variable and corresponding response categories specific to their program type on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating programs.
- Regularly runs and disseminates data quality reports to participating programs that indicate levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.
- Provides technical assistance and training in response to data quality reports disseminated to participating programs that indicate levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality
- Regularly runs and disseminates data quality reports to the community planning entity that indicate cross program levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.
- Regularly reviews data quality reports at community planning level on data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.
- Provides regular training on client confidentiality and privacy requirements to intake staff, data entry staff and reporting staff at participating Agencies. Ensures all Agencies have sufficient privacy policies and protocols in place.

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- Provides regular training and guidance on program performance measurement.
- Provides training and regularly reviews the progress of the Community Planning Goals and Objectives.
- Provides training and guidance on business practices to support CoC and HMIS policies (CoC-specific protocols, ethics, strategies for communication, etc.).
- Maintains documentation of the number of participating Agencies (utilizing the HMIS system) is up-to-date. A comparative analysis of planned versus actual deployments at the project level is highly desired but not compulsory.
- Provides regular reports on HMIS participation rates to CoC Data Subcommittee. An analysis of agency-specific barriers with potential solutions is highly desired but not compulsory.
- Ensures the existence and use of HMIS Policies and Procedures.
- Ensures and maintains written agreements with participating Agencies that describes the protocols for participation in the HMIS.
- Ensures and maintains written agreements with participating Agencies who share client level data that describes the level of data element or program information sharing among the data sharing HMIS Agencies.
- Ensures and maintains a written agreement with each authorized user of the HMIS that defines participation protocols, including training criteria, consent protocols, system use, and privacy and security standards.
- Ensures that the CoC has a defined and documented client Acknowledgement protocol for use as a baseline practice among all participating HMIS users.
- Ensures that the CoC has a defined and documented HMIS data release protocol that governs release of all data from the HMIS.
- Ensures At least one homeless person or formerly homeless person participates in policymaking. Participation can include but is not limited to Advisory Council leadership, advisory committees, staff positions, and sub-committee positions.

## 3.3   PARTICIPATING AGENCY

Participating Agencies are responsible for ensuring that HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data and the maintenance privacy, security, and confidentiality protections are in place for their individual programs and projects. A Participating Agency will include both an Agency Admin and End Users.

*To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:*

(a)Purchase, lease, or license computer hardware and software;

(b)Purchase or lease equipment, including telephones, faxes, and furniture;

(c)Pay for technical support;

(d)Lease office space;

(e)Pay for electricity, gas, water, phone service, and high-speed data transmission costs necessary to operate and participate in the HMIS;

(f)Pay salaries for operating HMIS,

which includes:

     (i)Data entry;

     (ii)Monitor and review data quality;

     (iii)Data analysis;

     (iv)Report to the HMIS Lead;

     (v)Attend HUD-sponsored and HUD- approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Act;

     (vi)Conduct training for PARTICIPATING AGENCYs on the HMIS or comparable database;

     (vii)Travel to conduct intake and to attend training;

     (viii)Implement and comply with HMIS requirements; and

(g)Pay the participation fee to the HMIS Lead that is established by the Continuum of Care in the governance

(h)If the PARTICIPATING AGENCY is a victim services provider, as defined under 24 CFR 580.3, or a legal services provider, establish and operate a comparable database that complies with 24 CFR 580.25; and

(i)Such other activities as authorized by HUD in notice.

### *Key Participating Agency Responsibilities as detailed in the Maine HMIS Governance Model:*

- Ensures the completion and documentation of Authorization for Disclosure of Health and/or Personal Information, as appropriate with the CoC's Authorization for Disclosure of Health and/or Personal Information Policies and Protocols.
- Ensures adherence by agency staff with the HMIS data and system security protocols as outlined by the CoC and the Current HMIS Data Standard.
- Ensures the collection of each data variable and corresponding response categories on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating projects.
- Ensures the collection of each data variable and corresponding response categories specific to their program type on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating programs.
- Regularly runs and disseminates data quality reports to participating programs that indicate levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.
- Provides regular training on client confidentiality and privacy requirements to intake staff, data entry staff and reporting staff at participating Agencies.  Ensures all Agencies have sufficient privacy policies and protocols in place.

- Ensures and maintains a written agreement with each authorized user of the HMIS that defines participation protocols, including training criteria, consent protocols, system use, and privacy and security standards.
- Ensures that the CoC has a defined and documented client Acknowledgement protocol for use as a baseline practice among all participating HMIS users.
- Ensures that the CoC has a defined and documented HMIS data release protocol that governs release of all data from the HMIS.

## 4    The Maine HMIS Participation Policy

### 4.1    Participation Requirements
Participation in HMIS. The recipient must ensure that data on all persons served and all activities assisted under ESG are entered into the applicable HMIS for the geographic area in which those persons and activities are located, or a comparable database, as provided under 24 CFR part 580. The entry, storage, and use of this data are subject to the HMIS requirements at 24 CFR part 580.

### 4.1.1    Mandated Participation
All designated agencies that are funded to provide homeless services by MaineHousing, State of Maine Department of Health and Human Services (DHHS), Office of Child and Family Services (OFCS), Runaway and Homeless Youth (RHY), Projects for Assistance in Transition from Homelessness (PATH), Supportive Services for Veteran Families (SSVF), Veterans Affairs Supportive Housing (VASH) and/or HUD in the State of Maine, must meet the minimum Maine HMIS participation standards as defined by this Policy and Procedures Manual. The proposed  HUD Rule found at 24 CFR Parts 91, detailing HMIS Requirements states; "With respect to scope, this rule clarifies that all recipients of financial assistance under the Continuum of Care program, the Emergency Solutions Grant program, the Rural Housing Stability Assistance (RHS) program, as well as HUD programs previously funded under the McKinney-Vento Act (the Supportive Housing Program, the Shelter Plus Care program, and the Section 8 Single Room Occupancy Moderate Rehabilitation program) are required to use HMIS to collect client- level data on persons served." Or for *victims service providers* a comparable database is to be used.  A comparable database must have the ability to collect client-level data over time and generates unduplicated aggregate reports based on the data.

### 4.1.2    Voluntary Participation
While the MCoC cannot require non-funded providers to participate in the Maine HMIS, and the MCoC works closely with non-funded agencies to articulate the benefits of HMIS, and to strongly encourage their participation.  Full participation in Maine HMIS ensures a comprehensive and accurate understanding of homelessness in the State of Maine. Non-funded agencies may voluntarily agree to participate but will need to meet minimum participation standards.

### 4.2    Participating Agency Standards
Participating Agencies are responsible for ensuring that a minimum set of data elements, referred to as the HUD Universal Data Elements (UDEs) as defined by the most current *HUD HMIS Data Standards Manual*, are collected and/or verified from all clients at their initial program enrollment, or as soon as possible thereafter (with the exception of those serving domestic violence victims). Participating Agencies must report client-level detail in the "Required Response Categories" for the UDE's that are shown in the most current *HUD HMIS Data Standards Manual.*

| HUD Universal Data Elements | | |
|---|---|---|
| Name | Social Security Number | Date of Birth |
| Race | Ethnicity | Gender |
| Veteran Status | Disabling Condition | Project Start Date |
| Project End Date | Destination | Relationship to Head of Household |
| Client Location | Housing Move-In Date | Living Situation |

A separate set of Program-Specific Data Elements for client level data are required for all programs funded by State or Federal programs, including but not limited to SSVF, VASH, OFCS, DHHS, PATH, RHY, and ESHAP. These elements are defined by the most current HUD *HMIS Data Standards Manual* and are collected from all clients that are served by applicable HUD-funded programs.

| HUD APR Program-Specific Data Elements | |
|---|---|
| Income and Sources | Substance Abuse |
| Non-Cash Benefits | Domestic Violence |
| Physical Disability | Services Received |
| Developmental Disability | Destination |
| HIV / AIDS | Reason for leaving |
| Mental Health | Substance Abuse |

These standards are already incorporated into the Maine HMIS, and can be accessed from the Maine HMIS website at: http://mainethe HMIS.org/. Data entry must be completed within a specific timeframe, depending on the type of program (see the attached Maine Data Quality Plan and Best Practices Guide).  The Maine HMIS uses all submitted data for analytic and administrative purposes, including the preparation of all Federal and State required reports.

### 4.2.1   Authorized Agency Users/ End Users
- Authorized Agency Users, also referred to as End Users, must enter client-level data directly into the HMIS database. End Users have rights to access data for clients served by their Agency and use the HMIS functionality based on their user level privileges. The Agency's data is stored in the HMIS central database server, which is protected by several levels of security to prevent access from unauthorized users.
- An End User has an active license to HMIS and uses ServicePoint as their primary tool for client intake, and reporting.  An End User is expected to do the following;
- Adhere to all of the policy and procedures outlined in the Maine HMIS Policies & Procedures;
- At intake, gather the most complete and accurate information about each client and the services they need according to the workflow provided at HMIS training;
- **Enter quality client data into HMIS in a timely and accurate manner and using the appropriate required work flow**;

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- Adhere to the data requirements set by the HMIS staff and the HMIS Participating Agency;
- After HMIS training, pass the certification test with a score of 80% or better.
- Meet and follow the expectations of the Agency Admins.
- An End User has an active license to HMIS and uses ServicePoint as their primary tool for client intake, and reporting. An End User is expected to do the following;
- Regularly reviews data quality reports at community planning level on data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.
- At intake, gather the most complete and accurate information about each client and the services they need according to the workflow provided at HMIS training;
- Enter quality client data into HMIS in a timely and accurate manner and using the appropriate required work flow;
- After HMIS training, pass the certification test with a score of 80% or better;
- Meet and follow the expectations of the Agency Admins;
- And adhere to all of the policy and procedures outlined in the Maine HMIS Policies & Procedures.

### 4.2.2    Agency Administrator

Each Agency must designate at least one Agency Administrator (Agency Admin) who is the point person and specialist regarding the Maine HMIS for their agency. Some of the key roles of the Agency Admin are;

- Running HUD Universal Data Elements, Data Incongruities Reports, and other data quality reports in ART at least monthly and upon request of the Maine HMIS staff and/or the CoCs to check client data.
- Completing the Agency Administrator training.
- Informing the Maine HMIS Staff of all program changes at least 5 business days prior to the change.
- Communicate and authorize personnel and security changes for End Users to the Maine HMIS Staff within 24 hours of a change; inactivating end users account when an End User leaves the agency
- Ensure that end-users are using the correct HMIS-related forms and are following the most current Maine HMIS procedures and work flow.
- Correct any data quality issues as soon as possible and notify the HMIS Staff of findings and timelines for correction.
- Provide technical support by troubleshooting data and escalating unresolved issues to the Maine HMIS Staff.
- Review and update HIC information in the HMIS annually
- Attend the Maine HMIS-required meetings and conference calls.
- Adhere to all of the policy and procedures outlined in the Maine HMIS Policies & Procedures

Each Agency must designate at least one Agency Administrator (Agency Admin) who is the point person and specialist regarding the Maine HMIS. The Agency Administrator is responsible for:

- Completing the Agency Administrator training.
- Informing the Maine HMIS Staff of all program changes at least 5 business days prior to the change.

- Running HUD Universal Data Elements, Data Incongruities Reports, and other data quality reports in ART at least monthly and upon request of the Maine HMIS staff and/or the CoCs to check client data.
- Correct any data quality issues as soon as possible and notify the HMIS Staff of findings and timelines for correction.
- Provide technical support by troubleshooting data and escalating unresolved issues to the Maine HMIS Staff.
- Review and update HIC information in the HMIS annually.
- Communicate and authorize personnel and security changes for End Users to the Maine HMIS Staff within 24 hours of a change. Inactivating end users account when an End User leaves the agency;
- Ensure that end-users are using the correct HMIS-related forms and are following the most current Maine HMIS procedures and work flow.
- Attend the Maine HMIS-required meetings and conference calls.
- Resetting End Users accounts when they are locked out.

# 5   Hardware, Connectivity and Computer Security Requirements

*To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the* ==HMIS Lead== *shall:*

# 6   Technical Standards

§ 580.33   HMIS technical standards.

(a)In general. HMIS Leads and HMIS vendors are jointly responsible for ensuring compliance with the technical standards applicable to HMIS, as provided in this document and any supplemental notices, and for addressing any identified system or operating deficiencies promptly. Grant funds must be used only for software that meets the requirements of this part.

(b)Required functionality. The HMIS must meet all required functionality established by HUD in notice.

(c)Un-duplication requirements. An HMIS must be capable of un-duplicating client records as established by HUD in notice.

(d)Data collection requirements.

> (i) Collection of all data elements. An HMIS must contain fields for collection of all data elements established by HUD in notice. For fields that contain response categories, the response categories in the HMIS must either directly match or map to the response categories defined by HUD.

(ii) Maintaining historical data. An HMIS must be able to record data from a theoretically limitless number of service transactions and historical observations for data analysis over time and assessment of client outcomes, while following Federal, state, territorial, or local data retention laws and ordinances.

(e)Reporting requirements.

(i) Standard HUD reports. An HMIS must be able to generate the report outputs specified by HUD. The reporting feature must be able to represent dates in the past for all historical and transactional data elements.

(ii)Data quality reports. An HMIS must be capable of producing reports that enable the PARTICIPATING AGENCYs and the HMIS Lead to assess compliance with local data quality benchmarks and any HUD-established data quality benchmarks.

(iii)Audit reports. An HMIS must be capable of generating audit reports to allow the HMIS Lead to review the audit logs on demand, including minimum data requirements established by HUD in notice.

## 6.1    Workstation Specifications

### 6.1.1    Monitor
Screen Display - 1024 x 768 (XGA)

### 6.1.2    Processor
A Dual-Core processor is recommended. Avoid machines with single core processors, which are usually much older computers.

### 6.1.3    Browser
ServicePoint is designed to be compatible with the newest versions of Google Chrome, Mozilla Firefox, and Apple Safari

*Browser Performance:* In the context of ServicePoint 5, there are three factors that outweigh all others: data transfer efficiency, memory management, and machine speed.

### 6.1.4    Memory Management
Some browsers handle memory differently than others. The best practice for determining the best browser is to see if you experience any of the following issues.

*Effects of poor memory management*:

Your overall system performance may degrade.

Your browser may suddenly seem to completely stop working. Blank pages may appear or certain page components won't work.

Your browser may run more and more slowly.

What to do:

If you suspect that you may have poor browser memory management, try updating your browser to a more recent version before switching to a different brand of browser. More than likely, any major issue will have been fixed with a more current release. If you still have issues, try switching to one of the other 3 major browsers. If you need help updating your browser, contact your IT Department.

### 6.1.5    Machine Speed
Avoid machines with single core processors, which are usually much older computers. If your computer is a single-core machine operating at less than 2 GHZ, and you are not content with its performance:

Switch to one of the fastest browsers. Chrome is recommended, Firefox is a good alternate; Internet Explorer versions 8, 9 and 10 are acceptable (see below for information regarding Internet Explorer version 11).

Run no unnecessary programs while using ServicePoint.

Monitor your CPU usage in Task Manager. If it is frequently    at 100%, you need a more capable machine.

Think about getting more RAM. But before you buy enough RAM to max out your computer, consider replacing your old computer with a new or used dual-core machine. Even an old dual core tends to outperform a fully- upgraded, single-core in ServicePoint 5. Buying a used computer may actually cost less than buying a gigabyte or two of obsolete RAM for an older machine.

### 6.1.6    Art Users
ART only supports Java 7 release 7 (32 bit). Any higher versions of Java are not currently supported. We do not recommend the 64 bit version of Java because Chrome is a 32 bit only browser and the 64 bit version of Java does not function in Chrome.

### 6.1.7    Internet Connectivity
Participating Program must have Internet connectivity for each workstation accessing the HMIS. To optimize performance, all agencies are encouraged to secure a high speed Internet connection with a cable modem, DSL, FiOS, or T1 line.

### 6.1.8    Security Hardware/Software
All workstations accessing the HMIS need to be protected by a Firewall. If the workstations are part of an Agency computer network, the Firewall may be installed at a point between the network and the Internet or other systems rather than at each workstation. Each workstation also needs to have anti-virus and anti-spyware programs in use and properly maintained with automatic installation of all critical software updates.

Good examples of anti-virus software include McAfee and Symantec (Norton) Security systems, among others.

### 6.1.9    Agency Workstation Access Control
Access to the HMIS will be allowed only from computers specifically identified by the Participating Agency's Executive Director or authorized designee and THE HMIS Agency Administrator. Laptop computers will require an additional security statement indicating that they will not be used for unauthorized purposes from unauthorized locations. Access to these workstations will be controlled through both physical security measures and a password. Each Agency's THE HMIS Agency Administrator will determine the physical access controls appropriate for their organizational setting based on THE HMIS security policies, standards and guidelines.

Each workstation, including laptops used off-site, should have appropriate and current firewall, and virus protection as specified above, see *Section 5 (c) Security Hardware/Software*. Devices must only access secured, password- protected wi-fi with non-public access.

### 6.1.9.1 Access to Maine HMIS ServicePoint from an authorized Home Office

MaineHousing and other participants in the Maine HMIS who have written and enforced work-at-home policies may authorize home office locations as authorized agency location for Maine HMIS ServicePoint use given the home office location is structured to assure that viewing of client information by unauthorized persons does not happen. A signed copy of work at home authorization and the related work at home policy should be on file at the MaineHousing HMIS office for anyone who works with ServicePoint from a home office setting.

# 7 The Maine HMIS Training Requirements

## 7.1 Eligible Users

Each Participating Agency shall authorize use of the HMIS only to users who need access to the system for data entry, editing of client records, viewing of client records, report writing, administration or other **essential** activity associated with carrying out Participant Agency responsibilities.

### 7.1.1 Setting up a New HMIS End User

It is the responsibility of the Agency Administrator to contact the HMIS Staff when a new user starts and training is required.

The agency will email A "New User Agreement" to the HMIS HelpDesk at the HMIShelp@mainehousing.org, requesting access to THE HMIS/ServicesPoint. The HelpDesk will acknowledge receiving the "New User Agreement" that can be found here https://mainethe HMIS.org/new_user_training/.

### 7.1.1.1 New End User Training Requirements

All Agency Admins and End Users will be trained, either in person, or using the online training center. After training, users will be required to pass the Maine HMIS certification test. When the Maine HMIS verify the user has passed the test (with a grade of 80% or above), they will be given a password so they can access ServicePoint.

The HMIS Lead Agency shall authorize use of the HMIS only to users who need access to the system for technical administration of the system, report writing, data analysis and report generation, back-up administration or other essential activity associated with carrying out central server responsibilities.

The HMIS HelpDesk will assist in creating a Canvas account. Canvas is the platform HMIS will be using for online new user and program specific trainings found at https://canvas.instructure.com/.  Agencies should be aware that Canvas emails may be filtered to spam or junk folders. Canvas will notify the HelpDesk and new user once training modules have been completed.

Once new user and program specific training has been completed the HelpDesk will create the new user's account in the HMIS and contact the new user to set up a time to review training that has been completed along with account credentials.

Each end user of the HMIS system must complete at least one session of training and pass the certification test with a grade of 80% above before being given THE HMIS login credentials.

## 7.2    Agency Administrator Training

After completing End-User training, each new Agency Administrator must complete an additional Admin training session. This session will include how to configure and manage an Agency's programs and users in the HMIS. Agency Administrators will participate in subsequent training sessions as designated by the Maine THE HMIS Lead Agency, such as running the CoC APR, AHAR, HIC, CAPER and/or other project reports.

## 7.3    Reports Training

Reports training for Agency Administrators and other interested users will be made available as needed. This training will include how to use existing canned reports in ServicePoint and may include opportunities for training on the Advanced Reporting Tool (ART).

Maine THE HMIS staff strongly encourages Participating Agencies to run their own data quality reports and APR report monthly so that Participating Agencies can monitor their own data quality and become more effective in serving clients across the Continuum.

### 7.3.1    Agency Admins & End User Requirements

Prior to being trained and granted a username and password, users must sign the HMIS User Policy Agreement.  This agreement acknowledges receipt of a copy of as well as a pledge to comply with the Agency's Privacy Notice.

**Agency Admins and End Users must be aware of the sensitivity of client-level data and must take appropriate measures to prevent its unauthorized disclosure. Administrators and End Users are responsible for protecting institutional information to which they have access and for reporting security violations.**

Agency Admins and End Users must comply with all policies and standards described in the following documents:

- The Agency Participation Agreement;
- User Policy and Agreement;
- The Maine HMIS Governance Model;
- The Maine HMIS Data Quality Plan and Best Practices Guide;
- HUD HMIS Data Standards Manual
- and the Data Sharing Agreements;

**Users are accountable for their actions and for any actions undertaken with their username and password.**

Agency Admins must ensure that users have received adequate training prior to being given access to the HMIS database. If any user leaves the Agency or no longer needs access to the HMIS, the Agency Administrator is responsible for *immediately notifying the HMIS Team* at [HMIShelp@mainehousing.org](mailto:HMIShelp@mainehousing.org) so that the user's access can be terminated.

Volunteers have the same user requirements as paid staff. They must have an individual user account, go through the same training, and have the same confidentiality and privacy documents signed and on file with the Participating Agency they are serving.

The Executive Director or authorized designee is responsible for ensuring that the Agency Admin and End Users understands and comply with all applicable THE HMIS policies and procedures.

### 7.3.2   User Licenses

User licenses are provided to Participant Agencies as determined by the Lead Agency.

## 8   THE HMIS Agency Implementation

### 8.1.1   Setting up a New HMIS Agency

If your agency would like to participate in the Maine HMIS, the Agency Participation Agreement is the first form you will need to complete.  The agreement covers the areas of:  terms of use, training and technical assistance, confidentiality, security, and access to data.  This agreement should be signed by an official who is authorized to enter into contractual agreements on your agency's behalf.

After your agency has agreed to participate in Maine HMIS you will need to complete the Agency Information Form. This form tells us about the types of housing and services that your agency provides.  This will assist the Maine HMIS administrators when configuring your agency in HMIS.

Your agency will also need to complete a Maine Annual Homeless Housing Inventory Form. It will be pre-filled with the information currently on record regarding projects who are already on the Housing Inventory.

Once your agency is set up in HMIS All users must read, acknowledge and sign the HMIS/ServicePoint User Policy, Responsibilities Statement, and Code of Ethics before they are allowed access to the HMIS system. This form was updated on 11/23/2009 to clarify the signature lines.  The form was updated again on 7/15/2010 to clarify which program type(s) the user needs to be trained for data entry and reporting.

It is recommended that agencies retain a copy of this Maine HMIS Policies and Procedures Manual for reference.

Agencies that share client level data between or among multiple agencies must fill out and submit a Maine HMIS Coordinated Services Agreement.

Agencies must additionally complete a Qualified Organization Business Associate Agreement (HIPPA) to share information entered into Maine Statewide Homeless Management Information System (Maine HMIS) for the general purpose of managing the System. MaineHousing provides training, administration, coordination, and report generation to agencies, programs and Continuum of Care participating in Maine Statewide Homeless Management Information System. Acknowledges that in transmitting, receiving, storing, processing or otherwise dealing with any consumer protected information, they are fully bound by state and federal regulations governing confidentiality of patient records, including the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 ('HIPAA', 45 CFR, Parts 160 & 164), and cannot use or disclose the information except as permitted or required by this agreement or by law.

The Agency Admin must verify that appropriate and sufficient training has been successfully completed

## 8.2    Enforcement Mechanisms

The Lead Agency will investigate all potential violations of any security protocols. Any Agency Admin or End User found to be in violation of security protocols will be sanctioned.

Sanctions may include, but are not limited to:

- A formal letter of reprimand to the MaineHousing Security Compliance Auditor, CoC Board, and the Agency Executive Director
- Suspension or Revocation of Agency Access if serious or repeated violation(s) of Maine HMIS Policies and Procedures occur by Agency Admins and/or End Users.

Prior to setting up a new Participant Agency within the Maine HMIS database, the Maine HMIS Lead Agency will:

Verify that the required documentation has been correctly executed and submitted or viewed on site, including:

- Agency Participation Agreement
- Admin Agency/Program Configuration/ HIC Worksheet
- Maine HMIS Policies and Procedures Manual
- Maine HMIS Governance Model document

Request and receive approval from the HMIS Lead Agency to set up a new Agency.

Work with the Agency Administrator to input applicable Agency and program information.

Work with the HMIS Lead to migrate legacy data, if applicable, and within the scope of normal HMIS functions. Data needing additional HMIS or third party vendor intervention will be addressed on a case-by-case basis.

Follow the HMIS naming conventions (Agency name: Project).

When completing your COC Application budget for a new project, keep in mind that funds may be needed to cover increased HMIS costs to cover HMIS-related tasks and staffing for stability of HMIS operations.

## 8.3    Agency Information Security Protocol Requirements

At a minimum, Participating Agencies must develop rules, protocols or procedures to address the following:

- Policies in the event of a HIPPA breach*
- Internal Agency procedures for complying with the HMIS confidentially requirements and provisions of other HMIS client and Agency agreements
- Posting a sign in the areas of client intake that explains generally the reasons
- for collecting personal information
- Appropriate assignment of user accounts
- Preventing user account sharing
- Protection of unattended workstations
- Protection of physical access to workstations where employees are accessing the HMIS

- Safe storage and protected access to hardcopy and digitally generated client records and reports with identifiable client information
- Proper cleansing of equipment prior to transfer or disposal (i.e. disk shredding)
- Procedures for regularly auditing compliance with the Participating Agency's information security protocol

**NOTE: If an Agency is not in compliance with this policy, they risk losing funding.**

## 8.4    User Access Levels

All the HMIS users must be assigned a designated user access level that controls the level and type of access the user will have within the system. Each user will only have access to client-level data that is collected by their own Agency unless they participate in Data Sharing groups.

## 8.5    Security Standards

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:

580.35   HMIS security standards.

(a)In general. Security standards, as provided in this section, are directed to ensure the confidentiality, integrity, and availability of all HMIS information; protect against any reasonably anticipated threats or hazards to security; and ensure compliance by end users. Written policies and procedures must comply with all applicable Federal law and regulations, and applicable state or local governmental requirements.

(b)System applicability. All HMIS Leads, PARTICIPATING AGENCYs, and HMIS vendors must follow the security standards established by HUD in notice.

(c)Security management.

(i) Security plan. All HMIS Leads must develop a HMIS security plan, which meets the minimum requirements for a security plan as established by HUD in notice, and which must be approved by the Continuum of Care.

(ii) Timeline for implementation. The HMIS Lead must submit the security plan to the Continuum of Care for approval within 6 months of [effective date of final rule to be inserted at final rule stage]. The HMIS Lead and PARTICIPATING AGENCYs must implement all administrative, physical, and technical safeguards within 6 months of the initial approval of the security plan. If one or more of these standards cannot be implemented, the HMIS Lead must justify the implementation delay and produce a plan of action for mitigating the shortfall, and develop milestones to eliminate the shortfall over time.

(d)Administrative safeguards. The administrative actions, policies, and procedures required to manage the selection, development, implementation, and maintenance of security measures to protect HMIS information must, at a minimum, meet the following:

(e)Security officer. Each HMIS Lead and each PARTICIPATING AGENCY must designate an HMIS security officer to be responsible for ensuring compliance with applicable security standards. The HMIS Lead must designate one staff member as the HMIS security officer.

(f)Workforce security. The HMIS Lead must ensure that each PARTICIPATING AGENCY conduct criminal background checks on the HMIS security officer and on all administrative users. Unless otherwise required by HUD, background checks may be conducted only once for administrative users.

(g)Security awareness training and follow-up. The HMIS Lead must ensure that all users receive security training prior to being given access to the HMIS, and that the training curriculum reflects the policies of the Continuum of Care and the requirements of this part. HMIS security training is required at least annually.

(h)Reporting security incidents. Each HMIS Lead must implement a policy and chain of communication for reporting and responding to security incidents, including a HUD-determined predefined threshold when reporting is mandatory, as established by HUD in notice.

(i)Disaster recovery plan. The HMIS Lead must develop a disaster recovery plan, which must include at a minimum, protocols for communication with staff, the Continuum of Care, and PARTICIPATING AGENCYs and other requirements established by HUD in notice.

(j)Annual security review. Each HMIS Lead must complete an annual security review to ensure the implementation of the security requirements for itself and PARTICIPATING AGENCYs. This security review must include completion of a security checklist ensuring that each of the security standards is implemented in accordance with the HMIS security plan.

(k)Contracts and other arrangements. The HMIS Lead must retain copies of all contracts and agreements executed as part of the administration and management of the HMIS or required to comply with the requirements of this part.

(l)Physical safeguards. The HMIS Lead must implement physical measures, policies, and procedures to protect the HMIS.

(m)Technical safeguards. The HMIS Lead must implement security standards establishing the technology that protects and controls access to protected electronic HMIS information, and outline the policy and procedures for its use.

## 8.6   Data Quality Standards
§ 580.37 Data quality standards and management.

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:

(a)In general. The data quality standards ensure the completeness, accuracy, and consistency of the data in the HMIS. The Continuum of Care is responsible for the quality of the data produced.

(b)Definitions. For the purpose of this section, the term:

(i)HMIS participating bed means a bed on which required information is collected in an HMIS and is disclosed at least once annually to the HMIS Lead in accordance with the requirements of this part.

(ii)Lodging project means a project that provides overnight accommodations.

(iii)Nonlodging project means a project that does not provide overnight accommodations.

(c)Data quality benchmarks. HMIS Leads must set data quality benchmarks for PARTICIPATING AGENCYs. Benchmarks must include separate benchmarks for lodging and nonlodging projects. HMIS Leads must establish data quality benchmarks, including minimum bed coverage rates and service-volume coverage rates, for the Continuum(s) of Care. HMIS Leads may establish different benchmarks for different types of projects (e.g., emergency shelter projects, permanent housing projects) based on population.

> (i)For the purpose of data quality, the bed coverage rate measures the level of lodging project providers' participation in a Continuum of Care's HMIS.

> (ii)The bed coverage rate is calculated by dividing the number of HMIS participating by the total number of year-round beds in the geographic area covered by the Continuum of Care.

> (iii) Bed coverage rates must be calculated separately for emergency shelter, safe haven, transitional housing, and permanent housing.

> (iv)Bed coverage rates must be calculated for each comparable database.

(d)For the purpose of data quality, the service-volume coverage rate measures the level of nonlodging project participation in a Continuum of Care's HMIS.

> (i)Service-volume coverage is calculated for each HUD-defined category of dedicated homeless nonlodging projects, such as street outreach projects, based on population.

> (ii)The service-volume coverage rate is equal to the number of persons served annually by the projects that participate in the HMIS divided by the number of persons served annually by all Continuum of Care projects within the HUD-defined category.

> (iii)Service-volume rates must be calculated for each comparable database.

(e)Data quality management. (1) Data quality plan. All HMIS Leads must develop and implement a data quality plan, as established by HUD in notice.

(f)The HMIS must be capable of producing reports required by HUD to assist HMIS Leads in monitoring data quality.

## 8.7   Maintaining and Archiving

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:

580.41   Maintaining and archiving data.

(a)Maintaining data. Applicable program regulations establish the length of time that records must be maintained for inspection and monitoring to determine that the recipient has met the requirements of the program regulations.

(b)Archiving data. Archiving data means the removal of data from an active transactional database for storage in another database for historical, analytical, and reporting purposes. The HMIS Lead must follow archiving data standards established by HUD in notice, as well as any applicable Federal, state, territorial, local, or data retention laws or ordinances.

# 9    HMIS Client Data Policies and Procedures

## 9.1    Client Notification Policies and Procedures

The Maine HMIS has prepared standard documents for the HMIS release of information Maine HMIS Authorization for Disclosure of Health/ and or Personal Information.  All written consent forms must be stored in a client's file for record keeping and auditing purposes. Forms are located on the HMIS website http://maineHMIS.org/

By participating in the Maine HMIS, agencies and users agree to high standards of confidentiality and to seek explicit authority and permission from clients for release of any identifiable client information.

The client has the right to have access to their own data.

A Release of Information form must be signed by a client (even to low-barrier shelters) before any protected personal information can be shared.

Written interagency data sharing agreements (if any) between particular agencies (i.e., Memoranda of Agreement) will have to be in place and on file at MaineHousing prior to sharing of information within Maine HMIS ServicePoint across agencies.

All agencies participating in HMIS will be required to follow all current data security practices detailed in this document, and adhere to ethical data use standards, regardless of the location where agency users connect to the HMIS.

The client will have access to view, or keep a printed copy of, his or her own records contained in the HMIS.

The participating agencies and MaineHousing reserve the right, granted under federal and state statutes, to charge a fee to cover reasonable costs for the retrieval and printing of such client information.

A privacy notice shall be prominently displayed in the program offices where intake occurs. The content of this privacy notice shall be in accordance with the HMIS Privacy Standards in: Federal Register / Vol. 69, No. 146 / Friday, July 30, 2004 and any other applicable standards

## 9.2    Accountability for the Maine HMIS Policy

Participating Agencies must establish a regular process of training users on the Maine HMIS policies and procedures outlined in this manual, regularly auditing that the policy is being followed by Agency staff (including employees, volunteers, affiliates, contractors and associates), and receiving and reviewing complaints about potential violations of the policy.

## 9.3    HMIS Data Quality Policies and Procedures

The Maine HMIS has prepared the following data quality document that outlines the data quality policies and procedures, Maine Data Quality Plan and Best Practices Guide this document is available at www.mainehmis.org.

# 10 THE HMIS Data Access Control Policies

## 10.1 User Accounts
Agency Administrators are responsible for managing user accounts for their Agency. They must follow the procedures documented in *Section 6,* for user account set-up including verification of eligibility, the appropriate training, and the establishment of appropriate user type. The assigned user type will determine each user's individual access level to data, and Agency Administrators must regularly review user access privileges.

The Agency Administrator is responsible for inactivating users in the system. They should inactivate the user immediately upon that user's departure from any position with access to the HMIS. Agency Administrators are required to notify the HMIS team immediately upon inactivation.

## 10.2 User Passwords
Each user will be assigned a unique identification code (User ID), preferably the first initial and last name of the user.

A temporary password will be automatically generated by the system when a new user is created. The Maine HMIS Lead Agency will communicate the system-generated password to the user. The user will be required to establish a new password upon their initial login. This password will need to be changed every 45 days. A password cannot be used again until another password has expired. Passwords should be between 8 and 50 characters long, contain at least two numbers, and should not be easily guessed or found in a dictionary. The password format is alphanumeric and is case-sensitive. Users are prohibited from sharing passwords, even with supervisors.

## 10.3 Password Reset
Except when prompted by ServicePoint to change an expired password, users cannot reset their own password. The Agency Administrator and the Maine HMIS Lead Agency have the ability to temporarily reset a password. If an Agency Administrator needs to have his/her password set, they will need to email the HMIS Lead at HMIShelp@mainehousing.org.

## 10.4 System Inactivity
Users must log off from the HMIS application and their workstation if they leave their workstation. Also, HUD requires password-protected screen-savers on each workstation. If the user is logged onto a workstation and the period of inactivity on that workstation exceeds 30 minutes, the user will be logged off the system automatically.

## 10.5 Unsuccessful Login
If a user unsuccessfully attempts to log in three times, the User ID will be "locked out", their access permission will be revoked. They will be unable to regain access until their User ID is reactivated by the Agency Administrator or Maine HMIS Lead Agency. They will need to email the HMIS Lead at HMIShelp@mainehousing.org.

# 11 THE HMIS Data Ownership Policies

The client has the right to view and have corrections made on their own data. In the event that the relationship between the Maine HMIS and a Participating Agency is terminated, Participating Agency access is terminated. If another program is assuming the program administration then the data migrates to the new program (fees may apply).

## 11.1 The HMIS Data Use and Disclosure Policies and Procedures
Each of the HMIS Participating Programs must comply with uses and disclosure standards, as outlined in the *HUD HMIS Data Standards Manual*. The most current HUD data standards document can be found on the Maine HMIS website http://mainethe HMIS.org/

## 11.2 The HMIS Data Release Policies and Procedures

### 11.2.1 Data Release Criteria
The HMIS client data will be released only in aggregate, for any purpose beyond those specified in *Section 12 (c) THE HMIS Data Use and Disclosure Policies and Procedures*, according to the criteria specified below.

### 11.2.2 Aggregate Data Release Criteria
All released data must be anonymous, either by removal of all identifiers and/or all information that could be used to infer an individual or household identity.

# 12 THE HMIS Technical Support Policies and Procedures

## 12.1 The HMIS Application Support
As unanticipated technical support questions on the use of the HMIS application arise, users will follow these procedures to resolve those questions:

During the normal Maine HMIS business hours: (8:00-4:00)

Review the on-line help in ServicePoint and/or training materials on the HMIS website at http://maineHMIS.org/ or the Maine HMIS Learning Academy

Direct the technical support question to the Agency Administrator.

If the question is still unresolved, the Agency Administrator/user can direct the question to the Maine HMIS team  by sending an email to HMIShelp@mainehousing.org

After the normal Maine HMIS business hours:

Review the on-line help in ServicePoint and/or training materials on the HMIS website at http://maineHMIS.org/ or the Maine HMIS Learning Academy.

If the question can wait to be addressed during the following business day, wait and follow the normal business hours procedure outlined above.

If the question cannot wait, direct the technical support question to the Agency Administrator, if available.

## 12.2 THE HMIS System Availability Policies

The Maine HMIS ServicePoint data entry web site will be available to participating agencies 24 hours a day, 7 days a week. In the case there is a planned outage or issues impacting availability users will be notified through http://maineHMIS.org/ in advance if at all possible.

Every Wednesday from 10:00PM-11:00PM Eastern (EST) time, ServicePoint is unavailable because Mediware is performing necessary backup and maintenance of the HMIS database when as few people as possible need access to the system. However, when the Maine HMIS receives notice of a planned interruption of service for other reasons or for an abnormal amount of time, the HMIS Lead Agency will notify Agency Administrators and End-Users via email. If there is an unplanned interruption to service, the Maine THE HMIS System Administrator will communicate with Mediware, and Agency Administrators will be notified of any information regarding the interruption as it is made available.

If you have any questions about policies and procedures, contact the HMIS Lead, your CoC Data group, or the HMIS Advisory Council.

## 12.3 Standards for a Comparable Database

(a)Standards for a comparable database.

> (i) The comparable database must meet the standards of this part and comply with all HMIS data information, security, and processing standards, as established by HUD in notice.

> (ii) The comparable database must meet the standards for security, data quality, and privacy of the HMIS within the Continuum of Care. The comparable database may use more stringent standards than the Continuum of Care's HMIS.

(b)Victim service providers and legal service providers may suppress aggregate data on specific client characteristics if the characteristics meet the requirements of this part and any conditions as may be established by HUD in notice.

# 13  Appendix A: Maine HMIS Glossary

| MAINE HMIS GLOSSARY | |
|---|---|
| **Term** | **Definition** |
| Accuracy | The degree to which HMIS data correctly reflects the client situation or episode as self-reported by the client. |
| Advanced Reporting Tool (ART) | A comprehensive reporting option in the HMIS that allows HMIS Users to create reports using a custom report building interface. |
| Annual Homeless Assessment Report (AHAR) | A report to the U.S. Congress on the extent and nature of homelessness in America. The report is prepared by the Department of Housing and Urban Development (HUD) and provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The report is based primarily on Homeless Management Information Systems (HMIS) data about persons who experience homelessness during a 12-month period. |
| Annual Performance Report (APR) | A report that tracks program progress and accomplishments in HUD`s competitive homeless assistance programs. The APR provides the grantee and HUD with information necessary to assess each grantee`s performance. |
| ART Report | A report created with the Advanced Reporting Tool in the HMIS. |
| Authorization for Disclosure of Health and/or Personal Information | This Acknowledgement embodies the element of informed Acknowledgement in a written form. A client completes and signs a document acknowledging that they have an understanding of the options and risks of participating or sharing data in an HMIS system. The signed document is then kept on file at the agency. |
| Bed Utilization | An indicator of whether shelter beds are occupied on a particular night or over a period of time. |
| Central Intake Coordinated Assessment | A centralized or coordinated process designed to make program participant intake, assessment, and provision of referrals more efficient. |
| Completeness | The level at which an HMIS field has been answered in whole or in its entirety. |
| Consolidated Annual Performance and | Analysis of need within a community and identification of HUD-sponsored grants – Community Development Block Grant (CDBG), |

| | |
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| Evaluation Report (CAPER) | The HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons with AIDS Grant (HOPWA) -- which will best meet those needs. |
| Chronically Homeless | HUD defines a chronically homeless person as<br><br>(1) A "homeless individual with a disability," as defined in the Act, who:<br><br>(i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and<br><br>(ii) Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months. Occasions separated by a break of at least seven nights. Stays in institution of fewer than 90 days do not constitute a break<br><br>(2) An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or<br><br>(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless. |
| CoC Program Interim Rule (24 CFR Part 578) | Part of the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) that focuses on regulatory implementation of the Continuum of Care program, including the Continuum of Care planning process. |
| Comparable Database | A comparable database means a database used by a victim service provider or a legal service provider that collects client-level data over time and generates unduplicated aggregate reports based on the data, in accordance with the requirements of this part. Information entered into a comparable database must not be entered directly into or provided to an HMIS. |
| Continuum of Care (CoC) | A group organized to assist individuals and families experiencing homelessness by helping homeless individuals and families move into transitional and permanent housing. |

| | Composed of representatives from organizations including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve veterans, and homeless and formerly homeless persons organized to carry out the responsibilities of a Continuum of Care established under 24 CFR part 578 |
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| CoC Board | The Executive Board for the local CoC |
| Coverage | A term commonly used by CoCs or homeless providers that refers to the number of beds represented in an HMIS divided by the total number of beds available. |
| Data Committee | A committee of the MCoC that reviews data analysis, systems mapping, the Point in Time Count, and other data-related issues and topics within the Continuum of Care. |
| Data Quality | The accuracy and completeness of all information collected and reported to the HMIS. |
| Data Recipient | A person who obtains personally identifying information from an HMIS Lead or from a CHO for research or other purposes not directly related to the operation of the HMIS, Continuum of Care, HMIS Lead, or CHO. |
| Data Standards | See the current HUD HMIS Data Standard. |
| Disabling Condition | A condition in reference to chronic homelessness is defined by HUD as a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions. A disabling condition limits an individual`s ability to work or perform one or more activities of daily living. |
| Emergency Shelter | Any facility whose primary purpose is to provide temporary shelter for the homeless in general, or for specific populations of the homeless. |
| Emergency Solutions Grant (ESG) | Federal grants to support homelessness prevention, emergency shelter, and related services. |
| Family Youth Services Bureau (FYSB) | A federal program under HHS that supports organizations and communities that work to put an end to youth homelessness, adolescent pregnancy and domestic violence. |

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| HEARTH Act: Homeless Emergency Assistance and Rapid Transition to Housing Act | The HEARTH Act consolidates and amends three of the homeless assistance programs authorized by title IV of the McKinney-Vento Act (42 U.S.C. 11371 et seq) into a single grant program. Also, the HEARTH Act revised the Emergency Shelter Grants program to broaden its existing emergency shelter and homelessness prevention activities, to add new activities to rapidly rehouse homeless families and individuals, and to change the program's name to the Emergency Solutions Grant program. |
| Homeless Management Information System (HMIS) | The information system designated by the Continuum of Care to comply with 24 CFR part 580 and used to record, analyze, and transmit client and activity data in regard to the provision of shelter, housing, and services to individuals and families who are homeless or at risk of homelessness. Computerized data collection tool designed to capture client-level information over time on the characteristics and service needs of men, women, and children experiencing homelessness. HMIS is a software application used to collect demographic information on people served. The purpose of HMIS is to record and store client-level information about the numbers, characteristics and needs of persons who use homeless housing and supportive services and about persons who receive assistance for persons at risk of homelessness over time, to produce an unduplicated count of homeless persons for each Continuum of Care; to understand the extent and nature of homelessness locally, regionally and nationally; and to understand patterns of service use and measure the effectiveness of programs. |
| HMIS Agency Administrator | The primary contact between the Participating Agency and the HMIS Lead Agency on matters outlined in the HMIS Policies and Procedures; also an HMIS User role. |
| HMIS Data Standards | This document describes the Project Description Data Elements, Universal Data Elements, and Project-Specific Data Elements that are used in the HMIS electronic data collection system. |
| HMIS Data Standards Manual | Serves as a reference document and provides basic guidance on HMIS data elements for CoCs, HMIS Lead Agencies, HMIS System Administrators, and HMIS Users. |
| HMIS End-Users | Users of the HMIS at the Participating Agency level. |
| HMIS Federal Partners | The group of federal agencies that use the HMIS in the effort to end homelessness, which include U.S. Department of Health and Human Services (HHS), U.S. Department of Housing and Urban Development (HUD), and U.S. Department of Veterans Affairs. |

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| HMIS Fee Structure | <mark>Outlines the fees required to access the HMIS; an attachment to the HMIS Participation Agreement.</mark> |
| HMIS Lead Agency | The entity designated by the Continuum of Care in accordance with 24 CFR part 580 to operate the Continuum's HMIS on the Continuum's behalf. The party responsible for managing and administering the HMIS at the local level. |
| HMIS Participating Agency (Contributing HMIS Organization or CHO) | Agencies that agree to participate in the HMIS and have signed HMIS Agency Participation Agreements. An organization that operates a project that contributes data to an HMIS. |
| HMIS Security Officer | The person responsible for ensuring compliance with the security standards in the HMIS Policies and Procedures, at both the HMIS Lead Agency and the HMIS Participating Agency levels. |
| HMIS System Administrator | A member of the HMIS Lead Agency who manages the HMIS in accordance with HUD and other federal guidelines. |
| HMIS User | Any person who uses the HMIS. |
| HMIS User Agreement | An individual who uses or enters data in an HMIS or another administrative database from which data is periodically provided to an HMIS. Documentation to be signed by HMIS End-Users that covers Client Confidentiality, Ethics, User and Responsibilities; Appendix B of the HMIS Policies and Procedures. |
| HMIS Vendor | A contractor who provides materials or services for the operation of an HMIS. An HMIS vendor includes an HMIS software provider, web server host, data warehouse provider, as well as a provider of other information technology or support. |
| Housing Inventory Chart (HIC) | An inventory of housing conducted on a single night during the last ten days in January. It reflects the number of beds and units available on the night designated for the count that are dedicated to serve persons who are homeless. Categorized by five Program Types: Emergency Shelter; Transitional Housing; Rapid Re-housing; Safe Haven; and Permanent Supportive Housing. |
| Inferred Acknowledgement | Once clients receive a verbal explanation of HMIS, acknowledgement is assumed for data entry into HMIS. |

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| Informed Acknowledgement | A client is informed of participating in an HMIS system and then specifically asked to acknowledge and sign the Authorization for Disclosure of Health and/or Personal Information form. |
| Maine Continuum of Care (Maine CoC) | A community-based association focused on ending homelessness in Maine and charged with overseeing millions of dollars in federal funding under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act through the |
| McKinney-Vento Act | An Act to provide urgently needed assistance to protect and improve the lives and safety of the homeless, with special emphasis on elderly persons, handicapped persons, and families with children. |
| NERHMIS | New England Regional Homeless Management Information System (NERHMIS). |
| NOFA | Notice of Funding Availability (NOFA) establishes the funding criteria for the Continuum of Care (CoC) Programs. |
| Participating Agency | An agency that uses HMIS to collect data. |
| Participation Fee | A fee the HMIS Lead charges CHOs for participating in the HMIS to cover the HMIS Lead's actual expenditures, without profit to the HMIS Lead, for software licenses, software annual support, training, data entry, data analysis, reporting, hardware, connectivity, and administering the HMIS. |
| Point In Time (PIT) | A count of sheltered and unsheltered homeless persons on a single night in January. HUD requires that Continuums of Care conduct an annual count of homeless persons who are sheltered in emergency shelter, transitional housing, and Safe Havens on a single night. Continuums of Care also must conduct a count of unsheltered homeless persons every other year (odd numbered years). Each count is planned, coordinated, and carried out locally. |
| Program-Specific Data Elements (PSDE) | Data elements cooperatively developed by the HMIS Federal Partners that provide information about the characteristics of clients, the services that are provided, and client outcomes. |
| Protected Identifying Information (PII) | Information about a program participant that can be used to distinguish or trace a program participant's identity, either alone or when combined with other personal or identifying information, using methods reasonably likely to be used, which is linkable to the program participant. |

| Real-Time | The actual time during which an HMIS process takes place or an event occurs. |
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| Timeliness | An important measure to evaluate daily bed utilization rates and current client system trends. |
| Unduplicated Count | The number of people who are homeless within a specified location and time period. An unduplicated count ensures that individuals are counted only once regardless of the number of times they entered or exited the homeless system or the number of programs in which they participated. Congress directed HUD to develop a strategy for data collection on homelessness so that an unduplicated count of the homeless at the local level could be produced. |
| Universal Data Elements (UDE) | Data required to be collected from all clients serviced by homeless assistance programs using an HMIS. These data elements include date of birth, gender, race, ethnicity, veteran`s status, and Social Security Number (SSN). These elements are needed for CoCs to understand the basic dynamics of homelessness in their community and for HUD to meet the Congressional mandate. |
| U.S. Department of Health and Human Services (HHS) | A cabinet-level department of the U.S. federal government with the goal of protecting the health of all Americans and providing essential human services; one of the HMIS Federal Partners. |
| U.S. Department of Housing and Urban Development (HUD) | A Cabinet department in the Executive branch of the United States federal government that develops and executes policies on housing and metropolises; one of the HMIS Federal Partners. |
| Victim Service Providers | Consistent with section 401(32) of the McKinney-Vento Act, the term victim service provider Refers to a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs |

| Document Record | |
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