

# CARES Regional Homeless Management Information System (CRHMIS)



**Policies & Procedures Manual**  
**January 2017**



## Table of Contents

Introduction .....	3
Document Overview.....	3
History of the HMIS .....	3
Configuration and Purpose of the CARES Regional HMIS (CRHMIS).....	3
Purpose of the CR-HMIS.....	3
Goals.....	4
To Learn More about the CRHMIS .....	4
Administrative Structure: .....	4
Lead Agency.....	4
Implementation Committee.....	5
Advisory Committee.....	5
Data Committee .....	5
Communication Protocol.....	6
Helpdesk.....	6
System Administration .....	6
Program Customization.....	6
CRHMIS List-serve: .....	6
Technical Assistance.....	7
Grievances .....	7
Database Customizations .....	7
Continuing Education .....	7
Data Quality .....	7
Data Entry Requirements .....	7
Entry of Universal and Program Level Data Elements.....	8
Department of Housing and Urban Development (HUD) .....	8
Department of Health and Human Services (HHS) .....	8
Department of Veteran Affairs (VA).....	8
Data Quality Expectations .....	9
Data Ownership .....	9
Protocol for requesting data removal from the CRHMIS: .....	10
Interagency Data Sharing for Coordinated Care.....	11
Disclosure of Inclusion in the CRHMIS.....	12
Distribution of HMIS Data.....	12
Grievance Policy.....	13
For Clients.....	13
For Participating Agencies .....	13
HIPAA Compliance .....	14
HIPAA Compliance within HOPWA Programs.....	14
Monitoring of Participating Programs .....	14
CRHMIS Client Informed Consent and Release of Information.....	30



## **Introduction**

### **Document Overview**

In order to implement and maintain a region-wide Homeless Management Information System (HMIS), CARES, Inc. has developed the following Policies and Procedures Manual to outline and define the goals and objectives of the CARES Regional Homeless Management Information System (CRHMIS) program. This document delineates the roles and responsibilities of each agency and user involved in the program while establishing protocol for privacy, security, consumer disclosure, data quality and data ownership. Each participating agency must have the Director of that agency sign the Agency Agreement at the end of this document, indicating that the agency has reviewed these policies and procedures and will comply with them. Additionally, all users are required to sign the User Agreement (also at the end of this document) indicating that they have reviewed and will abide by these policies and procedures as well.

### **History of the HMIS**

In 2001, Congress directed HUD to implement a national data collection system to produce an unduplicated count of persons using homeless services. The Homeless Management Information System (HMIS) is a computerized data collection system used by multiple agencies to capture the number, characteristics and demographic information of persons utilizing these services. HUD did not create this database, nor was a specified vendor required. All communities are, instead, required to create their own compliant, relational database or contract individually with an outside software vendor. CARES, Inc., at the direction of, and in cooperation with, the CARES Regional HMIS Implementation Committee, chose the vendor Foothold Technology and the software Affordable Wider Area Regional Database System (AWARDS) for this purpose in 2004 and has maintained that relationship through the present day.

### **Configuration and Purpose of the CARES Regional HMIS (CRHMIS)**

The CARES Regional HMIS has a tremendous capacity to strengthen the collaboration among homeless service providers. Utilizing this coordinated system to count and track homeless trends in the region, the CRHMIS program gives providers the ability to collect data using a universal language accepted by HUD and, increasingly, other State and Federal funders. Methods and procedures for recording use of service are standardized, thereby giving all service providers a common denominator for discussions about the quantity and quality of services. Perhaps most importantly, homeless service providers, at the community, State and Federal level are working together to track those activities and trends. This information is then used at each level for allocation of funding and for community planning.

Representing a large area of upstate and mid-western New York, the CARES Regional HMIS captures client-level information over time, allowing agencies and communities to assess the characteristics and service needs of individuals and families experiencing homelessness, and at risk of homelessness, within the participating counties.

### **Purpose of the CR-HMIS**

- To meet HUD's requirement to produce an unduplicated count of homeless persons and households
- To understand the nature and scope of homelessness
- To develop, foster and maintain regional collaboration
- To facilitate continuity of care in homeless services
- To assist in the development of programs addressing the needs of homeless individuals and families through the collection and distribution of data.



## Goals

- **Unduplicated count:** The CRHMIS will provide an unduplicated count of the number of individuals accessing services from homeless service providers in the region.
- **Service tracking and trends:** The CRHMIS will identify demographic and service utilization trends.
- **Enhanced service delivery:** Through tracking client service trends, the HMIS will identify service areas in need of enhancement and growth.
- **Information for policymaking:** Data will be shared, in accordance with our stated policies, with homeless service advocates, government officials and researchers. This information will better inform our understanding of homelessness and guide public policy and program development.

## To Learn More about the CRHMIS

For general information about the CARES Regional HMIS or the policies and procedures contained in this document, please contact the Director of the HMIS Program and Services at [hmis@caresny.org](mailto:hmis@caresny.org) or by phone at (518) 489-4130. For information about becoming part of the CARES Regional HMIS, please contact the Executive Director, Nancy Chiarella, at [nchiarella@caresny.org](mailto:nchiarella@caresny.org) or by phone at (518) 489-4130 x105.

## Administrative Structure:

There are three major components to the CARES Regional Homeless Management System's administrative structure: Lead Agency, Implementation Committee, and Advisory Committee. As new communities join the HMIS a local level implementation committee may be convened in order to facilitate a smooth transition, however the Regional Implementation Committee is currently inactive on and will remain so unless the need arises for the Advisory Committee to re-activate it (such as a change in software vendor).

## Lead Agency

The lead agency for the CARES Regional HMIS is the Corporation for AIDS Research, Education and Services (CARES, Inc.). Of the participating CoCs, CARES, Inc is also the HMIS lead on the CoC Grant Application, the exception being Clinton County where the Evergreen Townhouse Community retains the HMIS Lead Agency position and CARES, Inc. is a sub-grantee.

CARES, Inc. is a not-for-profit agency whose mission is to assist local communities in expanding housing and other resources for homeless persons and/or persons with disabilities. In 2003, as the lead agency for coordinating the Continuum of Care groups in 6 Capital Region counties within four Continuums of Care, CARES was asked by providers to assume responsibility for the HMIS development and implementation for the Capital Region of New

York State, encompassing the original three counties that were in the (former) Capital Region HMIS of Albany, Rensselaer and Schenectady. Having led the initial implementation of the HMIS in those counties, CARES continues to act as the Director of the HMIS Program and Services for the HMIS by providing ongoing training, technical assistance, consulting, database management, reporting and help desk support to the Continuums of Care with the HMIS. Since the creation of the regional database in 2004, the number of counties served by the CARES HMIS has grown to include several counties well outside the Capital Region. As a result, and to reflect the scope and collaborative nature of the database, the name was changed in 2008 to the CARES Regional HMIS. In its role as Director of the HMIS Program and Services and Lead Agency, CARES also acts as an intermediary between the Software Solutions Provider (Foothold Technology) and participating agencies, handling the billing and payments for the software, keeping current with the HUD requirements and trends, attending regional and national conferences, participating in larger, regional collaborative HMIS administrator groups, keeping current with software updates, trainings, conferences and trends while also maintaining regular contact with HUD technical



assistance providers and staff. In addition to being a member of the Mid-Atlantic HMIS Director of the HMIS Program and Services group (MARHMIS) CARES is also involved in the New York State Office of Temporary Disability Assistance (NYS OTDA) project of creating a state-wide HMIS Data Warehouse and the HUD AHAR Redesign Project. The Director of the HMIS Program and Services, participates in committee meetings and calls regarding these projects with regular updates to the CRHMIS Advisory Committee.

### **Implementation Committee**

The role of the Implementation Committee is to establish community goals for the HMIS and support the lead agency with investigating, choosing and negotiating a contract with a software solutions provider. In addition, the Implementation Committee assists in coordinating the implementation of the HMIS community-wide, addressing issues and concerns along with the lead agency to help make using the HMIS both functional and efficient within the community. The original implementation team for CARES Regional HMIS has been disbanded as the implementation was completed in 2005 for the original three counties. As new communities join the CARES Regional HMIS, they may nominate a person or persons to work alongside the HMIS Director of the HMIS Program and Services to implement participation in the HMIS. While there is no longer an active implementation committee for the CARES Regional HMIS, smaller-scope implementation committees are often formed when bringing a new community into the CARES Regional HMIS in order to ensure a smooth and complete transition.

### **Advisory Committee**

The role of the Advisory Committee is to facilitate a better-working HMIS and continue to ensure that it meets the needs of both the Continuums of Care as well as meeting the program requirements described in the latest HMIS regulations put out by HUD. The Advisory Committee is made up of representatives from each CoC and meets regularly via webinar. It is the role of this committee to bring forward issues of particular concern to their respective Continuum of Care coordinating bodies in order to find solutions to problems or issues that arise from use of the HMIS. The Advisory Committee will also advise on policies regarding such issues as: consumer privacy and confidentiality, reporting schedules, information sharing, software choices, and user/agency monitoring and report directly back to their CoC as specified by each Continuum's policies.

The Advisory Committee meets the 4th Wednesday of each month. Committee representatives are nominated and approved by each CoC. All Advisory Committee members should be associated with HMIS Participating agencies and there is a limit of two representatives per CoC regardless of the CoC's geographic reach. Chairs/Co-chairs of the CoC are not eligible for membership on the Advisory Committee and there may only be one representative per participating agency, regardless of that agency's geographic scope. It is understood that in smaller, rural CoCs these restrictions may need to be reviewed or waved on a case by case basis. For more information on the committee or the process, or to get the log-on information for the next webinar, please contact the HMIS Director of the HMIS Program and Services at [hmis@caresny.org](mailto:hmis@caresny.org).

A list of CRHMIS Advisory Committee members, along with their contact information, is posted on the CARES, Inc. website at <http://www.caresny.org>. Please contact your advisory committee representative with any HMIS programmatic concerns that you would like to have addressed during the next meeting.

### **Data Committee**

The Data committees are organized and overseen by each local CoC. The Data Committee is made up of members of the CoC who are dedicated to reviewing and reporting on data to the CoC on a quarterly basis. Each Data Committee should have a chair or two co-chairs and at least 3 other committee members. The CoC HMIS and CoC Lead Administrative staff will work closely with the Data Committee chair/co-chairs, providing aggregate HMIS data on the demographics of consumers within the CoC and also assisting in identifying weaknesses and trends in the data by producing quarterly and annual reports. Please see addendums for details on each CoC's data committee role.

and responsibilities.

## **Communication Protocol**

### **Helpdesk**

All client-level communications are to go through the AWARDS system by filling out a helpdesk ticket. If that is impractical, or the question is from an administrative non-user, the request may be made via telephone. It is strictly prohibited to send client-level information (name, date of birth or social security number), even using client initials in place of names.

If a user does breach policy and send protected personal information (PPI) via e-mail or other unsecure means, the user license may be revoked until a phone meeting between the user, CARES staff and the program manager is held to discuss the breach in protocol and make sure that the user understands the protocol and is committed to following it.

The CRHMIS team works to address all helpdesk tickets within one business day; however that is not always possible. If there is an urgent helpdesk matter which needs more immediate attention, any user or administrator may send an e-mail or leave a voice mail with the Data Specialist, Customer Service Representative or Director of the HMIS Program and Services to alert the team to the more pressing issue so that it can be addressed more expediently.

### **System Administration**

There are several ways to contact the Director of the HMIS Program and Services of the CARES Regional HMIS. E-mail: Please send all (non PPI) e-mail communications to the HMIS Director of the HMIS Program and Services at [hmis@caresny.org](mailto:hmis@caresny.org). Often, due to the travel and meeting demands of the position, e-mail is the most expedient form of communication.

- Telephone: HMIS staff can be reached via phone at (518) 489-4130
- CoC Meetings: The Director of the HMIS Program and Services is available to attend meetings local to Albany, NY or to call in to rural CoC meetings upon request and with proper notice. Please contact the Director of the HMIS Program and Services at [hmis@caresny.org](mailto:hmis@caresny.org) or by phone at (518) 489-4130 to set up attendance in person or via phone.
- Webinar: Trainings, helpdesk, technical assistance and calls may be facilitated via a webinar format in order to better assist the user or to review reports, contracts and other deliverables.

### **Program Customization**

There are many ways that CARES, Inc. can assist in program customization for the participating agencies, including building custom forms and reports, assisting programs in integrating HMIS into their daily intake and reporting needs and negotiating system changes with the software vendor, Foothold Technology. These services are usually not part of the agency or CoC contract with CARES, Inc. and may come with an additional cost. Please see attached fee schedule for more information.

### **CRHMIS List-serve:**

In the past, the CRHMIS team has used various social media resources to reach out to users, but no one method reached all HMIS users and it began to get confusing. To solve this issue, the CRHMIS has built in a user-maintained subscription list on the CARES website. To subscribe, please go to the website at <http://www.caresny.org> and scroll to the bottom of the home page to register for any of the list-serves offered. All HMIS system level communications now go through the list-serve, so it is essential that all users enroll in this free service.



## **Technical Assistance**

Agencies having trouble integrating HMIS into their programs or getting needed reporting (both mandated and internal) from the database can set up an appointment with the HMIS staff to look for solutions and set up any further intervention that may be needed. Please contact the HMIS Director of the HMIS Program and Services, at (518) 489-4130 x103 or e-mail [hmis@caresny.org](mailto:hmis@caresny.org) for more information.

## **Grievances**

Please see the detailed Grievance Policy in this policy and procedures manual for information on the formal grievance policy at the agency, user or consumer level.

## **Database Customizations**

The AWARDS software can be modified to meet specific needs of an agency. Customizations that are above and beyond those created for the CARES Regional HMIS and HUD requirements will be completed at an additional expense to the agency. All private program-level customizations will be facilitated and contracted through CARES, Inc.

Modifications that could be completed at an additional charge may include, but are not limited to: additional number of users, supplementary training, software customization, increased security to allow transfer of data among specific agencies, increased data collection capabilities and other options that are outside those identified by the HMIS Implementation Team.

At all times, the Foothold Technology staff and CARES, Inc. will work to make sure that the database is compliant with HUD standards for data collection and reporting. CARES, Inc. will also work with other required programs under different funders to ensure relevant and accessible functionality.

## **Continuing Education**

It is extremely important that users stay current with HMIS regulations and changes. CARES, Inc. offers ongoing trainings in many areas of the AWARDS database, both on-line and in person. In order to ensure that all users have proper information and access, periodic attendance to training is required. All users who have not attended at least one training per year will be required to fill out and return a quiz which will be provided to the user via AWARDS messaging within 30 days of their log-in anniversary date. Failure to complete this quiz within 30 days of distribution will result in the loss of HMIS user access until such a time as a training has been attended or the quiz has been submitted.

## **Data Quality**

### **Data Entry Requirements**

In order for data to be meaningful across program sites, data must be consistently added and updated in the AWARDS system. HUD has identified minimum data standards with which all participating agencies must comply. Information for these minimum data fields must be gathered at intake and regularly updated throughout the client's stay within, and at discharge from, the program. While agencies are not currently required to maintain real-time data records, it is important that all data be complete and up-to-date within two weeks of client activity. Backdating permissions for entry of intakes and discharges more than two weeks beyond the intake date must go through an identified program manager and be sent as a request via the helpdesk ticketing system. Progress note and contact log input date ranges will be established on an agency by agency basis and backdating requests must also go through the identified program manager.



## **Entry of Universal and Program Level Data Elements**

Universal and program specific level data elements have been established by HUD and must be collected by all agencies serving homeless persons, regardless of program type. These data elements make it possible to obtain unduplicated estimates of the number of homeless persons accessing services from homeless providers and also provide basic demographic characteristics of people who are homeless, and their patterns of services. Collection of the Universal Data Elements (UDEs) will also allow measurement of the number and percentage of chronically homeless people who use homeless services. The HMIS software has safeguards built into the intake and discharge so that an intake may not be completed without filling in these data elements. However, due to periodic changes in HUD requirements and upgrades to the software, it may be necessary for some agencies to correct historical data to remain compliant with the current HUD Data and Technical Standards (Data standards 2016 and Technical Standards 2004). Additionally, the Continuum of Care may request that specific, non-required fields be filled out for community planning purposes.

With the October 2014 Data Standards changes more Federal partners began to also use the HMIS for their programs to use as a reporting system in the hopes that duplicate data entry in multiple systems can be mitigated somewhat. The following programs now have HMIS programming capabilities:

### **Department of Housing and Urban Development (HUD)**

- Office of Special Needs Assistance Programs (SNAPS)
  - Continuum of Care (CoC) Program
  - Emergency Solutions Grants (ESG) Program
  - Housing Opportunities for Persons with AIDS program (HOPWA)\*\*
  - HUD-Veterans Affairs Supportive Housing (HUD/VASH) \*\*
  - Rural Housing Stability Assistance Program (RHSP)\*\*

### **Department of Health and Human Services (HHS)**

- Administration for Children and Families (ACYF) – Family and Youth Service Bureau (FYSB)
  - Runaway and Homeless Youth (RHY) \*\*
  - Substance Abuse and Mental Health Services Administration (SAMHSA) \*\*
  - Projects for Assistance in Transition from Homelessness (PATH) \*\*

### **Department of Veteran Affairs (VA)**

- Supportive Services for Veteran Families Program (SSVF)
  - Community Contract Emergency Housing (HCHV/EH)\*
  - Community Contract Residential Treatment Program (HCHV/RT)\*
  - Domiciliary Care (HCHV/DOM)\*
  - VA Community Contract Safe Haven Program (HCHV/SH)\*
  - Grant and Per Diem Program (GPD)\*
  - Compensated Work Therapy Transitional Residence (CWT/TR)\*

*\*Participation in HMIS is not required as part of a funding requirement except for SSVF. The federal partners recognize that communities record Project Descriptor Data Elements and Universal Data Elements in order to facilitate completion of the HIC and PIT.*

*\*\* Please refer to the soon to be published program guides for each specific program for HMIS participation requirements.*





## **Data Quality Expectations**

As a HUD program, the CRHMIS must report annually on overall data quality in a variety of mediums, including but not limited to: the HMIS Dedicated Grantee Annual Performance Report (APR), the Annual Homeless Assessment Report (AHAR) and the CoC Grant Application (CoC wide data quality is reported in The Collaborative Application, formerly Exhibit 1). Additionally, each mandated agency must report program level data quality during the CoC APR report and CoC Grant Application (program level HMIS data quality is reported to HUD for each renewal) process.

Because of these reports and the constant use of HMIS data for agency level reporting, research and community planning, good data quality is paramount to the success of this program. To facilitate that, the following data quality expectations have been established:

1. Less than 5% missing or null data in any of the universal and program level data elements. This includes any responses of Refused, Unknown or Don't Know as well as incomplete (missing) data. Due to the nature of some programs (including but not limited to; outreach and drop in centers), that data quality measure will be reassessed on a program-by-program basis and data quality markers will be determined by the CoC Data Committee. Some program types may find, due to the difficult population served, that this is an unrealistic data quality expectation. Agencies with particularly difficult circumstances will be given individual waivers on data quality with separate data quality goals.
2. Data collection (intakes and discharges) will be current within 10 days
3. Updates to income, benefits, disability and housing status for consumers at least annually and at discharge
4. Problems with the database or errors in data will be reported, in writing, to the Director of the HMIS Program and Services immediately upon discovery
5. PDDE (Program Descriptor Data Elements known as HMIS Data in the Consumer Face Sheet) must be updated annually (within 30 days before or after the consumer's anniversary date) for programs which create an APR

To facilitate the best data practices possible, projects which are mandated to use the HMIS by their funders and have been found to be non-compliant with the above expectations will be reported to the funding entity (i.e. the CoC Collaborative Applicant, OTDA, Etc.) and may be required to have users and the program manager meet with a representative of the CoC and/or the CRHMIS to create a comprehensive action plan to address the problem areas. If, upon completion of this action plan, there is not adequate improvement in the identified problem areas, the Director of the CRHMIS will require a meeting with the program manager and agency Executive Director to create a more extensive action plan with agency level follow-up. At any time in this process, CARES may disable user log-ins until such a time as the agency is capable of proper data cleanup and entry into the HMIS.

If a mandated program continues to be out of compliance, Technical Assistance may be sought from the funding entity (OTDA, the VA and/or HUD) to assist in the process. Suspended programs will be listed as 'Not Participating' on the CoC Housing Inventory Chart and in any renewal applications within the CoC Grant Application which could influence funding decisions by the CoC governing body.

## **Data Ownership**

CARES, Inc. does not claim ownership of any client level data stored within the CRHMIS other than that which belongs to programs they administer. As such, the CRHMIS will not at any time change, distribute or delete data within programs without the direct instruction of the program in question.

If a community or agency withdraws from the CRHMIS, a request may be made to have their data transferred onto disk in CSV format and sent to them by post. This request, following the protocol at the end of this section, must be made within six months of discontinuing the relationship with the CRHMIS. After six months, the data will no longer be accessible to users or program managers and CARES, Inc. will discontinue the program within the database. If the agency wishes to have all data wiped from the CRHMIS, making it no longer available for historical



comparison or data analysis, a written request from the Agency Director must be sent, by post, to CARES, Inc., care of Nancy Chiarella, Executive Director. That request will be followed up with by the Director of the HMIS Program and Services and confirmation of the data purge will be sent to the requesting Agency Director once the process has been completed.

Following the parameters, set out by Loshin (2002), there are several parties who can claim full or partial ownership of CRHMIS data:

- A. **Creator:** The party that creates or generates the data
- B. **Consumer:** The party that uses the data
- C. **Funder:** The party that commissions the data
- D. **Packager:** The party that collects information for a particular use and adds value through formatting the information for a particular market or set of consumers
- E. **Subject:** The subject of the data claims ownership of that data

In the case of the CRHMIS, there is a hierarchy of ownership of data. It begins with the Subject (5) who can, at any time, submit a written request to CARES, Inc. to have his or her personal information removed from the database. These requests for data removal from the CRHMIS will be honored by CARES, Inc. when done through the correct protocol (below).

Secondly, The Consumer (2), or the agency that enters data, has the ability to claim the data within the CRHMIS that they have input as an agency. In this way, they can modify, delete or ask for a full purge as they desire. These requests for data removal from the CRHMIS will also be honored by CARES, Inc. when done through the correct protocol (below).

Last, the Packager (4), CARES, Inc., has ownership of the data within the database for the purposes outlined within this manual, namely:

1. The aggregation of data for reporting at the community level
2. Control of access to the data via usernames and log-ins
3. Data Quality Parameters to qualify data for admission into the CRHMIS
4. Helpdesk and reporting support requests

Data requests for PPI (client level data) must go through the contracted agency rather than the HMIS Director of the HMIS Program and Services. Upon written request by the Executive Director, CARES will grant access to client files as defined by the contractual agency. This access can range from read-only, aggregate data to client file level access. Similarly, though the data collected and packaged from the HMIS is often published and made available for use in grants, research and educational material, all such data aggregations and analysis belong to the packager, not the consumer who may be using that data for their own purposes.

## **Protocol for requesting data removal from the CRHMIS:**

### **Client (Subject) Request for Data Removal**

Please send a written, signed request to

CARES, Inc.  
C/O Director of the HMIS Program and Services  
200 Henry Johnson Blvd, Suite 4  
Albany NY 12210

Or fax to (518) 489-2237



Make sure to include your full name and which agency/agencies you visited and wish your records removed from. If you would like to also include your contact information, the HMIS Director of the HMIS Program and Services will verify your data removal once complete.

#### **Agency (Creator) Request for Data Removal**

Please send a written, signed request on agency letterhead to

CARES, Inc.  
C/O Director of the HMIS Program and Services  
200 Henry Johnson Blvd, Suite 4  
Albany NY 12210

Or fax to (518) 489-2237

Please specify if you would like to have a copy made of the data in CSV format, burned to CD. Make sure to include all programs you would like purged from the database, remembering that, once gone, there is no way to retrieve the information. The HMIS Director of the HMIS Program and Services will verify your data removal once complete.

## **Interagency Data Sharing for Coordinated Care**

A change in the way data sharing works will go into effect on January 1<sup>st</sup> 2017; the AWARDS feature of Expanded Consent and Client View. Agencies may opt OUT of data sharing at the program level and all consumers have to consent to the data share for each intake they complete with any agency, ensuring control of their own information remains in the consumer's hands. Please see below for more information on the process.

1. There are 3 levels of consent for the consumer; the intake staff must become familiar with the form and guide the consumer to ensure that they are choosing the option that best reflects their preference
2. Consumer data sharing will be covered by the overall consent form being used by the CRHMIS, however, the form within the HMIS will serve to indicate the level of interagency data sharing that occurs.
3. Refusal to participate in data sharing **in no way** impacts the ability of the project to enter the consumer into HMIS or serve the consumer; it simply prohibits the sharing of data with other participating agencies.
4. HIV/AIDS, DV, Behavioral Health and notes/logs are NEVER shared via the HMIS. This is to protect the privacy of consumers.
5. Any consumer in a project who has NOT agreed to share data MUST leave the default setting for user agreements. We are unable to completely remove this option from those agencies, so this will be monitored for compliance.
6. Substance Abuse, Mental Health, Runaway Homeless Youth (RHY) and HIV specific projects are NOT allowed to participate in data sharing at this time. The data share page must be left on the default of no sharing.
7. The signed ROI must match the consumer preference as recorded in the HMIS and be kept in the consumer file (electronic or physical) for monitoring purposes.



A PDF of the data sharing screen is available from your CARES, Inc. representative. Please contact them for additional information and training.

## **Disclosure of Inclusion in the CRHMIS**

A change in the disclosure of inclusion in the CRHMIS goes into effect on January 1, 2017. Previously a posted sign was sufficient for consumer disclosure, however the CRHMIS Advisory Committee, in conjunction with the System Administrator, have made the move to a signed Release of Information and Informed Consent form. These may be found both on the CARES website and in the appendix of this manual. This ROI must match the consumer data sharing preferences as stated above and be kept in the consumer file (electronic or physical) for monitoring purposes.

As per HUD policy, no agency may decline to provide services to a client based on refusal to be included in the HMIS. While it is desirable to include as many clients as possible in the CRHMIS for both internal and external reporting as well as community planning, we operate on a client-first model and work within the comfort level of those we serve.

If you have clients who refuse all HMIS data entry make sure that you keep an intake record separately so that, for agency level reporting, you will be able to include those households in the report.

## **Distribution of HMIS Data**

CARES Inc. will provide quarterly and yearly reports on the aggregate data collected within the HMIS to the corresponding CoCs as well as the Advisory Committee. CARES, Inc. will also make any AHAR data accepted by HUD available to the CoCs. This is public information and a copy of the latest and historical reports will be provided to anyone, upon written request. These reports are also published on the CARES, Inc. website after CoC approval.

Continuum-wide, aggregate data will be provided to HUD annually as required through the HMIS Annual Performance Report, Annual Homeless Assessment Report and CoC Grant Application.

In general practice, aggregate county-wide and individual agency-level data may be provided to users and administration of that agency upon request for data-quality reasons or to meet agency needs. Non-users within an agency requesting any aggregate or individual data must have the written consent of the agency Executive-Director.

Protected Personal Information (PPI), agency-level information, or any data that may potentially point out an individual or single agency will not be distributed in any community level or published reporting. Individuals, agencies or governing bodies who wish to obtain individual or agency-level data may request such data from the agency Director.

In limited circumstances, HMIS data, including PPI, may be used for the purposes of care coordination or research. In these cases, the minimum amount of information required to coordinate care shall be disclosed; it is up to the professional judgement of staff to determine what information will be shared. Because situations and circumstances differ, there is no set protocol for what information to disclose when—Codifying specific guidelines in this regard may in fact undermine the ability to coordinate services. Additionally, an MOU between the organization(s) and CARES, Inc. defining and limiting the scope of data use must be in place before any data may be distributed. Depending on the specific circumstances of the project, an MOU may also be put in place between CARES, Inc. and agency or agencies participating in the project. This MOU must clearly articulate the scope of work, how the data is accessed, which data elements are shared, the goals of the project and limitations of data usage. The CARES, Inc.



Executive Director or Director of HMIS Programs and Services must approve and sign off on each MOU that includes the sharing of PPI.

A list of projects in which HMIS is participating and the level of data sharing occurring is listed on the website at [caresny.org/privacy](http://caresny.org/privacy) for consumers to review. This list must be kept up to date and agencies must be informed when additions are made via the AWARDS Messages module and/or the CRHMIS list serve.

Consumers may choose to have their data removed from the database at any time by contacting the HMIS System Administrator and submitting a written request. All agencies with data concerning that consumer will be informed of the purge beforehand so that consumer records may be printed and stored according to agency policy.

### **Reporting with the HMIS**

The Director of the HMIS Program and Services regularly exports a system-wide aggregation of data. This data is analyzed to determine which agencies are compliant with the system and regulations. It is also used to identify areas of policy or data requirements that must be more thoroughly defined for individual agencies. Additional training or technical assistance is made available based on need.

Quarterly and annual reports are generated to share with the participants of the CARES Regional HMIS. These reports include a summary of the number and demographics of individuals and families participating in services in each program type for the given time period. **Aggregate reports do not include names, social security numbers, or any other identifying characteristics of individual clients.** Trends in the quarterly and annual reports are then examined and reported to the CoC governing body annually. Under no circumstances is client-level data distributed.

## **Grievance Policy**

### **For Clients**

All grievances regarding the handling of your personal information by an agency within the HMIS should be addressed to that agency. If you believe your grievance has not been sufficiently resolved by your agency, you may make a complaint to the HMIS Director of the HMIS Program and Services at:

CARES Inc  
ATTN: HMIS Director of the HMIS Program and Services 200  
Henry Johnson Blvd, Suite 4  
Albany NY 12210  
Phone: (518) 489-4013 fax (518) 489-2237

*CARES will attempt a voluntary resolution of the complaint and by ensuring that the participating agency is acting with accordance to the HMIS agency agreement. Note that CARES does not provide legal services.*

### **For Participating Agencies**

Complaints regarding the administration of the HMIS may be made to either CARES Inc.'s HMIS Director of the HMIS Program and Services or Executive Director at:

CARES Inc  
ATTN: HMIS Director of the HMIS Program and Services/Executive Director  
200 Henry Johnson Blvd, Suite 4  
Albany NY 12210  
Phone: (518) 489-4013 fax (518) 489-2237



Telephone complaints may be recorded for better customer care. CARES will follow up each complaint in writing and, as appropriate, bring the complaint to the CoC leads and/or the CARES Regional HMIS Advisory Committee.

## **HIPAA Compliance**

Compliance with HIPAA regulations is only required for covered entities, such as community service providers that are also health care providers. For agencies that meet these criteria, participation in the HMIS requires compliance with HIPAA as defined and arranged within the agency. CARES, as the Director of the HMIS Program and Services, follows HIPAA precautions with ALL consumers in ALL agencies, runs background checks on all System level users and requires HIPAA and EHR training for all HMIS Administrative staff.

### **HIPPA Compliance within HOPWA Programs**

On October 9<sup>th</sup>, 2014 the Office of HIV/AIDS Housing released an updated Confidentiality User Guide. These policies and procedures have been modified to be compliant with this version of the guide. The HMIS is inherently HIPAA (and HITECH) compliant, but the CRHMIS team is aware that additional precautions must be made as a support team with access to PPI. As required by HOPWA Regulation 24 CFR 574 and 27F, proper security is taken with all electronic and physical documentation of identifying consumer data, written procedures are in effect, HIPAA training is undertaken by all CRHMIS staff and the revised Agency Agreement found at the back of this document acts as an MOU between each participating agency and CARES, Inc. For copies of these policies or questions about physical or electronic security, please contact the CRHMIS System Administrator at (518) 489-4130 x103 or at [hmis@caresny.org](mailto:hmis@caresny.org).

## **Monitoring of Participating Programs**

In order to ensure compliance with this manual and HUD privacy and security requirements, CARES, Inc. will do periodic monitoring of all programs participating in the HMIS; both mandated and voluntary. This monitoring will review data quality, data completeness, and compliance with the electronic and physical privacy and security procedures outlined in this manual.

Programs found to be out of compliance with the above will be evaluated by the HMIS Director of the HMIS Program and Services and a Plan of Correction; including additional training, measurable goals, a realistic timeline for correction and further monitoring, will be put in place.

Frequency of monitoring visits within a community, agency or program will be at the discretion of the HMIS Director of the HMIS Program and Services. Monitoring Visit results will be shared with the Collaborative Applicant and/or CoC leads for the community and may be discussed with the HMIS Advisory Committee.

## **Participation**

All recipients of HUD McKinney-Vento funds are required to participate in the HMIS. This includes recipients of Emergency Solutions Grants (ESG), Supportive Housing Program (SHP), Shelter Plus Care (S+C) and Section 8 Mod Rehab for SRO.

In addition to McKinney-Vento-funded recipients, other housing assistance programs may require participation as a condition of funding. Agencies who receive funding via the Housing Opportunities for Persons with AIDS (HOPWA) program and are dedicated to serving homeless persons must participate. Providers of Grant and Per Diem, Supportive Services for Veteran Families (SSVF) or Veteran Affairs Supportive Housing (VASH) voucher programs by



the Department of Veterans Affairs (VA) are also subject to ongoing participation mandates, as are some NYS OTDA funded programs including the Solutions to End Homelessness Program (STEHP). CARES, Inc. works closely with HUD and NYS OTDA to ensure the program data collection and reporting requirements are consistently met by the database and administration of this program.

While not all service agencies are mandated to participate, both HUD and local Continuums of Care encourage participation by all agencies who serve the homeless population, including those funded by other federal programs or non-government sources. Participation by organizations that do not receive HUD Continuum of Care funding is voluntary (other than for the exceptions noted), but strongly encouraged in order to achieve an accurate picture of homeless services in the region. Because overall participation by all agencies that provide homeless housing services is rated by HUD annually through the CoC Grant Application process.

### **Benefits to Non-Mandated Programs**

Voluntary participation by non-mandated programs and agencies helps the community meet the threshold for new funding and retain current funding for current homeless housing, create new homeless housing and assist with community planning and development. Through this collaborative effort, non-mandated agencies receive the benefit of a more sophisticated homeless services network in their community, better access to data for research, grant writing and program planning and representation for those they serve to HUD and other Federal partners through standard HMIS reports such as the HMIS Dedicated Grantee Annual Progress Report and the Annual Homeless Assessment Report. Additionally, and perhaps most importantly, access to more and better housing opportunities for persons and households experiencing homelessness is potentially created through renewals, new projects and bonus projects through the CoC Grant process, thus reducing the burden of local agencies, both not-for-profit and government, trying to assist and house homeless persons and families.

### **Benefits to Continuums of Care**

In addition to fulfilling the HUD requirements, participation in the HMIS enables the participating counties to report accurate statistical data to funders and policy makers regarding topics such as financial resources, county of origin, housing utilization and more. It ensures that all local providers are using a common intake instrument, thereby providing the most effective and efficient service to clients while allowing cross-agency data analysis for the community. The reporting capabilities allow agencies to generate accurate and timely reports, reducing time spent away from client services for monitoring, reporting and case review. Electronic management of client records also allows for remote access, reduced use of office resources such as paper, printer ink and office supplies while providing consistent, neat, easily accessed files to present to reviewers, some of whom are allowing remote monitoring and auditing at this time.

## **Privacy**

Baseline privacy standards are required of all programs and must balance the need to protect the confidentiality of client data with the practical realities of homeless service provision. Each agency is required to review and/or develop a privacy policy specific to the individual agency's needs which includes HMIS activities as it pertains to confidential client data in electronic and hard-copy formats. A copy of the above-referenced agency privacy policy must be provided to CARES, Inc., as the HMIS Director of the HMIS Program and Services and, if the agency has a website, must be published thereon in accordance with HUD's 2004 Privacy and Security standards.

CARES, Inc. applies strict privacy policies and procedures internally, compliant with all HIPAA, HOPWA and HITECH rules. For copies of these policies, please contact or questions about physical or electronic security, please contact the CARES, Inc. Security Officer, Tersha Choy, at [tchoy@caresny.org](mailto:tchoy@caresny.org) or via phone at (518) 489-4130x101.



## **Participation Fees**

Fees for participating in the HMIS vary from community to community and project to project and may require a contract with CARES, Inc. for inclusion in the HMIS. Please contact the Director of the CARES HMIS Program and Services department for information regarding your specific project type and community at [athlessen@caresny.org](mailto:athlessen@caresny.org) or (518) 489-4130.

## **Responsibilities**

Participating agencies and users have specific responsibilities when using the HMIS to ensure proper functioning of the system, accurate data collection, as well as the privacy and security of all consumers. These responsibilities are outlined below.

### ***Participating Agency Responsibilities***

CARES will enter into a Business Associates Agreement with agencies that are eligible to participate in the HMIS. The Business Associates Agreement will outline the specific manner in which CARES will utilize the data submitted in the HMIS.

The participating agency is responsible for all activities associated with agency staff access and use of the Foothold Software System (AWARDS). The agency will be held responsible for any misuse of the software system by the designated staff.

Each participating agency must:

1. Establish operating practices to ensure organizational adherence to the HMIS Policies and Procedures.
2. Establish a privacy policy to ensure the protection of confidential client data. A copy of this policy should be provided to the Director of the HMIS Program and Services and, if an agency website exists, be published thereon.
3. Communicate operating practices, including privacy protection and user responsibilities, to all agency users. Agencies should document that each user understands and accepts the responsibilities associated with use.
4. Monitor user compliance and periodically review control decisions.
5. Edit and update agency information, including staff, location, and capacity, as needed.
6. Notify all users in their agency of interruptions in service.
7. Detect and respond to violations of the Policies and Procedures or agency procedures.
8. Maintain complete and accurate client records for participating programs within the HMIS.
9. Monitor that users respectfully collect data for all required fields in the intake and discharge, indicated by an asterisk, to the best of their ability. This includes required fields that may not be required by HUD for all program types but are used for reporting at the local, State and Federal level, and as such are important to the proper collection and interpretation of data from the HMIS as well as the assurance of continued funding.

Agencies must follow all privacy and security requirements outlined in this manual in order to participate in the CARES Regional HMIS.

### **User Responsibilities**

Each user within a participating agency is responsible for maintaining client privacy and protecting each client's protected personal information. A User ID and Password will be provided to each User within the agency by the





Director of the HMIS Program and Services at the written request of the Agency Executive or Program Director once training has been completed.

All Users must understand and accept the following responsibilities for utilizing the HMIS:

1. The User ID and Password are to be used by the assigned user only and must not be shared with anyone. All Users will take all reasonable means to keep passwords physically secure.
2. All Users will log-off the system before leaving the work area.
3. Users must **not** decline services to a client or potential client if that person refuses to allow entry of information in the HMIS (except if that policy is over-ridden by agency policy or if the information is required to be collected as a condition of receiving services).
4. The user has primary responsibility for information entered by the user. Information entered by users is truthful, accurate and complete to the best of the user's knowledge.
5. Users will not solicit from or enter non-required information about clients into the HMIS unless the information is required for a legitimate program purpose such as to provide services to the client.
6. Any hard copies of personally identifiable (client-level) information printed from the HMIS must be kept in a secure file, and destroyed when no longer needed.
7. All Users must immediately notify the Agency Executive Director should a breach in security be recognized or suspected.
8. Users may only access the HMIS from a designated terminal, following agency guidelines for electronic access of records. Access to the HMIS from public or unsecured computers and networks is prohibited.
9. Users may not send identifying information on clients through standard e-mail but, instead, should utilize the secure messaging feature of the HMIS-AWARDS system for all client-based communications, preferably through a helpdesk ticket.
10. Users agree to respectfully collect all required fields in the intake and discharge, indicated by an asterisk, to the best of their ability. This includes required fields that may not be required by HUD for all program types but are used for reporting at the local, State and Federal level, thus are important to the proper collection and interpretation of data from the HMIS as well as the assurance of continued funding.

### **Lead Agency (CARES, Inc.) Responsibilities**

CARES, Inc., as the Lead agency for the CRHMIS, will monitor compliance with the established policies and procedures while providing the following services:

1. Internal compliance with all HUD, HIPAA and HITECH regulations
2. Monitoring of privacy and security compliance of all participating programs
3. Access for questions and concerns with the Software Solution Provider, Foothold Technology
4. Assistance with HUD mandated reporting on an agency/CoC level
5. AHAR and CoC Grant Application reporting
6. Annual and Quarterly CoC reports on basic, aggregate client demographics
7. Creation, deletion and monitoring of user log-ins and passwords
8. Daily helpdesk (work days) for standard helpdesk issues
9. Evaluations and strategies for better use of the HMIS in regards to HUD reporting and data quality
10. Monitoring of HUD policy and procedure regarding HMIS with regular CoC updates
11. Monthly New User Trainings (in a group setting)
12. Remote access to all in-house trainings upon request
13. Regular updates on HMIS policy, procedure and the database via a variety of mediums
14. Rapid turn-around for addressing all help desk tickets
15. Ongoing CoC level data quality checks and follow-up

**Additional fees may be assessed for HMIS TA services that are not within the normal scope of CARES Inc.'s HMIS Director of the HMIS Program and Services duties; including, but not limited to, the following:**



- Agency/Program evaluation for use of the database beyond CoC requirements
- Agency specific report and form building
- Agency specific training on non-HUD mandated features of the database
- Customized internal or external reports not related to HUD
- Large helpdesk requests due to user error
- Program level data quality and clean-up assistance
- Training on basic computer skills which complement the use of the HMIS, including but not limited to; internet, Excel, keyboarding and MS Word Document creation

### **CoC Lead Responsibilities**

The CoC leads in each community will be presented with a Memorandum of Understanding (MOU) which requires close involvement in the reporting and regulation of HMIS data. By signing this, the CoC leads, on behalf of their CoC, agree to the terms and conditions outlined therein.

## **Security**

Certain electronic security precautions are required of each agency:

- Install and maintain a firewall on the user's computer or the agency network
- Password protected screensavers set at no more than 5 minute intervals
- Automatically updating antivirus software installed and maintained on every internet-accessible computer
- Keep the Operating System on each HMIS access computer terminal up to date with the latest security devices
- All users must attend a formal HMIS training prior to being assigned a username and password in the database. This will ensure that proper training on security, policy and procedure has been established for all users in the database. Sharing of usernames and log-ins is strictly prohibited for security reasons.

In the event a user no longer needs access to a program or leaves the employ of the agency, the program manager or Executive Director **MUST** contact the HMIS Director of the HMIS Program and Services within 24 hours of the end of employment so that the active user account can be disabled. This can be done in advance, so Directors and administrative staff are encouraged to alert the Director of the HMIS Program and Services as soon as it is known that a user account will no longer be needed.

In order to facilitate the privacy and security of HMIS consumers, any user account that is inactive for 30 days will be deactivated **until the HMIS Director of the HMIS Program and Services is contacted by a program manager or agency officer in writing** (an e-mail from the agency email address is adequate). If the user is inactive for more than 90 days, or if there has been a significant data elements or policy change during the time off the system, retraining may be required prior to regaining access to the HMIS.

It is recommended that a Written Information Security Policy (WISP), with an electronic information policy, be in place for all agencies using HMIS. For a copy of the CARES, Inc. WISP, please contact the HMIS Director at [hmis@caresny.org](mailto:hmis@caresny.org) or via phone at (518) 489-4139 x103.

### **User access to the HMIS**

The AWARDS software is a web-based software system accessed via the Internet. Each agency user is assigned a unique log-in name and a password to access the system. Within the agency's set-up in the HMIS, each user is assigned specific permissions to view and work only with those programs and records to which he or she has been



assigned. A user in one program within an agency is prohibited from viewing or modifying any records in another program area unless express permission has been given by a program supervisor or Executive Director. No user can access the files of any other agency. All users are reminded to never share their log-in names or passwords with anyone else, and not to keep reminder notes in obvious areas.

Access to the HMIS is granted by the Director of the HMIS Program and Services. When an agency needs to add or remove a user, there must be a written request (e-mail, FAX or AWARDS message) from the Program or Executive Director requesting the action. All new users must attend training prior to being assigned a username and password.

## **Software Security**

Maintaining individual client privacy is among the highest priorities in managing the HMIS. The AWARDS software uses the highest encryption currently allowable by law along with the use of SSL (Secure Sockets Layer) technology. Foothold Technology uses several hardware and software firewalls and AWARDS keeps warm backups locally and sends daily backups to a separate data center. All data is stored in two data centers in two different states on 8 different electric grids. Warm copies are available in 2-hour intervals and daily copies are available in 24-hour intervals. Information sent from individual agency sites cannot be unscrambled. In addition, a highly sophisticated series of user names and passwords protect data from unauthorized viewing and manipulation within individual agencies, ensuring no one has access to information they should not see. Data security is also monitored by the Director of the HMIS Program and Services through regular reports and activities. For questions about physical or electronic security of the AWARDS software, please contact the CARES, Inc. Security Officer, Tersha Choy, at [tchoy@caresny.org](mailto:tchoy@caresny.org) or via phone at (518) 489-4130 x101.

## **Software**

As selected by the HMIS Implementation Committee, CARES, Inc. has contracted with Foothold Technology as the software vendor for the CARES Regional HMIS. Foothold's software, AWARDS, is a web-based system in which users access the system via the Internet and includes a comprehensive case management system that each agency can utilize for managing client records, case notes, and referral information if desired. For more information on how to fully utilize these components, please contact your customer service rep or the Director of the HMIS Program and Services at [hmis@caresny.org](mailto:hmis@caresny.org) or by phone at (518) 489-4130

## **Technical Assistance**

All concerns with utilizing the HMIS system should be directed to the HMIS Director of the HMIS Program and Services at CARES, who can be reached by phone at (518) 489-4130 x103, by e-mail at [hmis@caresny.org](mailto:hmis@caresny.org) or through the HMIS (AWARDS) internal messaging and helpdesk modules for confidential e-mail capability. CARES offers assistance to agencies who would like to better integrate the use of the HMIS software into existing procedures through telephone and web conferences as well as occasional site visits. Assistance in gathering agency-wide or county-wide aggregate information for funding sources and grant writing is also available when a written request is made at least a week in advance.

**CARES will provide, at no additional fees, the following TA services:**

- Access for questions and concerns with the SSP, Foothold Technology
- AHAR and CoC Grant Application reporting
- Annual and Quarterly CoC reports on basic, aggregate client demographics
- Creation, deletion and monitoring of user log-ins and passwords
- Daily helpdesk (work days) for standard helpdesk issues
- Evaluations and strategies for better use of the HMIS in regards to HUD reporting

- Monitoring of HUD policy and procedure regarding HMIS with regular CoC updates
- Monthly New User Trainings (in a group setting)
- Monthly user-groups on topics chosen with user-input
- Quarterly Advanced User Trainings (in a group setting)
- Remote access to all in-house trainings upon request
- Regular updates on HMIS policy, procedure and the database via a variety of mediums
- Rapid turn-around for addressing all help desk tickets (one business day)
- Ongoing CoC level data quality checks and follow-up
- Access to social networking for updates and networking among users and administrators

**Additional fees may be assessed for HMIS TA services that are not within the normal scope of CARES Inc's HMIS**

**System Administer duties; including, but not limited to, the following:**

- Agency/Program evaluation for use of the database beyond HUD requirements
- Agency specific report and form building
- Agency specific training on non-HUD mandated features of the database
- Customized internal or external reports not related to HUD
- Large helpdesk requests due to user error
- Program level data quality and clean-up assistance
- Training on basic computer skills which complement the use of the HMIS, including but not limited to; internet, Excel, keyboarding and MS Word Document creation

## **Training**

CARES offers on-going user training for new and current users who need a refresher on the basics. Training sessions will be provided in 1-4 hour sessions for which attendees are required to sign up in advance. Users participating in each training session are expected to be computer-literate and to attend the full training session. No individual will be given access to the database until initial training has been completed. Access permission for each new user must be given to the Director of the HMIS Program and Services prior to new user set-up. The Executive Director or Program Manager may e-mail or fax permission information to CARES Inc. While users will be allowed to attend training prior to this verification, no active agency access will be given until the permission has been received and processed.

Additionally, Advanced User trainings, Program Director and Administrator trainings, recurring user-groups and periodic CoC updates will be held regularly to help agencies best use and monitor the HMIS system and accompanying software. A list of all available trainings and groups, along with registration information, is available and regularly updated on CARES' website (<http://www.caresny.org>) and all social networking mediums. All trainings and user-groups are available remotely via webinar to accommodate those who cannot attend in person. Remote access requires either a microphone and speaker system, or a regular telephone in conjunction with a computer.

## **User Access to the Database**

Each program within an agency will be permitted 15 user accounts to access the HMIS. The HMIS Director of the HMIS Program and Services will have the ability to add these users to the system as needed. Agencies exceeding the permitted number of system users will be charged an additional monthly software fee\* plus a service fee for additional CARES' staff time to be determined after a scope of work has been completed.



## **Addendum A: Costs of Additional Services**

### ***Pricing Structure***

#### **Agency and Community level projects:**

Pricing for projects is variable and based on a rate of \$80 per hour. Please contact the HMIS Director of the HMIS Program and Services at (518) 489-4130 x103 for more information on individual projects including, but not limited to:

- Basic computer instruction
- Agency level training on non-CoC features of the HMIS
  - Operational design and the HMIS
  - Data quality issue resolutions
  - Large help-desk ticket resolution
- Database customization via form and report building

#### **Continuum of Care inclusion in the CARES Regional HMIS**

There are standard contracts available for CoCs interested in joining with the CARES Regional HMIS. Please contact CARES, Inc. for more information. We are dedicated to working with the communities we serve in order to create a service and price base that meets the individual needs of those we serve. Please contact the HMIS Director of the HMIS Program and Services at (518) 489-4130 x103 for more information.

#### **Non-Continuum of Care Agencies and Programs**

As more and more program types which are not covered under the CoC umbrella are mandated to participate in the HMIS, CARES, Inc. has developed pricing strategies to address their specific needs and help their compliance via inclusion within the HMIS. Please contact the HMIS Director of the HMIS Program and Services at (518) 489-4130 x103 for more information.

#### **Domestic Violence Dedicated Programs**

DV programs are prohibited from participating in the HMIS by the Violence Against Women Act (VOWA). There are some funding types, however, which require a comparable database to the HMIS for these programs. While each agency is responsible for creating/contracting for this database, your HMIS Director of the HMIS Program and Services is responsible for ensuring that this database meets HMIS regulations. contact the HMIS Director of the HMIS Program and Services at (518) 489-4130 x103 for more information on this topic and to help ensure the compliance of your database with the dynamic structure of the HMIS.

#### **Additional Users**

Each program within an agency will be permitted 15 user accounts to access the HMIS. The HMIS Director of the HMIS Program and Services will have the ability to add these users to the system as needed. Agencies exceeding the permitted number of system users will be charged an additional monthly fee.

16-30 users total \$500 monthly

31-45 users total \$1000 monthly

46-60 users total \$1,500 monthly

61-75 users total \$2,000 monthly

76+ users must separately contract with the vendor, Foothold Technology, and upload to the HMIS

*\*These fees are based on set costs from the software vendor. There is no intermediate category for additional 10-15 users and CARES, Inc. does not receive any administrative income from additional user fees, however, administrative fees for staff time may be assessed depending on the scope of the project.*

## CARES Regional HMIS Consumer Information Consent Form



Information collected in the HMIS database is protected in compliance with the standards set forth in the Health Insurance Portability and Accountability Act (HIPAA) and the U.S. Department of Housing and Urban Development HMIS Data Standards. Every person and agency that is authorized to read or enter information into the database has signed an agreement to maintain the security and confidentiality of the information. Any person or agency that is found to violate their agreement may have their access rights terminated and may be subject to further penalties.

### I UNDERSTAND THAT:

The partner agencies may share limited identifying information about the people they serve with other parties working to end homelessness.

The release of my information does not guarantee that I will receive assistance. This release of information includes public funded cash disbursements received during the past 3 years.

This authorization will remain in effect for a minimum of 36 months unless I revoke it in writing, and I may revoke authorization at any time by signing a written statement or Revocation form.

The following personal information will not be shared with any HMIS partner agencies via this HMIS computer system.

1. HIV/AIDS information, such as status, diagnostic test results, mode of transmission, sexuality.
2. Domestic violence information, such as abuse history, abuser information, trauma information.
3. Behavioral health information, such as substance and alcohol abuse and mental illness.
4. Clients supportive services contacts, medication information and case notes.

If I revoke my authorization, all information about me already in the database will remain, but will become invisible to all of the partner agencies, except public (county, state or federal) cash disbursements.

If I am applying for county, state or federal cash disbursements such as ESG or SSVF, this information will be shared with Collaborative users and State agencies.

By signing this form, I agree to share the following level of information with other partner agencies via the HMIS computer system:

- ☐ I agree to share my name (first, middle, last), gender, program enrollment, and exit dates information via the HMIS system with other partner agencies.
- ☐ I agree to share my name, gender, ancestry, program enrollment and exit dates, demographic information, miscellaneous section, and contacts information, cash disbursements via the HMIS system with other partner agencies.
- ☐ I do not agree to share any of my information via the HMIS system with other HMIS partner agencies via the HMIS computer system. Exception is cash disbursements as noted above.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Agency: \_\_\_\_\_ Program: \_\_\_\_\_



## Expanded Consent and Client View Guide

### AWARDS QUICK REFERENCE GUIDE

The Expanded Consent and Client View feature allows users to view certain client details within Consumer Lookup for clients who have multiple program histories between agencies. These details include the last four digits of the client's SSN, and events recorded within the Client History Report. This guide will describe what details are visible under various circumstances.

To view client details, complete the following steps:

1. From the **AWARDS Opening Menu** page, click **Consumer Lookup**. The **Consumer Lookup** page is displayed.
2. For full access to client details, enter the client's full SSN in the **SSN** field, and in the **First Name** and **Last Name** fields, type the first two letters of the consumer's first and last names, respectively.
3. Click the **Limit Search Results** to drop-down arrow and select the number of matches that should be displayed in the lookup results.
4. Click **SEARCH**. The **Consumer Lookup Results** page is displayed. For clients who have program histories in multiple agencies, the last four SSN digits and Client History Report icon may be available, depending on consent and search information used. Refer to the chart below.

Search Information	Consent Given by Client within OTHER Agency	Agency is marked as such	Last 4 SSN Digits shown	Client History Report available?
First Name Last Name Full SSN	A	YES	YES	NO
First Name Last Name Full SSN	B	YES	YES	YES
First Name Last Name Full SSN	C	NO	n/a	n/a
First Name Last Name No SSN	A or B	YES	YES	NO
First Name Last Name No SSN	C	NO	n/a	n/a
Any	A, B or C – marked as EXPIRED	NO	n/a	n/a

5. If displayed, click the Client History Report icon  to the left of the client and agency records to be viewed. This version of the report will include any program histories that contain an effective level B consent, and list events in chronological order *without* links to view details.

The process of viewing client details is now complete.

## CRHMIS Client Informed Consent and Release of Information

\_\_\_\_\_ (agency name) \_\_\_\_\_ participates in the CARES Regional Homeless Management Information System (CRHMIS). This means that we collect information about your household and input it into a secure and private database that allows us to keep track of that information to better assess and serve your needs. The CRHMIS is dedicated to the privacy and safeguarding of the information collected and input into the HMIS database and does not publish identifying, client level data. For more information, please see our complete policy and procedure manual, which includes information on opting out of the HMIS, data ownership and a list of research and coordination projects that use HMIS information at [www.caresny.org/HMIS-policies](http://www.caresny.org/HMIS-policies).

To better assist in the coordination and provision of services, we are requesting your permission to share limited information about you with other homeless services providers. As the owner of your own information within the CRHMIS, you have the right to choose whether or not other users of the system can see any of your personal information and on what level. HIV/AIDS information, Domestic Violence information, Behavioral health (mental illness and substance abuse) and client notes are NOT shared through the HMIS. This consent will be in effect for a minimum of 36 months but may be revoked at any time.

**Please check the (1) box below which indicates the level at which you are willing to share your information with the homeless services coordinators and providers in the community;**

☐ I agree to share my name, gender and program enrollment history through the HMIS with other provider homeless services agencies.

☐ I agree to share my name, gender, program enrollment history, demographic, income and contact information through the HMIS with other partner homeless services agencies.

☐ I do NOT agree to share any of my information through the HMIS with other partner homeless services agencies.

***By signing this form, I agree to share the above level of information with other partner agencies via the HMIS Computer System:***

\_\_\_\_\_  
PRINTED name of Client

\_\_\_\_\_  
Signature of Client, Guardian or Power of Attorney

\_\_\_\_\_  
Signature of Witness

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date