Long Beach Continuum of Care

Homeless Management Information System (HMIS)

Policies and Procedures

Department of Health and Human Services

Homeless Services Bureau

Revised July 2022

1. Introduction
1.1. City of Long Beach Continuum of Care

VISION

Every resident of Long Beach will be able to access safe, decent and affordable housing, food, and medical services.

MISSION

The Long Beach CoC is collaborative in its approach, embraces diversity and practices innovations city-wide. It is a community-based system of care that effectively plans, manages, and delivers homeless assistance and resources to both individuals and families, at-risk or experiencing homelessness, to promote economic self-reliance and housing stability.

PURPOSE

The City of Long Beach CoC serves as the locally designated primary decision-making group whose purpose and scope is to steward the planning, coordination, and implementation activities of the Continuum of Care (CoC) program as set out in the Code of Federal Regulations Title 24 Section 578 (24 CFR 578). Under the HEARTH Act and 24 CFR 578, the main responsibilities of a CoC include:

- Operating the CoC system
- Implementing a Homeless Management Information System (HMIS)
- CoC Planning
- Operating a Coordinated Entry System (CES)
- Preparing Annual Applications for CoC Funds

1.2. Project Summary

The United States Department of Housing and Urban Development (HUD) developed the data collection and reporting requirements for the Homeless Management Information System (HMIS) through the 2004 HMIS Data and Technical Standards Final Notice and subsequent updates to the HMIS Data Standards Manual, in collaboration with federal partners. The 2004 Technical Standards remain in effect, while the current Data Standards are updated periodically and provide the documentation requirements for the programming and use of all HMIS and comparable database systems. HUD requires that each Continuum of Care (CoC) designate a single HMIS for the geographic area and ensure that the HMIS is administered in compliance with requirements.

Designated by the Long Beach CoC, the City of Long Beach Department of Health and Human Services (DHHS) serves as the HMIS Lead Agency to operate and manage the local HMIS. The role as the HMIS Lead Agency involves ensuring compliance with

HUD's data collection, management, and reporting standards and utilizing and collecting client-level data and data on the provision of housing and services to support homeless individuals and families and persons at-risk of homelessness.

Currently, participating agencies are using LB HMIS to collect data for homeless and housing related programs throughout the City of Long Beach. These agencies may include homeless service providers, housing agencies, healthcare providers, governments and other appropriate service providers. The information entered into LB HMIS helps coordinate the most effective services for people experiencing homelessness in Long Beach. While accomplishing these goals, the DHHS recognizes the privacy of client needs in the design and management of the LB HMIS. These needs include both the need to continually to improve the quality of homeless and housing services in the City of Long Beach, and the need to vigilantly maintain client confidentiality, treating the personal data of our most vulnerable populations with respect and care. As the guardians entrusted with this personal data, there is both a moral and a legal obligation to ensure that this data is being collected, accessed and used appropriately. The needs of the people we serve are the driving forces behind the LB HMIS.

1.3. Terminology

Definitions of some of the terms used in this manual are as follows:

Agency Administrator: The person responsible for system administration at the agency level. Responsible for adding and deleting users, basic troubleshooting, quality assurance of data and organizational contact with the HMIS Lead Agency.

Agency End User: Agency assigned HMIS users.

Agency: Provider who is participating in LB HMIS.

Affiliated Agency: Providers not funded by LB DHHS who participates in the LB HMIS.

Agency Participation Agreement: A required agreement between the HMIS Lead Entity and the service provider before access to the LB HMIS is authorized.

Bitfocus: The vendor who developed Clarity Human Services used for the LB HMIS.

Business Associate Agreement (BAA): A BAA is a legal contract between the City of Long Beach and a healthcare or service provider that will receive access to, transmit, or store Protected Health Information (PHI) as part of its services for the LB CoC.

Clarity Human Services: A software package developed by Bitfocus which tracks data about people in housing crisis in order to determine individual needs and provide aggregate data for reporting and planning. This software is web-based and

uses a standard web browser to access the database. It adheres to HUD's HMIS programming standards and updates as needed to HUD's most current data standards.

LB CoC: City of Long Beach Continuum of Care

LB HMIS: City of Long Beach Homeless Management Information System, the specific HMIS utilized in the City of Long Beach is Clarity Human Services by Bitfocus.

CHO: Contributing HMIS Organization.

Comparable Database: A Comparable Database is an alternative system that victim service providers use to collect client-level data over time and to generate aggregate reports based on the data.

Continuum of Care Project: Project receiving funding from the US Department of Housing and Urban Development through the competitive Continuum of Care application process.

Database: An electronic system for organizing data so it can easily be searched and retrieved. Usually organized by fields and records.

DHHS: The Department of Health and Human Services, Homeless Services Bureau

Encryption: Translation of data from plain text to a complex code. Only those with the ability to unencrypt the encrypted data can read the data. Provides security.

Firewall: A method of controlling access to a private network, to provide security of data. Firewalls can use software, hardware, or a combination of both to control access.

HMIS Lead Agency: The HMIS Lead Agency is the eligible entity designated by the CoC, in accordance with the CoC Program Interim Rule, to manage the CoC's HMIS on the CoC's behalf.

HMIS System Administrator: The person with the highest level of user access in Clarity Human Services and whose job it is to manage the HMIS implementation at the local level: enrolling programs and managing appropriate use, supporting users through connection to, or direct provision of, user training, and overseeing system setup. The name of the level of access in Clarity Human Services is "System Administrator."

HIPAA: The Health Insurance Portability and Accountability Act of 1996 (HIPAA) is a federal law that required the creation of national standards to protect sensitive patient health information from being disclosed without the patient's consent or knowledge. Agencies participating in the LB HMIS must adhere to HIPAA compliance.

Long Beach HMIS Team (LB HMIS Team): The working team responsible for organizing and managing the Long Beach HMIS.

Looker: A data visualization tool that is embedded into Clarity or used as a stand-alone.

Partner Agency: Agencies receiving funding from the City of Long Beach.

Personally Identifiable Information (PII): Information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

Server: A computer on a network that manages resources for use by other computers in the network. For example, file server stores files that other computers (with appropriate permissions) can access. One file server can "serve" many files to many client computers. A database server stores a data file and performs database queries for client computers.

User License: In order to gain access to the LB HMIS, an individual must request an user license through the LB HMIS Team. User must be from a partner agency with an approved agency agreement already in place.

User Policy: An agreement with Bitfocus that allows an individual to use Clarity Human Services.

Victim Service Provider (VSP): HUD defines a victim service provider to mean a private nonprofit organization whose primary mission is to provide direct services to victims of domestic violence. This term includes permanent housing providers—including rapid re-housing, domestic violence programs (shelters and non-residential), domestic violence transitional housing programs, dual domestic violence and sexual assault programs, and related advocacy and supportive services programs.

1.4. Ownership

LB HMIS, and all data stored in LB HMIS, is the property of the LB CoC. The LB CoC has final control over the creation, maintenance, and security of the LB HMIS. To ensure the integrity and security of sensitive client confidential information and other data maintained in the database, the DHHS will require all CHOs to sign an Agency Participation Agreement ("Agreement") and a Business Associate Agreement ("BAA") prior to being given access to the LB HMIS. The Agreement and BAA includes terms regarding the confidentiality of client health information pursuant to federal regulations of the Health Insurance Portability and Accountability Act of 1996 (HIPAA),

duration of access, an acknowledgement of receipt of the Policies and Procedures Manual, and an agreement to abide by policies and procedures related to LB HMIS, including all security provisions contained therein. Violations of the BAA, including without limitation the failure to comply with the policies and procedures related to LB HMIS, may subject an agency to discipline and termination of access to the LB HMIS.

2. Roles and Responsibilities
2.1. Long Beach HMIS Team

Role: The role of the Long Beach HMIS Team is to organize and manage the LB HMIS.

Explanation: As the coordinating body for Long Beach HMIS, the Long Beach HMIS Team is responsible for all system-wide policies, procedures, communication and coordination. The LB HMIS Team is the primary contact with Bitfocus, and with its help, implements all necessary system-wide changes and updates.

Responsibilities: The LB HMIS Team is responsible for providing a uniform HMIS which yields the most consistent data for client management, agency reporting, and service planning.

Oversee contractual agreements with funders, participating agency and consultants in adherence with policies and practices of HMIS. Monitor compliance and periodically review control decisions. Communicate with participating organization leadership and other stakeholders regarding HMIS.

Mine the database to respond to the information needs of participating agency, community stakeholders and consumers.

Document work on the database and the development of reports/queries.

Provide technical assistance to participating agency on policies and procedures and system use.

Provide initial training and ongoing training for agency staff to continually increase capacity.

Provide user support and technical assistance.

Provide required document templates for agreements that will be used for local implementation of HMIS functions.

Manage data quality; generate and distribute policy as necessary to address system changes and updates.

Monitor agency participation including timeliness and completeness of entry.

Communicate any planned or unplanned interruption in service.

2.2. Quality, Data, and Performance Subcommittee

Role: Implement and continuously improve CLB HMIS and ensure the HMIS scope aligns with the requirements of HUD, CLB CoC Projects, and other stakeholder groups.

Explanation: The purpose of the Quality, Data, and Performance Subcommittee is to provide guidance and oversight of CoC performance requirements, HMIS implementation, including planning, software selection, implementation and administration of the database according to HUD's HMIS Data and Technical Standards. Active participation in this subcommittee is open for all agencies utilizing the LB HMIS.

Responsibilities: Review and, as necessary, make recommendations regarding the privacy, security, and data quality plans, as well as any other required HMIS policies and procedures. Assist the City of Long Beach to help ensure:

All Long Beach HMIS Participating Agencies are meeting performance requirement set forth by the Long Beach Continuum of Care.

All Long Beach HMIS Participating Agencies consistently participate in the Long Beach HMIS.

The Long Beach HMIS satisfies the requirements of all federal regulations and notices.

The City of Long Beach fulfills the obligations outlined in its Policies and Procedures.

Address any issue that has major implications for the HMIS, such as policy mandates from HUD or performance problems with the HMIS vendor.

2.3. Software Vendor (Bitfocus)

> **Role:** Design, develop, and implement the Long Beach HMIS and ensure it is administered in compliance with HUD standards.

Explanation: Bitfocus ensures that the Long Beach HMIS is to be widely available for CoC use, with limited unplanned downtime for maintenance. In the event of planned server downtime, agencies will be notified in advance to allow CHOs to plan accordingly.

> **Responsibilities:**
>
> Provide ongoing support to the HMIS Lead pertaining to needs of end-users to mine the database, generate reports and other end-user interface needs.
>
> Administer the product servers including web and database servers.
>
> Monitor functionality, speed and database backup procedures.
>
> Provide backup and recovery of internal and external networks.
>
> Maintain the system twenty-four hours a day, seven days a week.
>
> Communicate any planned or unplanned interruption of service to the System Administrators.
>
> The HMIS Software provides up-to-date HUD-required reports

2.4. Agency

> **Role:** Agencies are responsible for communicating needs and questions regarding HMIS directly to the Long Beach HMIS Team.

Explanation: Agencies communicate needs and questions directly to the Long Beach HMIS Team. The Long Beach HMIS Team reviews all questions and concerns and provides an initial response within 48 hours.

> **Responsibilities:**
>
> Agency Users communicate needs, issues and questions to their Agency Administrator. If the Agency Administrator is unable to resolve the issue, the Agency Administrator contacts the LB HMIS Team via email. The goal of the LB HMIS Team is to respond to CHO needs within 48 hours of the first contact.
>
> Notify DHHS of agency updates.
>
> Ensure that the participating agency obtains a unique user license for each user at the agency.
>
> Maintain the HUD required elements for each program.
>
> Ensure new users understand the policies and procedures and security and integrity of client information.
>
> Ensure that HMIS access is granted only to users that have received training and are authorized to use HMIS.
>
> Notify all users at their agency of interruptions in service.
>
> Assign a point of contact person to be the communication between users and HMIS Lead.
>
> Detecting and responding to violations of the policies and procedures or agency procedures.
>
> Ensure data are entered
>
> Ensure proper documentation for all clients entered into HMIS.

2.4.1. Agency Administrator

Role: Each Agency designates an Agency Administrator who the centralized contact for the HMIS staff. The Agency Administrator acts as the operating manager and liaison for the HMIS system, serves as the primary contact between end users and the HMIS System Administrator, and acts as the first tier of support for HMIS end users.

Explanation: The Agency Administrator is the primary HMIS contact at the agency. This person is responsible for:

Providing a single point of communication between the CHO's end users and the System Administrator around LB HMIS issues

Ensuring the stability of the agency connection to the Internet and Clarity Human Services, either directly or in communication with other technical professionals

Providing support for the generation of agency reports

Managing agency user licenses

Monitoring compliance with standards of client confidentiality and data collection, entry, and retrieval

Participating as the advisors and consultants to the System Administrator

Designating one primary contact at each agency increases the effectiveness of communication between the agency and the LB HMIS Team.

Responsibilities:

Each Agency designates its Agency Administrator and sends that person's name and contact information to the HMIS System Administrator. Changes to that information should be promptly reported to the HMIS System Administrator.

Ensure the HMIS Privacy Notice is posted in a visible area of the Agency and is communicated in a language understandable by clients.

Enforce data collection, entry, and quality standards of all staff.

Ensure that end-users are using the correct HMIS-related forms and are following the most current HMIS procedures and workflow.

Monitor compliance with standards of confidentiality and data collection, entry, and retrieval.

Attend all HMIS-required meetings and conference calls.

2.4.2. HMIS User

> **Role:** HMIS Users, or individual who uses or enters data in an the CLB HMIS, must take appropriate measures to prevent unauthorized data disclosure. All HMIS Users are authorized an appropriate level of access to HMIS data.

Explanation: HMIS Users have an obligation to collect and manage sensitive and protected personal data in a manner that is secure and maintains privacy. Clarity Human Services allows multiple levels of user access to data contained in the database. Access is assigned when new users are added to the system and can be altered as needs change. For security purposes, appropriate access levels should be assigned to all users.

> **Responsibilities:**
>
> Input accurate and timely data for all clients.
>
> Report any security violations.
>
> Comply with relevant policies and procedures
>
> Inform clients about the benefit of HMIS and the ability to assist client with streamline services.
>
> Assume responsibility for any actions undertaken with their usernames and passwords.
>
> Ensure system access is applied with the highest level of security.

3. Standard Operations
   3.1. Access to LB HMIS
    3.1.1. Agreements

> **Policy:** The Executive Director (or other empowered officer) of any agency wishing to connect to CLB HMIS must first sign the CLB HMIS Agency Participation Agreement ("Agreement) before any member of that agency is granted access. During the subcontracting process, agencies are also required to sign a Business Associate Agreement ("BAA") to ensure the integrity of protected health information and HIPAA compliance.

Explanation: Only agencies that have agreed to the terms set out in the Agreement and corresponding BAA are allowed access to the LB HMIS. The Agreement includes privacy and confidentiality standards, database integrity guidelines, reporting expectations, and an agreement to abide by all provisions contained therein.

> **Procedure:** Agencies are given a copy of the CLB HMIS Agency Agreement, Policies and Procedures Manual, HMIS Data Quality Plan, Security Plan, and Privacy Practices and any other relevant paperwork for review. Once that paperwork has been reviewed and the Agreement signed, agency users will be scheduled for Clarity Human Services training. Once training has been completed, each user is issued a username and password. Signing of the Agreement is a precursor to training and user access.

3.1.2. User Licenses Standard

Policy: Each Project funded or contributing to the Long Beach Housing Inventory Chart (HIC) by the DHHS is allocated a maximum of three (3) HMIS user licenses and 1 Looker license. Project must have an assigned HMIS user license to allocate the Looker license. Each Project is required to assign at least one (1) user license and (1) Looker license. Project user license allocations cannot be transferred to another project. The agency must have at least one (1) Agency Administrator. The Agency Administrator must have a HMIS User License and a Looker License. The agency is required to assign users to a primary project. The users must enter data for the projects and/or manage the project. The agency can add additional projects to user once a primary project has been selected.

Explanation: As projects grow and the number of LB HMIS users increases, CHOs may need to purchase additional User licenses. This purchase can be made at any time by contacting the LB HMIS Team.

Procedure: Agency interested in adding user licenses and/or Looker licenses must submit a completed HMIS User License Request Form. All user licenses above the maximum allocation per project will be invoiced to the agency. The addition of user and/or purchase of license are at the discretion of DHHS. The HMIS User Setup Fee(s) is required for all new licenses and is not prorated. HMIS User License(s) and/or Looker License(s) purchased after start of HMIS project operational period will be prorated. All purchases of user license(s) are final. The CLB will not reimburse the HMIS User Setup Fee(s), HMIS User License(s) and Looker License(s). User License(s) and Looker License(s) can be reassigned to another user within the project by completing HMIS User License Request Form. User Deletion Form must be submitted for user who no longer need access to HMIS and/or is no longer with the agency. Annual user licenses renewal process:

The user license renewal form will be sent to agency.

The user license renewal form must be submitted to DHHS within 15 days of receipt date.

The user license renewal invoice will be sent to agency.

The annual license renewal is payable within 15 days following the date of the renewal invoice.

The renewal will cover the subsequent HMIS project year corresponding to the HMIS operation year.

Agency may choose to relinquish purchased user license during the renewal period. Agency will check the Relinquish checkbox in the user license renewal form and sign confirming relinquishment of user license. DHHS can renew the relinquished user license and store for future DHHS allocation requirement.

LBDHHS reserves the rights to allow additional licenses at no cost and will notify agencies with minimum of 30 days notice if and when fees for the additional licenses would commence.

3.1.3. Affiliated Agency

Policy: Affiliated Agency and/or projects not funded by the CLB CoC can participate in CLB HMIS with the approval of the DHHS. Prior to participation the agency must have a signed agreement. Affiliated Agency and/or projects are responsible for cost related to HMIS participation.

Explanation: Although agencies not funded by the LB CoC, HMIS participation is encouraged and beneficial to the agency. HMIS participation improves coordination of care and services, improves knowledge about services and bed availability, and reduces duplication of information.

Procedure: Affiliated agencies are given a copy of the CLB HMIS Agency Agreement, Policies and Procedures Manual, HMIS Data Quality Plan, Security Plan, and Privacy Practices and any other relevant paperwork for review. Once that paperwork has been reviewed and the Agreement signed, agency users will be scheduled for Clarity Human Services training. Once training has been completed, each user is issued a username and password. Signing of the Agreement is a precursor to training and user access.

3.1.4. Victim Service Providers and Comparable Databases

Policy: Victim Service Providers are prohibited from entering client-level data into the CLB HMIS under standard privacy and security standards. Regardless if the information has been encoded, encrypted, hashed or otherwise protected without informed, written, reasonably time-limited consent. Under no circumstances can the personally identifying information data be shared. Victim Service Providers may share non-personally identifying data in aggregate form and non-personally identifying demographic information to comply with Federal, State, tribal, or territorial reporting, evaluation, or data collection requirements.

Explanation: A Victim Service Provider (VSP) is defined as a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. A VSP is a designation at the agency level, not the project level. The Violence Against Women Act (VAWA) prohibit VSPs from entering a person's identifiable information into HMIS. Instead, a VSP is required to collecting Personal Identifying Information (PII) and other HUD-required data in a relational database that is comparable to HMIS, referred to as a comparable database. In addition, providers that receive funds from the Office of Violence Against Women (OVW) programs, Office for Victims of Crime (OVC) programs, or Family Violence Prevention and Services Act (FVPSA) for agency-wide or for agency administrative purposes must also use a comparable database.

Procedure:
Comparable Databases MUST have the following characteristics:
  Victim Service Providers controls who can access and see client information
  Access to the database is controlled by the Victim Service Provider
  Meets the standards for security, data quality and privacy of the HMIS
  Complies with all HUD-required technical specifications
  Be programmed to current HMIS Data Standards
  Has the functionality to de-duplicate client records within each system
  Be able to generate all reports required by Federal Partners
  Data fields must be able to be modified and customized

3.2. User Accounts
3.2.1. LB HMIS License Invoicing

Policy: The CLB invoices each agency for each new license at the time of purchase and CLB invoices the applicable annual CLB HMIS license support fees at the start of each fiscal year.

Explanation: The HMIS service provider charges a one-time purchase fee for each license due at time of purchase and an annual support fee for each license purchased to the LB.

Procedure: The Long Beach HMIS Team calculates and submits to the Homeless Services Bureau the total amount to be invoiced to each agency for applicable license support fees at the beginning of each fiscal year. The applicable fees are re-examined in May of each year. When an agency purchases a new license, Long Beach HMIS Team submits to the Homeless Services Bureau the total of the one-time purchase price to be invoiced to the agency immediately. Long Beach HMIS Team issues the new license upon receipt of payment from the agency.

3.2.2. User Activation

Policy: Each new user is issued a username and password to access the CLB HMIS upon completion of Clarity Human Services training and signing of the CLB HMIS User Agreement.

Explanation: Agencies determine which of their employees have access to LB HMIS. Every user must receive appropriate Clarity Human Services training before being issued a username and password.

Procedure: Agency Administrators decide who receives access to the CLB HMIS. The CLB HMIS System Administrator is responsible for training new users and Agency Administrators will supplement this training as necessary. Users are responsible to keep their user accounts active. If the user is inactive, as defined by no login for 30 days, the user will receive a warning to login within 7 days. If within 7 days the user has not logged in, the license will be inactivated.

3.2.3. Access Termination

> **Policy:** The agency is required to notify the LB HMIS Team via email within 3 business days when the user is no longer operating the project or no longer employed by the agency.

Explanation: LB HMIS retains ownership rights of all LB HMIS user licenses if a program terminates or is otherwise discontinued from LB HMIS participation or when an Agency decides to reduce their number of LB HMIS licenses.

> **Procedure:** The agency will notify the CLB HMIS Team within 3 business days of when the user is no longer operating within the project or no longer employed by the agency. The account will be inactivated until the agency notifies the System Administrator of the replacement. The CLB HMIS Team is required to delete user license within 3 business days of notification from the Agency.

3.2.4. LB HMIS User License Ownership

> **Policy:** The DHHS maintains ownership of user licenses when a program terminates or discontinues use of the CLB HMIS or when Agency decide to reduce their number of CLB HMIS licenses. Licenses are redistributed yearly, through a CLB HMIS directed process.

Explanation: LB HMIS retains ownership rights of all LB HMIS user licenses if a program terminates or is otherwise discontinued from LB HMIS participation or when an Agency decides to reduce their number of LB HMIS licenses.

> **Procedure:** When a program discontinues CLB HMIS participation or wishes to reduce their number of CLB HMIS users/licenses the System Administrator deletes all user accounts affected and all licenses become eligible for termination or redistribution. The System Administrator is responsible for managing the allocation of all user licenses within CLB HMIS.

3.3. Project Changes

> **Policy:** The Agency Administrator notifies the CLB HMIS Team of programmatic changes that may impact the collection, entry, quality, or reporting of project data in HMIS.

Explanation: Agencies must notify the LB HMIS Team of any program changes which affect data collection, data entry, data quality and/or data reporting. Agency Administrators communicate in writing any change in the following (but not limited to) funding status, program type, program start and end date, bed capacity, etc.

> **Procedure:**
>
> The Agency Administrator notifies the CLB HMIS Team of any applicable programmatic changes to existing programs which may influence data collection, data entry, data quality or data reporting (i.e., program expansion of capacity or scope; termination; deactivation; discontinuance of CLB HMIS participation, etc.). Notification is made in writing at least 45 business days before the proposed implementation date of the change.
>
> The System Administrator will communicate the change with the DHHS Leadership team for review & comment.
>
> Any needed recommendations and/or timeline for assistance are returned to the agency no fewer than 10 business days prior to the requested implementation date.
>
> The System Administrator assists with changes within CLB HMIS as necessary.
>
> While the Agency Administrators have the access to make changes to programs within the system, it is required that any changes first be reviewed with the System Administrator to determine the overall effect of the changes and to allow for documentation of changes as well as the arrangement of any necessary support.

3.4 CHO Hardware/Software Requirements

> **Policy:** Agencies are required to provide their own computer and method of connecting to Internet to access and utilize the CLB HMIS.

Explanation: Because Clarity Human Services is a web-enabled software, all that is required to use the database is a computer, a valid username and password, and the ability to connect to the Internet by broadband or other high-speed connection. There is no unusual hardware or additional Clarity Human Services-related software or software installation required.

Bitfocus guidelines are:

Workstation Requirements: Clarity Human Services relies on the client machine more than previous versions. Therefore, faster machines will have better results, where in the past most of the performance was related to the server and connection speed. Fast internet connection and browser speed are still important.

Memory: 4 Gig recommended, (2 Gig minimum)

Monitor: Screen Display - 1024 by 768 (XGA) or higher (1280x768 strongly advised)

Processor: Dual-Core Processor

Internet Connection: Broadband or other high-speed option

Browser: Google Chrome (recommended), Mozilla Firefox, Microsoft Internet Explorer, Apple Safari

Virus Protection with auto update

Firewall Security

Accessories: Scanner for attachments

> **Procedure:** It is the responsibility of Agencies to provide a computer and connection to the Internet. If desired by the CHO, the LB HMIS Team will provide advice as to the type of computer and connection.

3.5 Training

Policy: The CLB HMIS team provides adequate and timely training on a regular basis.

Explanation: The LB HMIS team provides training on accessing and entering information in the Clarity Human Services software. Training will be required for all new users prior to initial access into the HMIS.

Procedure: The CLB HMIS Team provides training to all users. User training covers the following:

User Agreements

Description and benefits of the HMIS

HMIS Participating Agency

HMIS Access Requirements

Ethics, Security, Privacy Practices and Client Confidentiality

Client Consent to Release of Information Procedure

HMIS Data Collection Requirement

Data Quality

Performance Requirements

Client Grievance Procedure

HMIS Policy and Procedure

System Updates Training

3.6 System Availability

> **Policy:** The CLB HMIS and Clarity Human Services provides a highly available database server and informs users in advance of any planned interruption in service.

Explanation: It is the intent of the LB that the LB HMIS server will be available 24 hours a day, 7 days a week, 52 weeks a year to incoming connections. However, no computer system achieves 100% uptime. In the event of planned server downtime, the System Administrator will inform agencies at least 48 hours in advance to allow Agencies to plan accordingly.

> **Procedure:** If the database server is or will be unavailable due to disaster or routine maintenance, the System Administrator contacts Agency Administrators and informs them of the cause and duration of the interruption in service.

3.7 Technical Support

> **Policy:** The CLB HMIS Team will provide user support and technical assistance during normal business hours, except during holidays observed by the City of Long Beach. Agencies are responsible for providing their own technical support for all hardware and software employed to connect to the LB HMIS.

Explanation: The equipment used to connect to the LB HMIS is the responsibility of the Agency/Provider. Technical assistance and user support will be available by the LB HMIS Team.

> **Procedure:** Agencies provide internal technical support for the hardware, software and internet connections necessary to connect to the CLB HMIS according to their own organizational needs. The CLB HMIS Team will provide support regarding navigating and accessing the Clarity Human Services site.

3.8 Data
3.8.1 Data Quality

Policy: Agencies collect and enter into CLB HMIS a required set of data variables for each client as defined in the HUD HMIS Data Standards. HMIS users only collect client data relevant to the delivery of services to people experiencing homelessness in Long Beach

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Explanation: HUD establishes HMIS data standards to allow for standardized data collection on homeless individuals and families across systems. Documentation of requirements for the programming and use of all HMIS and comparable database systems are specified in the Interactive HMIS Data Standards Tool, the HMIS Data Dictionary, and the HMIS Data Standards Manual. Required data elements are outlined in the federal guidance. Agencies may choose to collect and enter more client information for their own case management and planning. purposes as is permissible under applicable law. The purpose of LB HMIS is to support the delivery of homeless services in the City of Long Beach. The database should not be used to collect or track information unrelated to people experiencing homelessness and the delivery of homeless services.

Procedure:

All participating agencies must become and remain familiar with the data fields required to be collected and entered into the LB HMIS.

Agencies are encouraged to collect and enter live data.

Agencies electing not to enter live data are required to document the collection of live client data. Data not entered live must be entered within 6 days.

Data entry must be completed prior to the end of the operational period.

Data is required to be routinely reviewed in the HMIS for completeness and data accuracy.

Program entry and exit dates are required in HMIS and are critical to accuracy of reporting performance. To meet specific program design and population served by project, it is recommended that Agencies develop a specialized entry and exit plan to meet performance objectives.

CLB HMIS will provide required documents and may provide templates to be used for local implementation of HMIS functions.

3.8.2. Personal Data Collection and Privacy Protection

> **Policy:** CLB HMIS and participating agencies ensure that all required client data will be captured in the CLB HMIS while maintaining the confidentiality and security of the data in conformity with all current regulations related to the client's rights for privacy and data confidentiality. All personally identifiable information entered in HMIS and comparable databases are required to adhere to HIPAA compliance.

Explanation: Clients have the right to expect provider agencies to collect and manage their protected personal data in a manner that is secure and maintains their privacy. Clients have the right to know why agencies are electronically collecting their information and how it will be used.

> **Procedure:** The Agency must have the CLB HMIS privacy notice posted at each intake desk. The sign is posted in an area accessible and easily viewed by clients.
>
> The Agency must provide a copy of the HMIS Privacy Notice to each client, as requested. Agencies will provide a verbal explanation of the HMIS and arrange for a qualified interpreter/translator if an individual is not literate in English or has difficulty understanding the Privacy Notice or associated Consent Form(s).
>
> The Agency will not solicit or enter information from clients into the HMIS database unless it is essential to provide services or conduct evaluation or research.
>
> The Agency will not divulge any confidential information received from the HMIS to any organization or individual without informed consent by the client, unless otherwise permitted by applicable regulations or laws.
>
> The Agency will ensure that all licensed staff who are issued a User Identification and Password to the HMIS will:
>
> Abide by this Participation Agreement including all associated confidentiality provisions.
>
> Be responsible for oversight of agency specific confidentiality requirements.
>
> Ensure that users have on file a signed User Agreement, which outlines their individual agreement to responsibly uphold client confidentiality.
>
> The Agency acknowledges that ensuring the confidentiality, security and privacy of any information inputted and utilized from the system by the Agency is strictly the responsibility of the Agency.
>
> The Agency agrees to enforce standards as stated within the User Agreement for all users employed by the agency.

3.8.3. Electronic Record Documentation

> **Policy:** HUD does not require the maintenance of documentation in both paper and HMIS electronic record.

Explanation: Documents deemed necessary for service delivery may also be attached to the HMIS to the extent that the documents provide additional information for the coordination of needed services.

> **Procedure:** Non-essential documentation must maintain all supporting documentation not entered or uploaded into the HMIS database to ensure that HMIS records meet HUD standards of completeness and sufficiency. Agency that is paperless must maintain the level of documentation that is comparable to paper file. Information protected by the HIPAA shall not be attached to the HMIS electronic client record. It is recommended that these documents be kept in a separate file as required by each CoC agency

3.8.4. Data Retention

> **Policy:** Client Personal Identifiable Information (PII) stored on any digital medium is purged, if no longer in use, 7 years after the data was created or last changed (unless a statutory, regulatory, contractual or other requirement mandates longer retention).

Explanation: PII that is no longer needed must be removed in such a way as to reliably ensure the data cannot be retrieved by unauthorized persons.

> **Procedure:** Every three years digital files where PII is stored are reviewed and client PII that is no longer needed is deleted or otherwise removed in such a way as to reliably ensure the data cannot be restored.

3.8.5. Data Sharing

> **Policy:** The DHHS and the Participating Agency will comply with all applicable federal and state laws, city ordinance regarding the sharing, and protection of client data.

Explanation: The DHHS promotes a coordinated assessment, intake and referral process to better service our clients. When possible, the DHHS furthers this effort by allowing agencies to share information through an HMIS Agency Participation Agreement and/or MOU.

> **Procedure:** The Participating Agency acknowledges that in transmitting, receiving, storing, processing or otherwise dealing with any client protected information, they are fully bound by federal and state regulations governing confidentiality of patient records where applicable, 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 law.
>
> The Participating Agency acknowledges that they are prohibited from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted 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). A general authorization for the release of information is not sufficient for this purpose.
>
> The Participating Agency agrees to notify the LB HMIS Team, within one business day of any breach, use, or disclosure of the protected information not provided for by this agreement.
>
> The Participating Agency agrees to complete the Release of Information for any client, prior to sharing client data into HMIS.
>
> The Participating Agency acknowledges that the Participating Agency, itself, bears primary responsibility for oversight for all sharing of data is has collected and entered into HMIS.
>
> The Participating Agency acknowledges that the client has the right to have their data entered anonymously and/or refuse to answer any questions, including any questions regarding their mental health history or medical conditions and client cannot be denied services.
>
> Any data sharing for research on the nature and patterns of homelessness that uses client-level HMIS data will take place only based on specific agreements between researchers and the DHHS. These agreements must reflect adequate standards for the protection of confidentiality of data and must comply with the disclosure provisions of the Section 4 of the 2004 HMIS Technical Standards Final Notice.

3.8.6. Scanned Attachment Requirement

> **Policy:** In addition to the timely and accurate completion of data collection required for reporting purposes, supplemental documents shall be attached to the HMIS record. It is the responsibility of every agency user to ensure the required documents are attached to the HMIS.

Explanation: The LB HMIS requires that essential client documentation be scanned and uploaded to LB HMIS. LB HMIS should be tool to case managers helping clients exit quickly from emergency shelters into stable housing. Client documentation is available quickly, avoiding delays in client services.

> **Procedure:** CLB HMIS seeks to provide a uniform data system which yields the most consistent data for client management, agency reporting, and service planning. Agencies agree to attach all required attachment in HMIS. To this end, the CLB HMIS mandates the following attachments for enrolled clients are:
>
> Release of Information
>
> Homeless Eligibility and Certification
>
> Picture Identification
>
> Social Security Card
>
> Birth Certificates
>
> Income Documentation
>
> Non-Cash Documentation
>
> Housing Voucher
>
> DD214 (Veteran Only)

3.9. Client Consent to Share Protected Personal Information

> **Policy:** Participating agency shall enter all client who is receiving services into HMIS. Participating Agencies is required to obtain client consent prior to sharing client information with other Agency in the system. Client consent must be documented on the Client Consent to Share Protected Personal Information Form.

Explanation: Participating Agencies acknowledges that client consent is required before sharing client information with other Agency in the system. Client consent must be documented on the Client Consent to Share Protected Personal Information Form.

> **Procedure:** The Consent for Release of Information to share client data must be within or obtained from the HMIS. Restricted information, including progress notes and counseling notes, about the diagnosis, treatment, or referrals related to a mental health disorder, drug or alcohol disorder, HIV/AIDS, and domestic violence concerns shall not be shared with other participating Agency without the client's data sharing consent.
>
> Agencies acknowledges that the Agency, itself, bears primary responsibility for oversight for all sharing of data it has collected via the HMIS and attached signed consent to share.
>
> Agencies agree to place all files not required in HMIS at the agency's program site and that such file will be made available to the DHHS for periodic audits. The agency will retain these HMIS-related forms for a period of 7 years, after which time the forms will be discarded in a manner that ensures client confidentiality is not compromised.
>
> The Agency acknowledges that clients who choose not to authorize sharing of information cannot be denied services for which they would otherwise be eligible. For clients who decline consent to participate in HMIS, the Agency must lock the client's file in HMIS and have the client sign the Consent Authorizing Release and Sharing of Information in order to share client information among another Agency without using HMIS.
>
> The agency must renew the Client Consent to Share Protected Personal Information that is expired. Records that have expired consent the CLB CoC reserve the right to reference or use the historical information for viewing service delivered and/or reporting.
>
> The Agency will ensure that all Client Consent to Share Protected Personal Information forms are renewed every 7 years and agency shall verify prior to each project enrollment. Each agency is responsible to ensure appropriate consent to share is signed and attached.
>
> DHHS will review and provide feedback on all forms to ensure the Agency's feedback is in compliance with the laws, rules and regulations that govern its organization through participation with the Quality, Data, and Performance Subcommittee.

3.10. Client Grievance

Policy: Clients should seek a remedy from the Agency with which they have a grievance. Agency shall report all HMIS-related client grievances to the CLB HMIS Team.

Explanation: Each agency is responsible for answering questions and complaints from their own clients regarding HMIS. The LB HMIS Team is responsible for the overall use of HMIS and will respond if users or agencies fail to follow the terms of the HMIS Agreements, breach client confidentiality, or misuse client data. Agencies are obligated to report all HMIS-related client problems and complaints to the LB HMIS Team, which will determine the need for further action.

Procedure: All grievances must adhere to the grievance process defined in the Long Beach Coordinated Entry System Policies and Procedures.

All HMIS grievances should be brought immediately to the attention of the primary case manager for first-level resolution.

If the case manager cannot resolve the grievance client will be referred to the supervisor of that agency.

If the result is not to client satisfaction client may then complete a grievance form and submit to the Homeless Services Bureau.

Assistance with completing the form will be given upon request.

Client will then work with the Homeless Services Bureau to discuss concerns and agreeable outcomes.

If client is not willing to pursue the complaint in writing, substantiate any information, or provide necessary details to perform a proper investigation, it may be decided to file the complaint with no further follow up taken.

Staffs who utilize the HMIS shall not discriminate in the provision of services to anyone based on race, religion, nationality, gender, age, disability or sexual orientation in accordance with requirements of City, State and Federal laws. Participants who decline to participate in the HMIS cannot be denied services.

Clients are encouraged to submit a grievance form once first-level resolution has been attempted and are not satisfied with the outcome. Client grievances will be addressed by the Long Beach Homeless Services Bureau as soon as possible, and within five (5) business days.

3.11. LB HMIS Team Access

Policy: The CLB HMIS Team has access to retrieve all data in CLB HMIS. The CLB HMIS Team does not access individual client data for purposes other than direct client service-related activities, reporting, maintenance, and checking for data integrity.

Explanation: The LB HMIS Team has access to all data in the database. No other agency staff shall have universal access to client-level data. The LB HMIS Team protects client confidentiality in all reporting.

Procedure: Each member of the CLB HMIS Team responsible for ensuring that no individual client data is retrieved for purposes other than direct client service, reporting, maintenance, and performing data integrity checks. The HMIS System Administrator will oversee all reporting for the LB HMIS.

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