IDAHO BALANCE OF STATE CONTINUUM OF CARE

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

Policies and Procedures

Updated May 2019
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HMIS Overview

A Homeless Management Information System (HMIS) is a locally administered information system used to record and analyze client, service and housing data for individuals and families who are experiencing or at risk of homelessness. The power of the HMIS is its capacity to integrate and unduplicate data across all homeless assistance and homelessness prevention projects within a community who contribute data in HMIS.

HMIS grew out of local efforts to manage homelessness services data and client information. Recognizing the importance of those efforts, in 2001 Congress directed HUD on the need for data and analysis on the extent of homelessness and the effectiveness of the McKinney-Vento Act Programs including: developing unduplicated counts of clients served at the local level, analyzing patterns of use of people entering and exiting the homeless assistance system, and evaluating the effectiveness of those systems.

HMIS continued to develop in response to that directive and the implementation in of HMIS in Idaho began in 2002 after IHFA received a grant from HUD. The HEARTH Act, passed in 2009 and amending the McKinney-Vento Act, required HMIS participation for recipients and subrecipients of CoC Program and Emergency Solutions Grants (ESG) funds. Each Continuum of Care became responsible for designating an HMIS that complies with the requirements of the Data and Technical Standards Final Notice (Federal Register Vol. 69 No. 146).

To meet the goal of ending homelessness a community must have a better understanding of the characteristics of those who are experiencing homelessness as well as what is working in the community and what is not. HMIS produces reliable aggregate data at multiple levels that contribute to that understanding: project, system, local, state and national. HMIS is used to measure project performance and participate in benchmarking of the national effort to end homelessness. Solid data enables a community to work confidently towards their goals as they measure outputs, outcomes, and impacts.

In 2010 the U.S. Interagency Council on Homelessness (USICH) affirmed HMIS as the official method of measuring outcomes in its Opening Doors: Federal Strategic Plan to Prevent and End Homelessness. HMIS is administered by U.S. Department of Housing and Urban Development (HUD), through the Office of Special Needs Assistance Programs (SNAPS). It is used by many Federal Partners that target services to persons experiencing homelessness within HUD, the Department of Health and Human Services (HHS), and the U.S. Department of Veteran’s Affairs (VA):

- U.S. Department of Housing and Urban Development (HUD)
  - Office of Special Needs Assistance Programs (SNAPS)
  - Continuum of Care (CoC) Program
  - Emergency Solutions Grant (ESG) Program
  - Housing Opportunities for Persons with AIDS program (HOPWA)
  - HUD-Veterans Affairs Supportive Housing (HUD/VASH)
  - Rural Housing Stability Assistance Programs (RHSP)
- U.S. Department of Health and Human Services (HHS)
  - Administration for Children and Families (ACYF) – Family and Youth Service Bureau (FYSB)
The HMIS Federal Partners worked collaboratively to develop HMIS Data Standards. The purpose of data quality standards is to standardize expectations and provide guidance to HMIS participating programs to ensure sufficient data on clients, their demographic, characteristics and services, facilitate confident reporting on the extent and characteristics of homelessness, and provide communities with baseline data collection requirements. HUD has worked with program staff of the federal partners to align the data elements required for each program funding source and determine how and when data is to be collected. Communities may choose to incorporate additional data elements they may find useful for local or state purposes.

The Idaho Balance of State Continuum of Care (BoS CoC) has instituted the use of HMIS in response to the requirements of the United States Congress under the HUD Appropriations Act HR-2620, the HEARTH Act, the CoC Programs interim rule 24 CFR 578 and as directed by HUD. Idaho Housing and Finance (IHFA) administers HMIS for the Idaho BoS CoC.

Section 1: Privacy and Confidentiality

HMIS Privacy and Confidentiality refers to the treatment of the information entered into the HMIS and how it is disclosed, shared, protected, and used by the entities that have access to the data.

A Service Provider is any agency that participates in HMIS. For all information entered in the HMIS, Service Providers and Users are bound by all applicable federal and state confidentiality regulations and laws that protect Client records that will be accessed or entered into the HMIS system.

Privacy and Confidentiality Policy

IHFA and Service Providers shall follow, comply with and enforce all of the privacy and confidentiality requirements as outlined in the Service Provider Contract. Users shall follow, comply with and enforce the User Agreement. Service Providers and Users will abide by the Confidentiality and Privacy Requirements outlined below.

Any requests for release of HMIS information, including court orders and subpoenas, shall be referred to IHFA. The Service Provider agrees not to release any confidential information received from the HMIS database to any organization or individual.
**Technical Standards- Confidentiality and Privacy Requirements**

The Service Provider and IHFA agree to be bound by all applicable federal and state confidentiality regulations and laws that protect Client records that will be placed on the Idaho HMIS. Upon entry of Client confidential information into the HMIS, neither IHFA nor Service Provider shall disclose any confidential information of any Client, unless authorized by Client, required under law or by court order, or if disclosed in such a way as to remove all identifying information from the presentation of such information. Such restriction on use of confidential Client information shall not limit the preparation of reports by IHFA or the CoC System Administrator for its use or for the use of HUD, provided such reports do not contain any confidential information regarding any Client unless consented to by the Client.

A Service Provider may adopt additional substantive and procedural privacy protections that exceed the requirements listed in the HMIS Policy and Procedures as long as all additional protections and procedures are included in its privacy notice. Employees, volunteers, affiliates, contractors and associates are covered by the privacy standards of the Service Provider they deal with.

**Confidentiality Requirements**

If a Service Provider is a HIPAA covered agency, they must abide by HIPAA regulations. HIPAA Privacy Rules take precedence over HMIS privacy standards. Rules for Domestic Violence Shelters and Service Providers take precedence over HMIS privacy standards and data entry requirements.

The Idaho HMIS system maintains a common database which allows for the sharing of information. Some of the data HMIS collects is considered **Protected Personal Information (PPI)**. Protected Personal Information is defined as:

> Any information maintained by a Service Provider that can be used to identify a particular individual. This includes without limitation a Client’s name, Social Security Number, Date of Birth, and such personal identifying information that identifies directly, indirectly, by linking with other identifying information to identify a specific individual, or can be manipulated by a reasonably foreseeable method to identify an individual.

Personal Protected Information (PPI) will not be disclosed to any State or Federal Agency except as required by law or to avoid a serious threat to health or safety.

Unauthorized disclosure of PPI may be grounds for legal action.

**Procedures**

- The Service Provider is responsible for ensuring that all staff, volunteers and other persons in their organization using or accessing information from HMIS receive confidentiality training to include HMIS use and all applicable confidentiality laws.

- The Service Provider and Users shall utilize the **IHFA HMIS Privacy Notice and Release of Authorization (ROI)** form for all clients. This form is required to be given to all adult clients for notification of the agency’s use of HMIS and collection of data. The form describes how the data will or will not be used, the clients right to a printed copy of the data contained in the HMIS and grievance procedure if they believe their privacy rights have been violated. This form also allows the client to authorize or deny the sharing of their protected personal information.
• The Service Provider and Users shall provide a verbal explanation of the HMIS database and the terms of consent to the Client, including an explanation of how the information will be used, how it will be provided, and the advantages of providing accurate information.

• The Service Provider shall maintain Client Privacy Notice and Release of Information documentation.

• The Service Providers and Users shall diligently record and take appropriate actions, in the HMIS system, to record all restrictions requested by the Client.

• If a Client withdraws consent for release of information, the Service Provider/ User remains responsible to ensure that Client’s information is restricted.

• Referenced documents are available on IHFA’s website at https://www.idahohousing.com/homelessness-services-programs/hmis/.

Privacy Requirements

The Privacy Standards apply to all Service Providers, HMIS Users, CoC System Administrators, and HMIS Lead. All organizations and users that have access to HMIS data must comply with the privacy requirements listed below with respect to; data collection limitations; data quality; purpose and use limitations; openness; access and correction; and accountability. Privacy refers to the safeguarding of PPI in the Idaho HMIS from open view, sharing or inappropriate use.

Procedures

• The Service Provider will use the Idaho HMIS Privacy Notice which describes the purpose for which it collects the PPI, its policies and practices for the processing of PPI, and all the uses and disclosures.

• The Service Provider must post the Idaho HMIS Privacy Notice at each intake desk (or comparable location) that explains generally the reasons for collecting this information.

• The Service Provider must post a sign stating the availability of the privacy notice to any individual who requests a copy.

• The Service Provider must allow an individual to inspect and to have a copy of any PPI about the individual.

• The Service Provider must offer to explain any information that the individual does not understand.

• The Service Provider must consider any request by an individual for correction of inaccurate or incomplete PPI pertaining to the individual. The Service Provider is not required to remove such information but they may mark such information as inaccurate or incomplete or supplement such information.

• The Service Provider must establish a method, such as an internal audit, for regularly reviewing compliance with the privacy notice. The Service Provider must maintain permanent documentation of all privacy notice amendments.
• The Service Provider must establish an internal or external appeal process for hearing an appeal of a privacy complaint or an appeal of denial of access or correction rights.

• If the Service Provider maintains a public web page, the Service Provider must post the current version of the privacy notice on its web page.

• The Service Provider must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to sign (annually or otherwise) a confidentiality agreement that acknowledges receipt of a copy of the privacy notice and that pledges to comply with the privacy notice.

• The Service Provider must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to undergo (annually or otherwise) formal training in privacy requirements.

• The Service Provider must secure any paper or other hard copy containing PPI that is either generated by or for HMIS, including, but not limited to reports, data entry forms and signed consent forms.

• Referenced documents are available on IHFA’s web site at https://www.idahohousing.com/homelessness-servicesPrograms/hmis/.

Data Sharing Policy
The Idaho BoS CoC HMIS implementation is by default a closed system. No client data entered into the HMIS database will be shared with any other Service Provider or HMIS users outside of the Service Provider providing service, with the exception of the HMIS Lead, without the express written consent of the client. Client information can only be shared among Service Providers by express written consent of the client using the HMIS Client Privacy Notice and Release of Information Authorization Form. There are certain Service Providers and projects where no data sharing is allowed.

Procedures
• Clients can revoke the sharing of data at any time by indicating their desire to revoke in writing. The written revocation shall be kept in the client’s physical file.

• Sharing of HMIS data among Service Providers is encouraged but not required.

Monitoring Policy
Service Providers who receive federal funding are required to use HMIS and are subject to system audits.

Service Providers and sub-recipients receiving funding through IHFA, as well as Service Providers that are not funded by any federal partner but are entering data as part of the CoC’s HMIS implementation may be subject to system audits. Federal funding may be withheld by IHFA at its discretion, where applicable, until the Service Provider has demonstrated acceptable levels of participation.
End users, case managers and executive directors review the HMIS Data Standards packet and sign the acknowledgment annually.

**Procedures**

- The HMIS Lead will conduct annual onsite monitoring and the Service Provider will be subjected to monitoring on HMIS Policy and Procedures, Standards Plans, reporting and federal, state and local regulations and laws that protect client records.

- The HMIS Lead will conduct periodic off-site monitoring of Service Provider HMIS data entries, including but not limited to data completeness, data accuracy, ROI accuracy and security settings and other areas that the HMIS Lead determines necessary to ensure the security and confidentiality of Client information. The HMIS Lead will contact Service Providers with necessary information allowing the Service Provider to make corrections to the Service Provider’s Client entries.

- Any equipment purchased for the Service Provider using HMIS scholarship funds is subject to monitoring. Monitoring may include, but is not limited to, ensuring that equipment is in good working order, that it is the actual equipment specified at the time of purchase, and that the equipment is being used for HMIS activities and by licensed HMIS users.

- All equipment used to access or transmit client information shall meet all HMIS security and confidentiality requirements applicable to Service Providers.

- The HMIS Lead will notify Service Providers and schedule an on-site visit appointment prior to conducting annual HMIS monitoring.

- The HMIS Lead will provide Service Providers and Users with copies of all monitoring forms, Acknowledgements, training documents and Service Provider Contract copies related to the monitoring process and required training and renewals.

- The HMIS Lead monitoring staff will meet with all licensed users to ensure the security of hard-copy client data as well as computers used for HMIS access.

- Monitoring staff will inspect any equipment purchased with HMIS scholarship funds to determine location, condition, and appropriate use.

- The HMIS monitoring staff may provide refresher training in areas that the HMIS Lead has determined are most needed to protect the security and confidentiality of client data.

**Section 2: System Security**

**Software Security**

The BoS CoC HMIS software of choice is ServicePoint (trademarked and copyrighted by WellSky). ServicePoint is a client information system that provides a standardized assessment of a client’s needs, creates individualized service plans and records the use of housing and services which communities can use to determine the utilization of services of participating Service Providers, identify gaps in the local
service continuum and develop outcome measurements. IHFA has entered into a contract with WellSky permitting IHFA to participate in its HMIS implementation.

Client data will be encrypted at the server level when the information is entered at the time of transmission to the ServicePoint system.

ServicePoint is a web-based software encrypted for secure transmittal and storage. Implementation of ServicePoint involves a centralized database where participating Service Providers, with client consent, can enter and access Client information, and all data is encrypted at the database level. This means that anyone hacking into the server would not see any Client information. This encryption tool is state of the art. All changes, additions and deletions to Client records are tracked by the system and can identify the User and the action. Information can be locked or unlocked, viewed or not, depending on the User Access Level of the viewer. This provides a level of security and accountability for the Service Provider’s database. The SSL protocol that WellSky uses within ServicePoint is a form of Public Key Infrastructure (PKI), which includes key establishment and server authentication.

**User IDs and Passwords Policy**

Every HMIS User is authenticated with a unique User ID and password. Users shall keep their User IDs and Passwords secure.

**Procedures**

- Passwords must be a minimum of 8 characters and include at least one uppercase letter, one lowercase letter, one number, and one symbol.
- Sharing of user ID and password is forbidden.
- Do not select a trivial, predictable or obvious password or a common word found in the dictionary or any of the below spelled backwards.
  - Trivial passwords include common words like ‘secret’, ‘password’, or ‘computer’
  - Predictable passwords include days of the week, months, or a new password that has only a one or two character difference from the previous password.
  - Obvious passwords include User name, User ID, HMIS, the HMIS vendor name, names of persons, pets, relatives, cities, addresses, birth date, car license plate, and so on.
- Passwords are required to be changed every 45 days.
- A User will be locked out of the system after three consecutive bad logon attempts and will need to reset their password or contact the System Administrator to regain access.
- Do NOT use someone else’s or password or let anyone use your User ID. If you, or someone at your agency needs more access, or if you are having problems with your access, contact your System Administrator for help.
- Users must not store or display their User ID and/or password in any publicly accessible location.
- Beware of “shoulder surfers”. These are people who stand behind you and look over your shoulder while you are keying in your password or are working with confidential information.

**Equipment Policy**

All computers used to access HMIS must be kept secure to prevent unauthorized access to HMIS or HMIS data.
Procedures

- The computer must be enabled with a password-protected screensaver with a timeout.
- The computer must be equipped with a commercially-available antivirus program set to automatically update the antivirus definitions files and regularly run system scans.
- The computer or network computer that is accessing HMIS must be protected from outside intrusion by a software or hardware firewall.
- The User shall log off of HMIS and shut down the browser when not using HMIS.

Section 3: Data Standards

HUD and the federal partners worked collaboratively to develop the HMIS Data Standards, HMIS Data Dictionary and the HMIS Program Manuals. Data quality standards standardize expectations and provide guidance to HMIS participating programs and ensures sufficient data on clients, their demographics, characteristics and services, which will facilitate confident reporting on the extent and characteristics of homelessness in our state.

The Data Standards refer to the type of data to be collected, create standard definitions of each data element, identify the population of whom data is collected and when it should be collected.

The Data Standards are reviewed annually by HUD and the federal partners and updated as needed. The current HMIS Data Standards Manual can be found on the HUD Exchange website (www.hudexchange.info).

The Data Standards Manual is designed to help CoCs, HMIS Lead Agencies, HMIS System Administrators, and HMIS Users to help them understand the data elements that are required to be collected in order to meet the participation and reporting requirements established by HUD and the Federal Partners. Communities may Service choose to incorporate additional data elements they may find useful for local or state reporting purposes.

Data Standards Policy

The HMIS Lead, CoC, Service Providers and Users shall abide by all of the standards and conditions related to data quality as described in the most recent Data Standards Manual.

Procedures

- All HMIS Users will receive Data Standards training as part of the initial HMIS training.
- Updates, revisions and changes to the Data Standards will be communicated to the Service Providers via direct training (via phone, other electronic means or in person), via email, or by other communications deemed appropriate to distribute the updates and fully inform those affected by the changes.
- The HMIS Data Standards training material will also be updated to reflect the changes.
Data Collection Requirements

The Data Standards Manual outlines the data collection requirements each of the HMIS federal partners has for data collection. It is possible multiple federal funding sources will be used in a single project (e.g. an emergency shelter project may be funded by both ESG and RHY). When a project is funded by multiple federal partners, it is important that all elements required by each of the federal partners are collected and that appropriate reporting can be produced according to each funder’s requirements.

Projects that choose to participate in Idaho HMIS without any funder requirement should, at minimum, collect Universal Data Elements (UDE) and those elements required for System Performance Measurement or are established for project types by local community requirements. They may also collect any appropriate Program Specific Data Elements (PSDE) needed for the project’s own reporting purposes.

Universal Data Elements (UDE)

The Universal Data Elements (UDE) are collected in HMIS by all projects regardless of funding type. The UDEs establish the baseline data collection requirements for all contributing CoC projects. They are the basis for producing unduplicated estimates of the number of people experiencing homelessness, accessing services from homeless assistance projects, basic demographic characteristics of people experiencing homeless, and patterns of service use, including information on shelter stays and homelessness over time.

Response categories of “Client doesn’t know” and “Client refused” are options on all data fields. The response category of “Data Not Collected” is available on some date fields but will be counted the same as missing data, which can affect the CoC and funding availability.

Program Specific Data Elements (PSDE)

The common PSDEs are collected across most federal partner programs. PSDEs provide information about the characteristics of clients, the services that are provided, and client outcomes. These data elements must be collected from all clients served by programs that are required by their funding source.

For programs with no such reporting requirements, these data standards are optional but recommended since they allow local CoCs to obtain consistent information across a range of providers that can be used to plan service delivery, monitor the provision of services, and identify client outcomes.

PSDEs differ from the UDEs in that no one project must collect every single element in this section. Which data elements are required is dictated by the reporting requirements set forth by each Federal partner for each of its programs. A Partner may require all of the fields or response categories in a data element or may specify which of the fields or response categories are required for their report.

Local CoCs may elect to require all contributing continuum projects to collect a subset of the data elements contained in this section to obtain consistent information across a range of projects that can be used to plan service delivery, monitor the provision of services, and identify client outcomes. However, these data elements do not constitute a client assessment tool, and projects must develop their own data collection protocols in order to properly assess client service needs.
Program Manuals

Separate Data Standards Manuals have been created to provide guidance and direction for PATH, RHY, HOPWA, VA and CoC usage of HMIS. PATH and RHY operate under unique circumstances within the CoC and deal with a more specific set of issues with their respective subpopulations. Any updates or changes to the PATH or RHY Data Standards will be communicated to the respective PATH or RHY Service Providers by the HMIS Lead.

Data Quality and Monitoring Plan

The Idaho Balance of State CoC has an HMIS Standard Plan that covers Data Quality, Privacy and Security. The Data Collection, Reporting and Evaluation (DCR&E) Committee, working in collaboration with the HMIS Lead, is responsible for reviewing and updating the HMIS Standards Plan annually and submitting to the CoC for approval.

The CoC understands the need for quality data that accurately reflects the valid and true nature of homelessness in Idaho for analysis and reporting. These standards take in consideration the diverse nature and project scope of all programs across the state to ensure that data is entered in a timely and consistent manner while protecting client-level data.

The Data Quality and Monitoring Plan incorporates, by reference, the current Policies and Procedures. The Data Quality and Monitoring Plan sets forth the expectations and benchmarks for high quality data that accurately reflects the information on persons experiencing homelessness and the programs that serve them. The plan is operated in compliance with the current HMIS Data Standards and will be updated to reflect revised and/or new regulations and industry standards as required.

All key staff members involved in the collection, analysis, and dissemination of data and are required to have a shared understanding for the purpose of data collection.

Data Entry Timeliness Policy

Entering data in a timely manner helps to reduce errors and missing and incomplete data that can occur when too much time has passed between the time of the client intake/service transaction and the actual data entry.

The Service Providers and Users shall consistently enter information into the HMIS database on a weekly basis. In the event that weekly data entry cannot be made, the Service Providers and Users shall have all data entry completed for the month by no later than the 5th business day of the following month.

Data Completeness Policy

In order to facilitate high quality reporting and analysis the data collected and entered in HMIS must be as complete as possible. Partially complete or missing data can affect the ability of the CoC to meet various funding compliance requirements.
Data Accuracy and Consistency Policy

Information entered into the HMIS needs to be valid in order to accurately represent information on persons experiencing homelessness and the agencies that provide services. Inaccurate data can affect reporting on project performance and could adversely affect the CoC and funding sources.

Procedures

- Monthly, Quarterly, and Annual Reports will be generated from the HMIS for the CoC and designated committees for review and quality assurance.
- The HMIS Lead will run audits as needed for the CoC, the HUD grantee, or to meet other requirements of CoC reporting.
- The CoC receives quarterly reports from HMIS Lead to monitor the HMIS Standards Plan. Reports will be reviewed to ensure that benchmarks set by the Strategic Planning Committee have been met and if not, suggest or implement corrective actions as required.

Section 4: Contractual Requirement and Roles

The Idaho HMIS is operated within the framework of agreements, policies and procedures that have been developed and approved over time by the Idaho BoS CoC. These include but are not limited to, the HMIS Governance Agreement, Policy and Procedures, Service Provider Contract, and User Agreement. Deletions, additions or revisions may be required to have CoC approval before the existing agreements, policies and procedures can be changed.

Contractual Requirements and Roles Policy

IHFA and HMIS Participating agencies are bound by all, but not limited to, the above-mentioned contractual obligations. These contracts and agreements spell out the obligations, rights and responsibilities of the contracting parties. IHFA and the CoC are bound by the terms and conditions outlined in the IHFA HMIS Governance Agreement. IHFA functions as the Collaborative Applicant for HUD funds and acts as the HMIS Lead.

The HEARTH Act has instituted the use of HMIS in response to the requirements of the United States Congress and as directed by the HUD requiring implementation and operation of management information systems for purposes of collecting unduplicated counts of homeless individuals and analyzing patterns of use of persons seeking assistance.

The CoC has determined that the activities, administration, policies, procedures and oversight of the Idaho HMIS program will be directed by the Collaborative Applicant, the Data Collection, Reporting and Evaluation (DCR&E) Committee and the HMIS Lead. The DCR&E Committee is a sub-committee in the Idaho Homelessness Coordinating Committee (IHCC).
**Service Provider (Agency)**

A Service Provider that is a sub recipient of federal funding disbursed through IHFA is required to participate in HMIS by contributing and recording data of individuals (hereinafter referred to as “Client”) participating in such federally-funded programs.

A Service Provider using HMIS for client data entry and recording but who does not receive federal funding shall be covered by the same rules and obligations as those Service Providers receiving federal funding.

IHFA shall create Policies and Procedures with such Policies and Procedures hereby incorporated into the HMIS Service Provider Contract.

The contracting parties warrant by their signature that no employer-employee relationship is established between IHFA and the Service Provider by the terms of the HMIS Service Provider Contract.

The HMIS Service Provider Contract may be terminated by IHFA or HUD at any time with or without cause upon ten (10) days written notice by IHFA to the Service Provider. If termination is for breach of Client’s confidentiality, as required under the HMIS Service Provider Contract, and by state and federal laws, then IHFA or HUD may terminate the contract immediately.

If the HMIS Service Provider Contract is terminated, IHFA shall maintain its right to the use of all Client data previously entered by the terminating Service Provider; such use is subject to any restrictions requested by the Client.

Due to the nature of information contained on the HMIS system, the Service Provider shall not assign its rights or obligations under the HMIS Service Provider Contract to any other party without the prior approval of IHFA.

**Service Provider’s HMIS Users**

The Service Provider shall follow, comply with and enforce the User Agreement. The User Agreement may be modified as needed for the purpose of efficient operation of the HMIS system. IHFA will announce approved modifications in a timely manner. The Service Provider is responsible for the Users data entry accuracy, correctness and completeness.

**Reports and Information**

The Service Provider may make aggregate data on clients it services available to other entities for funding or planning purposes pertaining to providing services to homeless persons. However, such aggregate data shall not identify individual Clients.

- The Service Provider shall not make available to other entities any data on clients it does not serve.
- The Service Provider shall be responsible for HMIS data entry compliance for client data and reports.
- The Service Provider shall periodically (or when requested by the System Administrator) run and review audit reports to ensure data integrity.
- The Service Provider have full reporting access to any clients they serve. There are a variety of canned reports available in HMIS along with a Report Writer function which Users have full access to.
- The Service Provider and/or Users’ access to HMIS data on clients it does not serve shall be limited based on the current status of any release of information.
- The Service Provider shall not be denied access to Client data entered by the Service Provider. Service Providers are bound by all restrictions placed upon the data by the Client and any Service Provider. The Service Provider shall diligently record and take all other appropriate actions to assure the HMIS includes and reflects all restrictions Client has requested.

**Service Provider Audit, Recordkeeping and Reporting**

Service Provider may be subjected to system audits.

Service Providers who receive federal funding through IHFA may have grant monies may be withheld by IHFA at its discretion until the Service Provider has demonstrated acceptable levels of participation and data entry.

The Service Provider agrees to make available to IHFA any requested information and documentation needed to monitor use of HMIS. The program will be subjected to monitoring on HMIS Policy and Procedures, Standards Plans, reporting and federal, state and local regulations and laws that protect client records.

The Service Provider agrees to comply with IHFA requirements to collect data for persons experiencing homelessness or who are at-risk of homelessness. The requirements will be outlined in the Policies and Procedures, and under the terms of the Service Provider Contract.

**General Conditions**

Service Providers participating in HMIS, whether due to federal funding requirements, or as non-federal funded voluntary HMIS users, are required to enter into a Service Provider contract with IHFA.

The HMIS Service Provider contracts will be renewed annually. All Service Providers participating in HMIS must be current in all related contracts.

Without limiting the right of IHFA, HUD, HHS or VA to terminate without cause as called for above, the Service Provider agrees that IHFA or HUD may immediately amend or terminate any or all parts of the Service Provider Contract at any time if it is determined that grant funds allocated for associated projects have been misused, used for ineligible activities or ineligible agencies, or used in an inconsistent manner with the conditions of the grant application, the grant agreement, the Service Provider Contract and/or any IHFA or HUD governing regulations, policies, and/or procedures.

The Service Provider acknowledges that IHFA may use one or more of the following remedies when it is known that the terms of the Service Provider Contract or associated grant agreements have not been followed: demand full or partial repayment; terminate the Service Provider Contract and/or litigation in the district court of Ada County.

Section 30-3-81, the Idaho Nonprofit Corporation Act, and Idaho Code §18-1359 through 18-1361, identify conflicts of interest by public and non-profit employees. The Service Provider agrees to meet these statutory requirement and further represents that nothing of monetary value has been given, promised or implied as remuneration for entering into this Contract and that there will be no personal financial gain by the executive director or other managerial staff, employees or the family member(s) of
employees as a result of the Service Provider Contract.

**HMIS Lead/System Administrator**

The HMIS Lead is responsible for the overall organization, administration and management of the Idaho BoS CoC HMIS, and adherence to the regulations of the federal programs that use HMIS. The HMIS Lead works under the direction of the CoC in conjunction with the Collaborative Applicant and the DCR&E Committee. The HMIS Lead contracts with each participating Service Provider, administers the HMIS grant funds, monitors participating agencies and users for compliance and security and drafts, reviews, recommends and implements CoC-approved HMIS activities, functions, reports and procedures.

The HMIS Lead and the BoS CoC have entered into a Governance Agreement that sets forth the structure for both parties. As such this Governance Agreement establishes the general understandings and specific responsibilities of each party relating to key aspects of the governance and operation of the HMIS.

To optimize HMIS outcomes, the CoC may recognize a need for a CoC System Administrator who will coordinate the HMIS program at the local level. The System Administrator will operate within the guidelines of the HMIS System Administrator Program, the HMIS Policy & Procedures and abide by all federal, state and local confidentiality and privacy regulations and laws that protect client records accessed or entered into the HMIS.

IHFA serves as the HMIS System and CoC Administrator under the terms of the Service Provider Contract. IHFA, as the system administrator, reserves the right to contract with a CoC’s Collaborative Applicant or other CoC lead agency, for purposes of establishing localized HMIS System Administration support, as described in IHFA’s HMIS System Administrator Program.

As the HMIS Lead and custodian of data, IHFA shall have access to all of the CoC’s agencies, programs and client information pertaining to HMIS as called for under the HMIS System Administrator Program.

The HMIS System Administrator will adhere to and enforce all of the policies and procedures in the HMIS Governance Agreement as well as the Service Provider Contract.

The HMIS System Administrator shall approve the publication of aggregate data to the CoC.

IHFA and any CoC System Administrator shall use HMIS information for reporting, auditing, planning and research purposes only. Information used for public reporting purposes shall not include personally identifying information and be limited to statistical data.

The HMIS Lead or CoC System Administrator will regularly run review and draw audits, data completeness audits, APR audits, data quality and/or system security Audits and reports. Results of these reports may be shared with Service Providers in the Continuum of Care, and other organizations as required.

The HMIS lead will utilize existing HMIS reports where available and applicable, and will develop specialty reports if the request for information is feasible. It may take the HMIS Lead up to the 30 days to fulfill the request or, if the report cannot be produced in thirty days, respond with alternative options.

The HMIS Lead shall apply patches and upgrades to the system and send out notification and documentation prior to the event.

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Collaborative Applicant

The Collaborative Applicant provides oversight of HMIS and works in conjunction with the Data Collection, Reporting and Evaluation Committee (DCR&E) to support the overall initiative and success of the HMIS program. The Collaborative Applicant provides oversight, project direction, policy decisions, and directs the HMIS Lead on behalf of the CoC as outlined in the Idaho Balance of State Governance Charter. The Collaborative Applicant monitors the HMIS for compliance and adherence to the CoC approved plans.

IHFA is the direct grantee of HUD and acts as a financing disbursement conduit between HUD and Service Providers to implement programs consistent with the federal law. These laws include without limitation the requirements found in HUD Appropriations Act, 24 CFR 84, and any other federal statute or regulation pertaining to the implementation, use of and monitoring/audit of the Homeless Management Information System (HMIS). Service Provider agrees to comply with these requirements, which are incorporated as part of the Service Provider Contract.

IHFA has been designated as a Unified Funding Agency (UFA) by HUD, which is a designation that allows a Collaborative Applicant to receive and distribute funding for all projects in a CoC under a single entity. This gives the Collaborative Applicant additional autonomy to make decisions about how funds should best be allocated among projects in the community as well as additional responsibility to monitor funds and project performance.

Idaho Homelessness Coordinating Committee (IHCC)

Idaho Homelessness Coordinating Committee (IHCC) is the governing body for homeless service planning for the State of Idaho. One of the primary functions of the IHCC is to serve as the Idaho Balance of State Continuum of Care Board (“The Board”).

IHCC committees report to the Board and serve as the CoC planning body.

Responsibilities

The Board serves as the Continuum-designated primary decision-making group and works with the IHCC committees and the CoC Collaborative Applicant, Idaho Housing and Finance Association (IHFA) to fulfill three major duties:

1. Operate the CoC
2. Designate and oversee a HMIS
3. CoC Planning

Data Collection, Reporting and Evaluation Committee (DCR&E)

The DCR&E is a working sub-committee in the IHCC that supports and enhances the mission of the HMIS program. The committee serves as a liaison to the six regional housing coalitions for the CoC. Data Collection, Reporting and Evaluation involve not only the HUD required programs, but also other federal partners such as Veterans Affairs and Health and Human Services, as well as faith-based and non-profit agencies not participating in HMIS.
The DCR&E committee works in conjunction with the Collaborative Applicant and the HMIS Lead to provide guidance and oversight of HMIS. The DCR&E Committee helps draft, revise, review and present recommendations to the CoC on HMIS activities, functions, reports and procedures.

Committee members will assist in the coordination of Regional Coalition meetings to assess the DCR&E projects, will include data standards and data quality review, Point-in-Time (PIT) Count, Housing Inventory Counts (HIC), Longitudinal Systems Analysis (LSA), Continuum of Care Notice of Funding Availability application, Continuum of Care ad-hoc reporting and pilot projects.

**Funding/Participation Fees**

To ensure a sustainable and mature HMIS program and to meet the operational demands of the HEARTH Act, the Idaho Balance of State Continuum of Care has instituted an HMIS Fee Structure. The HMIS Fee structure represents a method to distribute the cost across all programs using HMIS, and to develop a more diverse funding base, increase equity in participation, and reduce the financial burden on any one Service Provider. This will help ensure a fair, reasonable and affordable structure for the continued operation of a strong HMIS in Idaho and encourage consistent participation by recipients, sub-recipients and non-HUD funded programs that provide homeless assistance activities.

**HMIS Funding/Participation Fees Policy**

Administration of HMIS is covered by HUD CoC grants, ESG funding, projects participating in HMIS and HUD-required match funds. The terms of uses of HMIS funds are governed by the funding source requirements, grant agreements and applicable rules.

**Procedures**

- The HUD CoC grants have a cash match requirement. IHFA retains responsibility for facilitating the commitment of the local match for the HMIS dedicated grants. Continuing match funding is subject to and contingent upon available annual financing from local jurisdictions, partner agencies or other non-profit, charitable foundations.

- The HMIS fees charged to a Service Provider are explained in the Service Provider Contract.

- In the event there is a shortfall in the cash match the CoC agrees to explore other funding options if needed.

- Scholarships are available, funds permitting, for HMIS activities such as setup fees, annual costs, licenses, training costs, computers and hardware, and other HMIS activities. Home Partnership Foundation grant recipients or voluntary agencies (currently not receiving HUD or other federal funding for the specific program) that want to participate, but do not have the resources to pay for the cost themselves, may be covered as well.

**Comparable Database**

Domestic Violence (DV) providers are prohibited from entering data on their clients into an HMIS yet are required to use a comparable database to collect and report on universal and program-specific data.
Comparable Database Policy

Domestic Violence Service Providers wishing to use CMIS for data entry, retrieval and reporting purposes will be under the same contractual obligations as HMIS Service Providers expect in those instances where, due to the separation of databases and type of client data, separate contracts, agreements or clauses directly relating to CMIS and its usage apply.

Section 5: HMIS Use

HMIS use is the responsibility of all Service Providers, Users, CoC System Administrator and the HMIS Lead. All parties shall abide and comply with all policies and procedures of HMIS and shall keep abreast of all ServicePoint updates and policy changes.

Service Providers and their authorized Users shall not misrepresent their client base in the HMIS database by entering known, inaccurate, false or misleading data under any circumstances. The Service Provider and User will not alter information, with known inaccurate information, that has been entered into the HMIS database by another Service Provider or User.

Service Providers and their authorized Users shall not cause in any manner or way known corruption of the HMIS database. Report any discrepancies in the use of the IHFA HMIS system, including without limitation access of information and entry of information, to the Service Provider Director or to the HMIS System Administrator.

The use of the HMIS database with the intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity, will be grounds for legal action.

HMIS Use Policy

Access to the HMIS system is limited to the Users authorized by the Service Providers, the CoC System Administrator and the HMIS Lead. The Service Provider shall identify, approve and authorize their respective Users and are responsible for contacting the HMIS Lead for revoking, adding or editing Users access.

Users are required to follow, comply with and enforce the User Agreement. The User Agreement may be modified, with notification, by IHFA at its discretion, as needed for the purpose of efficient operation of the HMIS system.

Procedures
• All HMIS Users must receive the Policy & Procedure training on privacy, security confidentiality and data standard requirements of HMIS prior to receiving their system training and access to the live HMIS database.

• All Users shall sign and abide by the terms and conditions stated in the Policy & Procedures, User Agreement, Data Standards Acknowledgement and Policy and Procedures Acknowledgements.

• The Service Provider’s Executive Director or other agency authorized individual is responsible for: ensuring that all users needing access to the HMIS system and/or data receive the necessary preparatory training, authorizing users to receive training, agreeing to ensure that users under their employ/jurisdiction abide by all rules, regulations, policies and procedures related to HMIS usage, and requiring members of its staff that access HMIS data to attend all subsequent pertinent trainings as offered by the HMIS Lead. Training documentation is kept on file by the HMIS Lead.

• The Service Provider shall be responsible for entering Client data, reviewing the data entry, and running reports for all clients they serve.

• The Service Provider shall have representation at all agency/regional data quality review meetings if needed.

• The Service Provider shall periodically (or when requested by the HMIS Lead) run and review audit reports to ensure data integrity.

• Users shall only enter individuals in the HMIS database that exist as Clients under the Service Provider’s approved area of service.

• Users shall enter ROI information (Client Consent and Release of Information Authorization) on all clients. Sharing data is optional but entering data is not optional. An ROI shall be recorded for all clients, even if not sharing data.

• Users shall not include profanity or offensive language in the HMIS database.

• Users shall utilize the HMIS database for business purposes only.

**Licenses and User Access Levels Policy**

Once training is complete, Users will be issued a User License through their Service Provider. This license allows the user to access HMIS and read client data, enter client data and run reports depending on the user’s HMIS access level.

HMIS user access levels control who can see which information. Confidentiality is a primary concern and these levels of access help control access to information. Lower levels allow viewing only of basic demographics while middle levels allow additional information to be viewed, added and or updated. The highest level allows access to Service Provider functions and unlimited client access.

**Procedure**
• The HMIS Lead shall aid in the determination of HMIS User access level. The level will be based on each User’s job function as it relates to HMIS data entry and retrieval schema.

Section 6: Training

Training is an essential component of the HMIS access and use guidelines. All HMIS users must be aware of the confidential nature of the client data they are collecting, the laws, rules, regulations and policies related to data integrity and security, data standards relating to HMIS use. Users must consider the ramifications connected to insufficient data security processes, and the effects on the Service Provider, user and client if client data is not entered in a timely, accurate and complete manner.

Training Requests Policy

The HMIS Lead shall provide training and periodic updates to that training to select Service Provider Staff on the use of the HMIS software. Training includes but not limited to: basic new user training, policies and procedures, intermediate user training, advanced user training, reports training, program enhancement, upgrades, refresher training, requested training, Data Standards, Federal Partner requirements, and CoC or other Service Provider requested training.

Procedures

• Service Providers are responsible for ensuring that all staff, volunteers and other persons in their organization using or accessing information from HMIS receive confidentiality training to include HMIS use and all applicable HMIS security and confidentiality requirements.

• Service Providers will submit their training request to HMIS along with the information on the person needing training. Service Providers should submit their training request via e-mail, to hmis@ihfa.org. The HMIS lead will evaluate the request and if approved, will work with the Service Provider to schedule HMIS training.

• The HMIS Lead will, through monitoring activities, determine areas where additional HMIS training might be need by individuals, agencies or across the CoC. Such training will be incorporated in the onsite monitoring visits where applicable. Major changes in HUD requirements or software changes may necessitate further training. In these events the HMIS Lead will reach out to the CoC or individual Service Providers to arrange additional or updated training.

• The HMIS Lead will develop and conduct refresher or other training, based on results of technical assistance, reports, requests and on- and off-site monitoring, that the HMIS Lead determines will help the Service Provider to maintain data security and integrity, and enhance data quality. Such training may be conducted onsite during subsequent monitoring visits, may be conducted onsite at the discretion of HMIS and the Service Provider, or may be offered in electronic form by phone, webcast or other means.
Section 7: Technical Support

The HMIS Lead is available for technical assistance such as HMIS requirements and procedures, system troubleshooting and report generation. HMIS technical support is available Monday through Friday, 8am-5pm, Mountain Time, excluding holidays.

Technical Support Policy

The HMIS Lead will provide technical support related to the operation and functions of the Idaho Balance of State HMIS implementation. The HMIS Lead does not function as an IT (Information Technology) provider of services related to hardware and network operations.

Procedures

- Service Providers and Users will contact the HMIS Lead with questions and requests concerning HMIS services such as data entry, report generation, policies, procedures and software functionality.
- Users requesting technical support are encouraged to send their requests via email to hmis@ihfa.org.
- Requests submitted by phone are also accepted but typically a written request is preferred and often a follow-up email is requested.
- HMIS Lead staff will reply to the Service Provider within one business day to answer the inquiry when possible, or to gather more information and facts from the Service Provider regarding their request so that IHFA Lead staff can address and answer the request.

System Availability Policy

The HMIS Lead will contact Service Providers and users to provide updates and expected time to restore system availability in the event of a system outage. The HMIS Lead will maintain close contact with the software vendor until the time that the outage is resolved and full access is restored.

The HMIS Lead is responsible for ensuring that all necessary patches or system upgrades occur in a timely manner. Since most of these functions are performed by the software vendor, HMIS Lead will notify end users and agencies of any anticipated effect on system availability prior to the event.

Procedure

- The HMIS Lead will notify Service Providers and Users of any anticipated effect on system availability, including but not limited to system availability, when upgrades and patches are applied to HMIS by the vendor.
Section 8: Reporting

The data collected in HMIS is used mainly for reporting purposes to HUD, Federal Partners, the CoC and other organizations using HMIS.

The HMIS Lead responds to requests from Service Providers, Users and IHCC committees for ad hoc or special focus reports. Custom reports may be requested at any time from the System Administrator. The general public can request reports for non-identifying aggregate and statistical data by completing a Data Request Form.

Reporting Policy
HMIS data is reported only at a non-identifying aggregate and statistical level.

Only the HMIS Lead Agency or the CoC may approve publication of aggregate data specific to the continuum. Organizations may approve publication of data specific to their organization. The analysis and publication of community-wide numbers will be guided by the CoC or HMIS lead agency designated committees or workgroups.

The general public can request reports for non-identifying aggregate and statistical data by completing an Information Request Form. The HMIS Lead will address all requests for data entries other than Service Providers or clients. Non-identifying aggregate and statistical data will not contain outliers. Outliers may be removed if they represent less than 5% of any value.

HMIS Data is used to produce some or all of the following reports:

- Point-In-Time Count (PIT)
- Longitudinal System Analysis (formerly Annual Homeless Assessment Report (AHAR))
- System Performance Measurements (SPM)
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Required Federal Partners Reports
- Annual Performance Report (APR)
- System Reports
- Ad-Hoc Requests
- CoC Quarterly Reports

Section 9: Internal Operating Procedures

IHFA, as the HMIS Lead for the Idaho BoS CoC, operates under the same standards and conditions as do the Service Providers concerning HMIS use and security. IHFA also has several unique roles to play as the System Administrator for HMIS, such as disaster recovery operations.

The HMIS Lead shall enforce all Policy and Procedures regarding HMIS use and responsibilities and ensure that the internal operations of IHFA are in compliance with those operating standards.
Disaster Recovery Policy

IHFA shall act as the main point of contact between Service Providers and Users in the event of system failure due to some form of disaster.

Procedures

- In the event of a disaster affecting IHFA and necessitating the restoration of the Idaho Balance of State CoC HMIS implementation, the IHFA Information Technology department is responsible for restoring all internal IHFA operations, including connecting to the internet to allow IHFA HMIS users to access ServicePoint.

- In the event that the disaster affects the software provider, WellSky, has in place a disaster and recovery plan which they will implement to return service as quickly as possible, or prevent the disruption of service, if possible.

- In the event of either scenario, IHFA and WellSky will be in regular and close contact and will send out updates to all affected Service Providers as progress on system restoration permits.
Definitions

Agency—Any organization providing services to eligible homeless or near homeless persons. Agencies using HMIS are also referred to as Service Providers.

Annual Homelessness Assessment Report (AHAR)—HUD’s annual report that provides Congress with detailed information on individuals and households experiencing homelessness across the country each year.

Consolidated Annual Performance and Evaluation Report (CAPER)—The primary mechanism for Emergency Solutions Grants (ESG) Program is accomplishment reporting. This is used to report comprehensive, nationwide data that shows the impact of the ESG Program across the country.

Client—An individual about whom a Service Provider collects or maintains protected personal information: (1) because the individual is receiving, has received, may receive or has inquired about assistance from a Service Provider; or (2) in order to identify needs, or to plan or develop appropriate assistance within the CoC.

Collaborative Applicant—The Collaborative Applicant provides oversight of HMIS and works in conjunctions with the Data Collection, Reporting and Evaluation Committee to support the overall initiative and success of the HMIS program. The Collaborative Applicant provides oversight, project direction, policy decisions, and directs the HMIS Lead on behalf of the CoC as outlined in the Idaho Balance of State Governance Charter. The Collaborative Applicant monitors the HMIS for compliance and adherence to the CoC approved plans.

Community Management Information System (CMIS)—Information system developed and administered by IHFA on behalf of the state’s DV Service Providers. DV providers are prohibited to enter DV client information into an HMIS. The CMIS fulfills the requirements for a comparable database while simultaneously providing reporting support for information required by HUD.

Comparable Database—HUD prohibits DV providers from entering data on their clients into an HMIS yet are required to use a comparable database to collect and report on universal and program-specific data elements. The Community Management Information System (CMIS) developed and administered by IHFA provides this functionality for the state’s DV providers.

Continuum of Care (CoC)—The primary decision-making entity defined in the funding application to HUD as the official body representing a community plan to meet the specific need of people who are homeless as they move to stable housing and maximum self-sufficiency.

Coordinated Entry (CE)—A comprehensive process that standardizes the way individuals and families at risk of homelessness or experiencing homelessness access are assessed for and referred to the housing and services that they need for housing stability.

Database—An electronic system for organizing data so it can be easily searched and retrieved.

Data Quality Framework Report—Used for the System Performance Measures and the CoC APR and CAPER review.

Data Collection, Reporting and Evaluation (DCR&E) Committee—The DCR&E is a working sub-committee in the IHCC that supports and enhances the mission of the HMIS program. The committee
serves as a liaison to the six regional housing coalitions for the CoC. The DCR&E committee works in conjunctions with the Collaborative Applicant and the HMIS Lead to provide guidance and oversight of HMIS. The DCR&E Committee helps draft, revise, review and present recommendations to the CoC on HMIS activities, functions, reports and procedures.

**Domestic Violence (DV) Service Provider**—Service Provider whose primary mission is to service victims of domestic violence and provides housing and other services to individuals experiencing domestic violence.

**Executive Director**—The administrative person who runs and directs the operations of a Service Provider and who has the authority to authorize User access to HMIS.

**Federal Partners**—The HMIS Federal Partners worked collaboratively to develop the 2014 HMIS Data Standards. HUD has worked with program staff of the federal partners to align the data elements required for each program funding source and determine how and when data is to be collected.

**Governance Agreement**—Sets forth the governance structure for the Idaho Homeless Management Information System (HMIS) for the Idaho Balance of State Continuum of Care (CoC). The agreement establishes the general understandings and specific responsibilities of each party relating to key aspects to the governance and operations of the Idaho HMIS.

**Governance Committee**—Committee Members develop Policies and Procedures for IHCC and will identify processes to create specific task-oriented and/or permanent committees to meet the ongoing needs of the IHCC committees. This committee will ensure shared communication among other committees and members of the IHCC. The committee will ensure that the IHCC meets at least quarterly and will develop agendas and materials to help meet strategic planning goals as set by the Strategic Planning Committee.

**Housing Inventory Count (HIC)**—The HIC is a point-in-time inventory of projects within a CoC that provide beds and units dedicated to serving persons who are homeless. It is intended to provide HUD and CoCs with information about the shelter and housing capacity of homeless crisis response systems. It should reflect the number of beds and units available on the night designated for the count that are dedicated to serve persons who are homeless (and, for permanent housing projects, were homeless at entry), per the HUD homeless definition.

**Homeless Management Information System (HMIS)**—Information system used to record, analyze and transmit client and activity data in regard to the provision of shelter, housing and services to individuals and families who are homeless or at risk of homelessness in a Continuum of Care (CoC).

**HMIS Lead**—An organization designated by a CoC to operate the CoC’s HMIS on its behalf.

**Idaho Balance of State Continuum of Care (Idaho BoS CoC)**—The Continuum of Care (CoC) covering the Service Providers providing homeless and homeless prevention services in Idaho, excluding Ada County.

**Idaho Homelessness Coordinating Committee (IHCC)**—The IHCC serves the State of Idaho and is represented by Regions one through six, the Boise City/Ada County Continuum of Care, and relevant agencies through the State. The IHCC functions as the Idaho Balance of State Continuum of Care Board. The purpose of the IHCC is to facilitate the coordination, communication, and cooperation of housing and supportive services.
Licensed User—Also referred to as “user”; an authorized individual who uses or enters data in an HMIS database.

HMIS Vendor—A contractor who provides materials or services for the operation of an HMIS. WellSky is the vendor of ServicePoint, the HMIS software used by the Idaho BoS CoC.

Non-Public Information (see also PPI)—Information about an individual that is of a private nature and neither available to the general public nor obtained from a public record. Non-Public Information includes without limitation a Client’s name, social security number and such personal identifying information.

Point In Time (PIT) Count—Idaho Housing and Finance Association (IHFA) is required by U.S. Department of Housing and Urban Development (HUD) to obtain a count of the number of unsheltered and sheltered homeless persons or families in Idaho. The PIT count is a one-night count of unsheltered and sheltered homeless persons. The PIT count must occur on one night during the last ten days in January.

Privacy Notice (IHFA HMIS Privacy Notice)—Service Providers must publish a privacy notice describing its policies and practices for the processing of PPI. IHFA has developed the IHFA HMIS Privacy Notice to meet these requirements which all Service Providers are required to use.

Program Specific Data Elements (PSDE)—Agencies which are recipients of HUD McKinney-Vento Act program funds must also collect program specific data elements to meet the requirements of their grant.

Protected Personal Information (PPI)—Any information that can be used to identify a particular individual. Protected Personal Information includes without limitation a client’s name, Social Security Number, Date of Birth, and such personally identifying that identifies directly, indirectly, by linking with other identifying information to identify a specific individual, or can be manipulated by a reasonably foreseeable method to identify an individual.

Release of Information (ROI)—Form to notify the client that his information will be entered into the HMIS and to obtain his consent to share said information with other Service Providers.

Sage—Sage is an online repository that allows greater flexibility to recipients, CoCs, and HUD to report and search CoC Program APR data. CoC grant recipients are required to submit their APRs using Sage beginning April 1, 2017.

Service Provider—All entities that have similar agreements to access the HMIS system as administered by IHFA, including IHFA, CoC System Administrators, and HUD.

Service Provider Contract—Contract entered into by Agencies (Service Providers) and IHFA concerning the rights and responsibilities of both parties related to the administration and use of HMIS.

Sheltered Survey—The Sheltered Survey is a count of the total number of persons in your project on the night of the last Wednesday in January. The survey also reports on subpopulations of Chronically Homeless, Disability, Youth and Veterans.
System Performance Measures (SPM)—A series of seven reports designed to help communities gauge their progress in preventing and ending homelessness and provide a more complete picture of how well a community is achieving this goal.

Un-affiliated Third Party—Any entity or individual other than the Service Provider entering into this contract, the HMIS System Administrator, or CoC System Administrator as called for under the HMIS Administrator Program

Universal Data Elements (UDE)—The Universal Data Elements, as identified in the HMIS Data and Technical Standards Final Notice (Federal Register Vol. 69 No. 146) are required to be entered into HMIS by all participating agencies regardless of funding source.

Referenced forms and documents can be found at:
https://www.idahohousing.com/homelessness-services-programs/hmis/
Revisions

Below is a list of revisions that have been made to this Policies and Procedures Manual since April 2019, from most recent to least recent.

May 2019

- User IDs and Passwords Procedures (page 7): added the specification that passwords must include at least one uppercase letter, one lowercase letter, one number, and one symbol.
- Added a Revision Section (page 27).