Pierce County Community Connection

Pierce County HMIS System

Policies and Procedures

Manual

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Signed Agreements:

1.0 Pierce County HMIS Partner MOU:

Policy:

Each participating agency/jurisdiction must have a signed Memorandum of Understanding (MOU) with the HMIS Lead Agency, Pierce County Community Connections to use the Pierce County HMIS system and must be compliant with the terms of the MOU to continue use of Pierce County HMIS .

Procedure:

A. Each participating agency/jurisdiction will be given two copies of the Pierce County HMIS Partner MOU by the HMIS Lead Agency staff for signature.

B. The participating agency/jurisdiction will sign and return both copies of the MOU to the HMIS Lead Agency.

C. HMIS Lead Agency staff will sign the MOU, retain one signed MOU and return the second copy to the agency/jurisdiction.

See Appendix A.

1.1 Privacy Agreement:

Policy:

A Privacy Agreement must be signed by each agency/jurisdiction staff who will handle client data intended for or generated by the Pierce County HMIS system prior to collecting or handling client data. The Privacy Agreement lists the privacy and confidentiality provisions to abide by.

Procedure:

A. Each participating agency/jurisdiction will provide HMIS Lead Agency staff with the names of their identified staff requiring certification and Privacy Agreements.

B. Each participating agency/jurisdiction's staff will be given a Privacy Agreement for signature at the Privacy and Security Certification Training.

See Appendix B.

1.2 User Agreement:

Policy:

A User Agreement must be signed by each Pierce County HMIS system user prior to a license being issued to that user and the terms of use must be adhered to in order to retain user access and rights.

Procedure:

A. Each participating agency/jurisdiction will provide HMIS Lead Agency staff with the names of their identified system users requiring licensed access.

B. Each participating agency/jurisdiction will be given a User Agreement for each of its Pierce County HMIS system users by the HMIS Lead Agency staff for signature.

C. HMIS Lead Agency Staff will retain the original User Agreements and copies will be provided to the agency/jurisdiction.

D. Licensed access to the Pierce County HMIS system will be granted after receipt of the User Agreement and completion of both Privacy and Security Certification Training and User Training.

See Appendix C.

Participating Agency/Jurisdiction:

2.0 Roles and Responsibilities:

Policy:

Each participating agency/jurisdiction is responsible for developing and maintaining an internal infrastructure to support and monitor their agency and users' adherence to the Governing Principles and Policies and Procedures of the Countywide Pierce County HMIS system.

Procedure:

A. Each participating agency/jurisdiction will identify an Agency Administrator who will hold final responsibility for the adherence of his/her agency's/jurisdiction's personnel to the Governing Principles, and Policies and Procedures outlined in this document.

B. Each participating agency/jurisdiction will identify personnel to fulfill the following roles for implementation and maintenance of the Pierce County HMIS system.

Policies and Procedures Administrator

1. Maintain Client Consent/Release forms.
2. Maintain current Pierce County HMIS -related files, including Privacy and User Agreements and Pierce County HMIS Partner MOU.
3. Maintain compliance with confidentiality policies.
4. Respond to end-user system questions.

Technical Administrator

1. Setup/monitor password screensavers and away from desk procedures.
2. Monitor end user workstation security.
3. Maintain internet connectivity.
4. Maintain and update firewalls and virus protection on agency computer system/network.
5. Respond to end-user system questions.
6. Work with Pierce County HMIS System Administrator on unresolved software issues.

2.0 Roles and Responsibilities: (Continued)

7. Work with Pierce County HMIS System Administrator when Administrative system changes are requested by Agency.
8. Maintain current Agency & Program I&R.
9. Run Provider Reports.
10. Create Custom Reports.
11. Add/edit Agency News.
12. Audit User Reports.

Agency Administrator

1. Lead contact for the Pierce County HMIS System Administrator.
2. Responsible for insuring Pierce County HMIS is properly utilized and in compliance in their agency.
3. Responsible for insuring that his/her agency's/jurisdiction's personnel adhere to the Governing Principles and Policies and Procedures outlined in this document.
4. Respond to questions from Technical Administrator and Policy and Procedures Administrator.
5. Oversee and monitor the ongoing tasks of the Technical Administrator and Policy and Procedures Administrator.
6. Represent agency/jurisdiction at periodic Pierce County HMIS Administrator meetings.
7. Bring ideas, concerns and issues to periodic Pierce County HMIS Administrator meetings to facilitate enhancements and improvements to the system.
8. Review system access logs and audit reports for suspicious activity monthly.

2.1 Access to Internet:

Policy:

Each participating agency/jurisdiction is responsible for maintaining their agency's/jurisdiction's Internet Connection and troubleshooting any problems with the connection.

2.2 Privacy Requirements:

Policy:

Each participating agency/jurisdiction must comply with the HMIS Privacy Standards 4.1 through 5.2.1 described in the HUD Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice, including all Baseline Requirements and with Additional Privacy Protections specified by the Pierce County HMIS Policies and Procedures manual.

Each participating agency/jurisdiction will document all baseline privacy requirements and all additional privacy protections in its Privacy Notice document.

Procedure:

A. Each participating agency/jurisdiction will document a Privacy Policy describing its policies and practices for the processing of Protected Personal Identifiers (PPI). This notice must include all baseline privacy protections and all additional privacy protections.

B. Agency/jurisdiction 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.

C. Each HIPAA covered participating agency/jurisdiction covered should address HIPAA requirements. Further guidance from CoC will be forthcoming as it becomes available regarding specific HIPAA covered entities.

Baseline Requirements:

All baseline privacy requirements described in the HUD Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice are included in full text and summary in Appendix C and Appendix D of this manual.

Additional Privacy Protections:

Collection Limitation

1. PPI will only be collected with the knowledge or consent of the individual (unless required by law).
2. Written consent will be obtained from the individual for the collections of personal information from the individual or from a third party.

Purpose Specifications and Use Limitation

1. Users and agency/jurisdiction agree to additional restrictions on use or disclosure of an individual's PPI at the request of the individual if the request is reasonable. The agency/jurisdiction is bound by this agreement except if inconsistent with legal requirements.

Access and Correction

1. Client appeals of a denial of access to or correction(s) of collected data will be accepted. Each participating agency/jurisdiction will adopt its own appeal procedure and describe the procedure in its Privacy Notice.

2. The agency/jurisdiction will provide to any individual appealing an access or correction decision a written explanation of the reason(s) for the denial.

Accountability

1. Each member of agency/jurisdiction staff (including employees, volunteers, affiliates, contractors and associates) of a participating agency/jurisdiction will undergo (annually or otherwise) formal training in privacy requirements.

2. Each participating agency/jurisdiction will establish a method, such as an internal audit, for regularly reviewing compliance with its privacy policy.

3. Each participating agency/jurisdiction will establish an internal appeal process for hearing an appeal of a privacy complaint or an appeal of a denial of access or corrections rights.

Participating Agency/Jurisdiction:

2.3 Notification of Privacy Protections:

Policy:

Each participating agency/jurisdiction will document all privacy protections in its Privacy Policy document.

Procedure:

A. Each participating agency/jurisdiction will document a Privacy Notice describing its policies and practices for the processing of Protected Personal Identifiers (PPI). This notice must include all the above listed additional privacy protections in its published Privacy Notice.

B. The HMIS Lead Agency has a sample privacy notice that describes the data uses and system-wide privacy protections. Agencies/jurisdictions may customize this sample, adding in the agency name and any additional uses or protections specific to the agency/jurisdiction.

C. Each participating agency/jurisdiction will establish or modify all necessary internal or external processes required to accommodate all the above listed additional privacy protections.

2.4 Need-based Access:

Policy:

Access to the Pierce County HMIS system will be based on need. Need exists only for staff who work directly with (or supervise staff who work directly with) clients or have data entry or data reporting responsibilities. Appropriate license access levels will correspond to staff’s need and use of data.

Procedure:

A. Each participating agency/jurisdiction will identify the specific staff members to obtain licensed access to the Pierce County HMIS system based on this policy and assist the Pierce County HMIS System Administrator in determining appropriate level of access.

2.6 Access Privileges to Pierce County HMIS Software:

Policy:

Each participating agency/jurisdiction staff member must be trained in both privacy and security procedures, and in specific software use to obtain licensed access to the Pierce County HMIS system. Licensed access to the Pierce County HMIS system may never be “shared” with another individual.

Procedure:

A. Each participating agency/jurisdiction will identify the specific staff members to obtain licensed access to the Pierce County HMIS system.

B. Each identified member must successfully complete the following:
   1. Pierce County HMIS Privacy and Security Certification training.

   2. Agree to all provisions of use by reading and signing the Pierce County HMIS Privacy Agreement. (See Appendix B)

   3. Agree to all provisions of use by reading and signing the Pierce County HMIS User Agreement. (See Appendix C)

   4. ServicePoint User Training or Pierce County HMIS agency administrator training.

C. Each user will create and maintain an independent and private password which will not be disclosed to anyone.

Participating Agency/Jurisdiction:

2.7 Breach of Confidentiality and/or Security:

Policy:

A breach of confidentiality and/or security by any agency/jurisdiction participant in the Pierce County HMIS system will result in consequences up to and including termination of user rights. An agency/jurisdiction that is found to have consistently and/or flagrantly violated confidentiality and/or security protocols may have their access privileges suspended or revoked.

Procedure:

A. Agency/Jurisdiction will notify Pierce County HMIS System Administrator within three (3) business days of any identified breach of security.

B. Pierce County HMIS System Administrator will review agency/jurisdiction data and discuss the situation with the agency/jurisdiction within three (3) business days. In addition, the Pierce County HMIS System Administrator will inform designated CoC staff about the issue and convey the relative seriousness of the breach.

C. Based on the seriousness of the breach of security and/or confidentiality, CoC staff will recommend an appropriate intervention to the Executive Committee of the HMIS Lead Agency .

D. A designated special committee of the HMIS Lead Agency, will decide whether a downgrading of system access, loss of user privileges, or other intervention is necessary.

D. Appeals may be made to the designated special committee of the HMIS Lead Agency.

E. Agency/jurisdiction is expected to make decisions about disciplinary action, up to and including termination, in accordance with agency/jurisdiction policies and values.

F. The Pierce County HMIS System Administrator will monitor access logs regularly and report suspicious activity to the Agency Administrator.

2.8 Revocation or Revision of Access Privileges:

Policy:

Other violations of system use protocols (other than breaches of confidentiality and/or security) may warrant revocation of user privileges, downgrading of access, and/or disciplinary action of specific end users by the agency/jurisdiction.

Procedure:

A. Agencies/jurisdictions should undertake disciplinary action with employees as appropriate and in accordance with agency/jurisdictional policies.

B. Agencies/jurisdictions must notify the Pierce County HMIS System Administrator with information about any violation(s) of the policies and procedures set forth in this document or any signed MOUs and/or signed Pierce County HMIS forms within three (3) business days of the identified incident(s) of misuse or abuse of Pierce County HMIS privileges.

C. Once notified by agency/jurisdiction of a violation, CoC staff will respond within fifteen (15) working days with appropriate discussions and/or intervention steps. Possible intervention steps, depending on the severity of the violation, include revocation of user privileges or downgrading of access rights.

D. All sanctions are imposed by the agency/jurisdiction and/or the HMIS Lead Agency 's designated special committee.

E. All sanctions imposed by the agency/jurisdiction can be appealed to the HMIS Lead Agency designated special committee (such as the System Grievance and Security Committee, see Section 10.1).

F. All sanctions imposed by the designated special committee following the disposition of the appeal are final and binding.

2.9 Participant Data:

Policy:

HUD prohibits predicating access and utilization of services on consent for entry into the HMIS. However, funders of certain programs may require that data be collected and electronically entered and maintained in order to provide services. CoC acknowledges this conundrum and lays out the following procedures to accommodate this discrepancy in the guidelines for
some programs.

Agency/jurisdiction may collect and store Client data in Pierce County HMIS without express written consent providing the following are completed:

- the data is stored within Pierce County HMIS such that it is inaccessible to other agencies,
- appropriate disclosure is included in the agency/jurisdiction's Privacy Notice, and
- clients receive and initial for receipt of the "What Is Pierce County HMIS ?" form.

2.10 Quarterly Compliance Review:

Policy:

Each participating agency/jurisdiction will conduct an annualmonitoring to review adherence to the Governing Principles and Policies and Procedures of the Countywide Pierce County HMIS system. A plan must be developed to correct any problems that are identified. HMIS Lead Agency staff or designees will periodically review participating agency/jurisdiction's annual monitoring to ensure system-wide compliance and adherence to Governing Principles and Policies and Procedures of the Countywide Pierce County HMIS system.

Procedure:

A. Agency/jurisdiction's annual monitoring will review privacy/confidentiality, data quality, and security, as follows:

1. Privacy/Confidentiality
   a) The agency/jurisdiction must review dataflow to insure all Privacy and Security requirements are met in obtaining and entering client data.
2. Data Quality
   a) Review system reports on completeness of required data.
   b) Determine that all definitions are being applied uniformly.
3. Security
   a) Review if all workstations are being updated regularly for virus protection.
   b) Review if system firewall is regularly updated
   c) Review handling of hardcopy versions of client data.
   d) Review disposal procedures (hard and soft copy) of client data.

Client Rights:

3.0 Decision to Participate:

Policy:

Clients have the right to specify if their personal information from the Standardized Intake may be shared in the Pierce County HMIS system. Clients can not be refused services if they choose not to share the Intake in Pierce County HMIS.

Procedure:

A. Each participating agency/jurisdiction will provide the information of its Privacy Policy document to any individual upon request.

B. Clients will be informed both verbally and in writing about what information is being collected and how the information will be used.

C. Clients will be informed both verbally and in writing about their options for participation in Pierce County HMIS.

D. If a client chooses to share their data, the client will sign the "Client Release of Information Authorization" form.

E. If a Client chooses to not share their data, the "Consent" section of the "Client Release of Information Authorization" form is not signed. All collected data may be entered into Pierce County HMIS, but must be secured appropriately to forbid any sharing. Client may not be denied services based on that choice. (RESEARCH ANONYMOUS FOR NON CONSENT AND DV and HiPPAA)

F. Client information may only be searched for or entered in the Pierce County HMIS system AFTER the client has been informed of data collection and use and the option for data sharing.

G. Reasonable accommodations will be made with regards to the Privacy Policy, release of information forms or access to information for persons with disabilities and non-English speaking clients as required by law.

3.1 Clients Affected by Domestic Violence:

Policy:

Victim Service Providers must not directly enter client level identifying data or provide client level identifying data into HMIS if they are legally prohibited from participating in HMIS and legal service providers may choose not to use HMIS if it is necessary to protect attorney-client privileges. Victim service providers and legal service providers that are recipients of funds requiring participation in HMIS but which do not directly enter data in an HMIS, must use a comparable data base.

Procedures:

For households that do not want their data entered into HMIS for any reason, including those with DV issues and those without DV issues: (RESEARCH ANONYMOUS CLIENT)

- all HUD Universal Data Elements and Program Specific Data Elements must still be captured by the provider.
- These data must be stored in a separate database (Excel, Access, or comparable application that allows for aggregation of the data to be sent to Pierce County in a format to be named by Pierce County) that meets the security requirements set out by the US Department of Housing and Urban Development, and/or the Washington State Department of Commerce.

HMIS Data Entry for Households with Domestic Violence Histories in non-Domestic Violence Housing Programs:

For Programs that do not have a primary focus of assisting those with histories of Domestic Violence (DV) HMIS entry should be given the following care:

- If a household is currently at any risk of being stalked or at risk of immediate violence they should be discouraged from signing the release of information to enter their personal data into the HMIS.
- If a household has a history of DV, but is not currently at risk of immediate violence or stalking, they should be informed of the risks associated with others seeing their data in the HMIS (County, State, and Federal staff). The benefits of having their data in the system should be part of the discussion (e.g., the ability of government to understand the full population of those accessing services, including those with histories of DV).
- No agency or program (that does not have a primary focus on DV) should automatically exclude data entry for 100% of those with DV histories. The decision needs to be fully informed, and made by the head of household.

3.1 Client Revisions to Participation:

Policy:

Clients have the right to specify when and how their personal information in the Pierce County HMIS system may be changed. Clients may revoke, revise, and/or amend their levels of data sharing at any time during the course of service use. Clients may not be refused services if they choose to modify their participation in Pierce County HMIS.

Procedure:

A. Each participating agency/jurisdiction will complete a new Release of Information authorization form each time a Client asks to share his/her data in Pierce County HMIS.

B. Each participating agency/jurisdiction will complete a new ROI form (NEED TO UPDATE ROI TO INCLUDE REVOCATION OF CONSENT) each time a Client requests to no longer share data in Pierce County HMIS.

C. Agency/jurisdiction will modify Client ROI in Pierce County HMIS within five (5) business day in accordance with Client's revised authorization.

Client Rights:

3.2 Client Access to Personal Information:

Policy:

Clients have the right to inspect and to have a copy of their personal information which is stored in the Pierce County HMIS system. Clients also have the right to request that information be corrected and/or updated.

Procedure:

A. At the reasonable written request of a client, each participating agency/jurisdiction will, within 5 working days, provide a printed copy of the client's Pierce County HMIS record.

B. The agency/jurisdiction will explain any information that the client does not understand.

C. Each participating agency/jurisdiction must consider any reasonable request by a client for correction of inaccurate, incomplete or removal of personal information pertaining to that client.

3.3 Filing Client Grievances:

Policy:

Clients have the right to file a grievance for denial of access to or correction of data in the Pierce County HMIS system, or if they believe their specific written release of information consent for the Pierce County HMIS system has been violated.

Procedure:

4. Client files a grievance as specified in the agency/jurisdiction Privacy Policy.

5. Agency/jurisdiction must review all grievances at all levels identified in the Privacy Policy.

6. If client is unsatisfied with the resolution at the agency level, the client may request mediation at the system level. Within five (5) working days, a copy of the grievance is sent to the HMIS staff member of the HMIS Lead Agency, who will review the grievance.

7. The HMIS staff sends written decision to the agency/jurisdiction and the client within thirty days.

Pierce County HMIS License Administration:

4.0 Issuing of User Licenses:

Policy:

The Pierce County HMIS System Administrator will issue all initial agency/jurisdiction user licenses for system users. The agency/jurisdiction Technical Administrator will administer user IDs and passwords for the eligible user at agency/jurisdiction site(s).

Procedure:

A. Upon completion of a signed User Agreement and Privacy and Security Certification, a system user will be eligible to be issued a license.

B. The Pierce County HMIS System Administrator will allocate a user access license and privileges to the user prior to Pierce County HMIS hands-on system training.

Passwords:

1) First-time, temporary passwords are automatically generated by the Pierce County HMIS system when a user is created. This temporary password must be changed the first time the user logs onto the system.

2) Pierce County HMIS User IDs and first-time, temporary passwords will be transmitted in two separate emails to the user.

3) NO SUBSEQUENT ELECTRONIC TRANSMISSION OF AUTHENTICATORS (PASSWORDS OR USER NAMES) MAY TAKE PLACE.

4) Passwords selected by users to replace the first-time, temporary password must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:

    a) Using at least one number and one letter;

    b) Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and/or

    c) Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.

5) Additional Licenses:

    a) If a participating agency/jurisdiction purchases additional user licenses to the Pierce County HMIS system, the above outlined Procedures will be followed.

6) The agency/jurisdiction Technical Administrator will administer any changes in issued licenses and user IDs and passwords for eligible users at their site.

4.1 User Licenses:

Policy:

A User issued licensed access to the Pierce County HMIS system may not share that access with any other person at any time. Sharing access is considered a breach of security and confidentiality and will result in consequences up to and including termination of user rights and potentially termination ofemployment as detailed in this manual.

4.2 Maintenance of User Licenses:

Policy:

Agency/jurisdictions' Pierce County HMIS Manager or Technical Administrator must notify the Pierce County HMIS System Administrator upon termination or extended leave of absence of any licensed Pierce County HMIS system user. User access will terminate at the end of business on their last day of employment or sooner if requested by the agency/jurisdiction Pierce County HMIS Manager. If a licensed user is to go on leave for a period of longer than 45 days, their access will be inactivated within 5 business days of the start of their leave.

Procedure:

A. The agency/jurisdiction Pierce County HMIS Manager or Technical Administrator will notify the Pierce County HMIS System Administrator by both email and phone of any user termination or extended leave from employment in sufficient time to comply with the above stated policy.

B. Failure to make such notifications in the time required will be considered a breach of confidentiality and will be grounds for suspending and/or revoking access of the agency/jurisdiction to the Pierce County HMIS system.

C. Such sanctions will be imposed by agency/jurisdiction and the HMIS Lead Agency 's Executive Committee.

Maintaining Pierce County HMIS Security:

5.0 Tracking of Unauthorized Access:

Policy:

The agency/jurisdiction Agency Administrator will track system access logs and audit reports monthly. The Agency Administrator will immediately notify the agency/jurisdiction Pierce County Systems Administrators of suspicious or inappropriate access. Pierce County program staff will review the access logs during the monitoring visits.

Procedure:

A. Upon discovery of suspicious or inappropriate access the agency/jurisdiction Agency Administrator, will investigate the specific situation and report back to the Pierce County HMIS Systems Administrators in writing.

B. If an infraction of security did occur, the agency/jurisdiction Agency Administrator will provide Pierce County HMIS Systems Administrators with a corrective plan for rectifying the infraction and monitoring against further such infractions.

C. Failure to follow the corrective plan can result in downgrading of license access.

D. HMIS staff will assist in creating a corrective plan to rectify infractions and monitor against further infractions.

5.1 Unauthorized Remote Access: DEBORAH WILL RESEARCH REMOTE ACCESS AND IP ADDRESSES WHAT ARE AGENCY POLICIES IT PEoPlE

Policy:

Access to the Pierce County HMIS system is allowed only from authorized agency locations. Remote access (from an unauthorized agency location) to the Pierce County HMIS system is not permitted under any circumstances. Such access is considered a breach of security and confidentiality and will result in consequences up to and including termination of user rights and potentially termination of employment as detailed in this manual. The Pierce County HMIS System Administrator will monitor access of the Pierce County HMIS system to ensure compliance with the access policy. Agencies/jurisdictions must monitor all staff to ensure such compliance.

Procedure:

A. In addition to the Pierce County HMIS Privacy and Security Certification Training, the agency/jurisdiction shall make this policy and its consequences known to all licensed users.

B. If a breach of security occurs, the agency/jurisdiction Pierce County HMIS Manager will provide CoC staff with a written notice and plan for rectifying the infraction and monitoring against further such infractions.

C. Agencies wishing to authorize remote workstations as a secure and compliant authorized agency location must submit a written request to the agency Technical Administrator who will physically inspect the remote workstation for security compliance as detailed in the HUD Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice. If remote workstations comply with the security standards, the Technical Administrator will complete the Authorized Remote Access Form and submit it to the Pierce County HMIS System Administrator.

D. An authorized remote site must be inspected by the Technical Administrator once a quarter to insure the firewall is functioning properly and the virus software is up to date. Each visit will be documented on an Authorized Remote Access Form and submitted to the Pierce County HMIS System Administrator.

E. HMIS Lead Agency staff or its designee may monitor the remote access inspection records from the agency/jurisdiction or Pierce County HMIS System Administrator.

5.2 Downloading of Data from Pierce County HMIS System:

Policy:

Pierce County HMIS aggregate data for an agency or system-wide must not contain any PPI and therefore does not require the highest levels of protection reserved for PPI. However, this aggregate data should be limited to authorized use and disclosure.

Data containing PPI (non-aggregated data) must always be stored in binary, not text, format. Agency/Jurisdiction may download data. However, to comply with the binary format, if an agency/jurisdiction chooses to download its data, it must download to common database applications that use a binary format which include Microsoft Access, Microsoft SQL Server, Oracle, or other appropriate databases. No data containing PPI may be downloaded to any unauthorized remote access site at any time for any reason.

Agency/Jurisdiction must never download data for clients not in its programs.

Downloaded data that includes PPI may not be stored on any network drive accessible to anyone not trained through the Pierce County HMIS Privacy and Security Training. If the data is stored on a portable medium (e.g. disks, CDs, tape), that medium must be securely stored when not in use and never left unattended in a public area. Such storage mediums may not be taken off site at any time for any reason.

Access to the downloaded data is restricted to persons successfully completing Privacy and Security Certification Training to maintain security standards.

Failure to follow this policy will be considered a breach of security and confidentiality and will result in termination of user rights. Agency/Jurisdiction is responsible for ensuring its data users' compliance with this policy.

Procedure:

A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy, and train and monitor all users.

5.3 Deleting of Data Downloaded from Pierce County HMIS System:

Policy:

In order to delete downloaded HMIS data containing PPI from a data storage medium, the agency/jurisdiction must reformat the storage medium a minimum of two (2) times before reusing or disposing of the medium. This is true for hard drives, floppy disks, zip drives/disks, tape backups, etc. To dispose of data stored on CDs, the CD must be physically destroyed.

If an agency/jurisdiction is not prepared to reformat a hard drive as specified to delete downloaded HMIS data containing PPI, the data should not be downloaded to that medium.

Procedure:

A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy, and train and monitor all agency/jurisdiction users.

5.4 Printing of Hard Copy Data:

Policy:

Hard copy data containing PPI may only be printed from the Pierce County HMIS system at the physical agency/jurisdiction location(s) and only on printers secured from public access.

5.5 Disposing of Hard Copy Data:

Policy:

An agency/jurisdiction is responsible for disposing of documents that contain PPI by shredding paper records.

Procedure:

A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy.

B. CoC staff and/or CoC/Pierce County HMIS consultants will periodically review agency/jurisdiction compliance with this policy in the course of monitoring agency/jurisdiction compliance with privacy and security standards.

5.6 Reported Data:

Policy:

Only aggregated data not containing any PPI will be released or reported outside of the agency/jurisdiction that collected or has access to such information.

Procedure:

A. A participating agency/jurisdiction shall only release or report de-identified aggregate data that does not contain PPI.

B. Failure to comply with this policy will result in the downgrading or suspension of license access to the Pierce County HMIS system.

5.7 Reporting Security Violations:

Policy:

If a security violation should occur, the agency/jurisdiction must notify the Pierce County HMIS System Administrator and CoC staff of the violation within 24 hours by email and phone.

Procedure:

A. A participating agency/jurisdiction shall establish printed procedures for implementing and complying with this policy.

B. Failure to comply with this policy will result in the downgrading or suspension of license access to the Pierce County HMIS system.

5.8 Virus Protection on User Systems:

Policy:

Each agency/jurisdiction will take all necessary precautions to prevent any destructive or malicious program (virus) from being introduced into their system that is used to access the Pierce County HMIS system. If a virus is introduced into the agency/jurisdiction system, the agency/jurisdiction must act rapidly to resolve the issue, including completing agency-/jurisdiction-wide security checks as appropriate.

Procedure:

A. A participating agency/jurisdiction shall adopt, if it has not previously, the following standards:

1) Industry-recognized Anti-Virus software will be installed and maintained in all user workstations.

2) No un-scanned media will be introduced to the system.
3) No downloading of internet programs/files will be permitted, except for necessary software or operating system updates issues by the manufacturer.

4) Individual workstation virus definitions will be updated weekly or more often when required.

5) Virus protection on all servers will be updated regularly.

6) System server(s) will be scanned daily.

7) Spyware that is included with Anti-Virus or firewall software should be loaded for added protection.

B. If infection does occur, NO ACCESS TO THE Pierce County HMIS SYSTEM WILL BE ALLOWED BY ANY USER UNTIL THE ENTIRE SYSTEM IS CLEANED AND DECLARED SECURE BY THE SYSTEM ADMINISTRATOR.

Maintaining Data Integrity:

6.0 Weekly Data Entry:

Policy:

Data entry by an agency/jurisdiction must take place, at minimum, on a weekly basis. Participating agencies/jurisdictions are responsible for assuring that the reportable HUD data is as complete and accurate as possible.

Procedure:

A. The Technical Administrator will run weekly custom reports to identify missing data elements required for HUD reporting.

B. The agency/jurisdiction will have established a procedure to address report results and enter missing data.

6.1 Monthly ROI Monitoring: ROI REVIEW

Policy:

A participating agency/jurisdiction will run a monthly report to identify upcoming ROI expiration dates for active client records in the Pierce County HMIS system. Staff will make all reasonable efforts to obtain a new ROI and enter in the Pierce County HMIS system prior to the expiration of the existing ROI.

Procedure:

A. The Technical Administrator will run a monthly report to identify active clients with an ROI expiring in the next month for all programs that operate at least three times per week except Shelter Plus Care.

B. The Technical Administrator for Shelter Plus Care and all programs operating less frequently than three times per week will run a monthly report to identify active clients with an ROI expiring in the next two months to allow ample time to secure renewal of ROI.

C. The agency/jurisdiction will have established a procedure to obtain new ROIs from these active clients and enter the new ROI information into the Pierce County HMIS system prior to the expiration of the existing ROI.

6.2 Previously Obtained Data without an ROI:

Policy:

If an agency/jurisdiction possesses a current ROI on an active client, historical data may be entered for the program year.

If no current ROI is possessed, agency/jurisdiction may enter client data and close it to others in limited circumstances with the set-up and permission from the System Administrator. Entry of such data needs to be completed correctly to minimize risk to the Pierce County HMIS and secure other system data for HUD mandated homeless counts.

Agency/jurisdiction is responsible for the costs of manual of historical data.

Procedure:

A. The System Administrator must approve all agency/jurisdictions seeking to enter historical data.

Training:

7.0 Privacy and Security Certification Training:

Policy:

Any agency/jurisdiction staff or designees conducting any intake, data entry, or other data processing functions must complete Privacy and Security Certification Training and become certified. Upon initial implementation of an agency/jurisdiction, Privacy and Security Certification Training will be provided by CoC staff. All subsequent Privacy and Security Certification Training of new agency/jurisdiction staff for the Pierce County HMIS system will be completed by either attending a HMIS Lead Agency -sponsored Certification Training or by one-on-one training sessions conducted by the agency/jurisdiction's Pierce County HMIS manager or Policy and Procedure Administrator using Tacoma/Lakewood/Pierce County Continuum of Care HMIS Lead Agency -provided Training and Certification materials. The HMIS Lead Agency -sponsored Privacy and Security Certification Trainings, conducted by CoC staff, will occur regularly, and will be open to all new agency/jurisdiction staff.

Procedure:

A. Upon initial implementation, agency/jurisdiction will identify all relevant staff, volunteers, interns, and contractors who must complete Privacy and Security Certification training and submit the list of names to the System Administrator upon request.

B. CoC staff will schedule and provide Privacy and Security Certification training to all initial Pierce County HMIS users and intake staff.

D. Upon completion of the Privacy and Security Certification Training, the HMIS Lead Agency will notify the Implementation Team Lead and agency executive director/jurisdictional lead staff of the certification status of its staff. Certification will be mailed for staff successfully completing the Privacy and Security Certification.

D. Staff who do not successfully complete the Certification (by failing to pass the Certification test) will be rescheduled into a future Privacy and Security Certification Training.

E. Upon completion of initial implementation, CoC staff will provide the agency/jurisdiction Policies and Procedures Administrator with a master set of training materials to be used (copied) for subsequent Privacy and Security Certification Training of new agency/jurisdiction staff.

B. CoC updates made to Privacy and Security Certification Training materials will be sent to the agency/jurisdiction Policies and Procedures Administrator.

C. The agency/jurisdiction Policies and Procedures Administrator must sign-off on the successful completion of Privacy and Security Certification Training for each new user trained by the agency/jurisdiction. The Policies and Procedures Administrator will provide verification to the Pierce County HMIS System Administrator, including the names and contact information of all individuals who completed the Privacy and Security Certification Training, a completed Certification test, and a signed Privacy Agreement. HMIS Lead Agency staff will correct the test and complete the Certification before a user access license to the Pierce County HMIS system will be issued.

D. The agency/jurisdiction Policies and Procedures Administrator must sign-off on the successful completion of any supplemental Privacy and Security Training conducted by the agency/jurisdiction for users and provide such verification to the Pierce County HMIS System Administrator, including the names and contact information of all individuals who completed supplemental Privacy and Security Training.

WEBINAR Training/Video for Renewal… Current users will receive training with implementation of PP

7.1 ServicePoint User Training:

Policy:

Upon initial implementation of an agency/jurisdiction, HMIS Lead agency staff will provide ServicePoint User Training. All subsequent ServicePoint User Training of new agency/jurisdiction staff for the Pierce County HMIS system will be completed by attending a HMIS Lead Agency -sponsored ServicePoint User Training. The HMIS Lead Agency sponsored ServicePoint User Trainings, conducted by CoC staff, will occur regularly, and will be open to all new agency/jurisdiction staff. In addition, the HMIS Lead Agency will convene future user trainings to address large system-wide topics, such as new ServicePoint modules or major software upgrades.

Procedure:

A. Upon initial implementation, agency/jurisdiction will identify relevant staff, volunteers, interns, and contractors who must complete ServicePoint User Training and submit the Registration Form to the System Administrator upon request.

B. CoC staff will schedule and provide ServicePoint User Training to all initial Pierce County HMIS users.

D. The Pierce County HMIS System Administrator must sign-off on the successful completion of ServicePoint User Training for each new user and provide such verification to the agency/jurisdiction Technical Administrator before a user access license to the "live" Pierce County HMIS system will be issued.

Training:

7.2 ServicePoint AdministratorTraining:

Policy:

Upon initial implementation of an agency/jurisdiction, ServicePoint Administrator training will be provided by CoC staff.

Should a change occur in the staffing of the Agency Administrator role at an agency/jurisdiction, the agency/jurisdiction will confer with the Pierce County HMIS System Administrator as to the plan for training the new Agency Administrator.

Procedure:

D. Upon determination of a change of Agency Administrator at an agency/jurisdiction, the agency/jurisdiction will notify the Pierce County HMIS System Administrator of the upcoming change.

Reporting:

8.0 Agency/Jurisdiction Reporting Technology Solutions:

Policy:

CoC staff and consultants will continue to secure appropriate reporting technology, software and training for Pierce County HMIS partner agencies such that agency/jurisdiction can internally generate agency-specific and some system-wide reports.

8.1 Agency/Jurisdiction APR Reporting:

Policy:

An agency/jurisdiction can generate its own program's APR reporting using the Pierce County HMIS ServicePoint software.

8.2 Agency/Jurisdiction Custom Reporting:

Policy:

Agencies/jurisdictions are responsible for their own custom reporting of agency/program data. It is the goal of the CoC to provide additional custom reporting options to agencies and jurisdictions.

8.3 Reports for Collaboratives:

Policy:

A reporting solution for collaborative grants currently resides with the Pierce County HMIS System Administrator who can prepare collaborative reports at the agency/jurisdiction's request.

8.4 System-wide Reporting:

Policy:

The HMIS Lead Agency will generate annual and periodic data for public use.

Pierce County HMIS System Maintenance/Upgrades:

9.0 Upgrading ServicePoint Software:

Policy:

Periodically it will be necessary to upgrade ServicePoint software. This upgrade will be done by Bowman Internet Systems, the software vendor. The Pierce County HMIS System Administrator will coordinate system upgrades with Bowman Systems and make the necessary notifications to all participating users.

Procedure:

D. System software upgrades will be scheduled in advance and notification will be made to all participating users via the ServicePoint System News and notification to agency/jurisdiction Technical Administrators. Every effort will be made to minimize system downtime.

Pierce County HMIS System Governance and CoC Roles and Responsibilities:

10.0 System Governance and Oversight:

Policy:

The Tacoma/Lakewood/Pierce County Continuum of Care HMIS Lead Agency will provide system governance and oversight of policies, procedures, and significant concerns about the Pierce County HMIS system. Issues affecting the entire user system or large population segments will be vetted in appropriate community-wide forums which may include HMIS Agency Administrator meetings, focus groups, or public comments periods.

Procedure:

A. CoC HMIS Lead Agency staff and consultants will identify the most appropriate forum from which to solicit comment and input about policy decisions and implementation documents.

B. Staff will publicize and invite relevant parties and specify the scope of conversation/comments and the length of the comment period.

C. Revisions of this Policy and Procedures document may be necessary from time to time. Supplemental and/or replacement pages may be distributed.

D. The HMIS Lead Agency will approve revisions to the Policies and Procedures contained in this document, this document as amended, and any other documents that establish policy.

E. Appeals to published policies and procedures after the comment period may be made by any party to the HMIS Lead Agency. Appeals must be in writing and will then be scheduled for review by a special committee.

Pierce County HMIS System Governance and CoC Roles and Responsibilities:

10.2 Right to Deny Access:

Policy:

The access of a participating agency/jurisdiction and/or user(s) may be suspended for suspected violation of security protocols. The access of a participating agency/jurisdiction and/or user(s) may be suspended or revoked for actual violation of security protocols.

10.3 CoC Roles and Responsibilities:

HMIS Lead Agency

The HMIS Lead Agency will provide oversight and governance, including financial oversight, and ensure that Pierce County HMIS is implemented in a consistent manner

1. Approve annual budget for Pierce County HMIS, including staffing.

2. Approve the annual Pierce County HMIS workplan

3. Approve contracts and principal documents.

4. Receive and review monthly written financial reports.

5. Receive and review monthly written reports on progress and issues.

AGENCY/JURISDICTIONS

The AGENCY/JURISDICTION will provide input to community-wide or population-specific policy level decisions affecting the full implementation.

1. Receive regular e-mail updates on Pierce County HMIS developments, major issues, implementation schedule and progress.

2. Provide input through email/mail reviews of Pierce County HMIS documents and implementation process.

3. Participate in forums as requested.

CoC Staff

The CoC staff and/or project-based consultants will manage and oversee the entire Pierce County HMIS implementation and on-going operations.

1. Prepare annual Pierce County HMIS budget for HMIS LEAD AGENCY Committee approval.

2. Prepare the annual Pierce County HMIS work plan.

3. Prepare contracts and documents.

4. Prepare monthly written financial reports.

5. Prepare monthly written reports on progress and issues and annual reports including budget, project status, and work plan.

6. Distribute Pierce County HMIS documents and implementation processes for review.

7. Arrange and staff regular HMIS forums.

8. Develop Pierce County HMIS configuration, implement and operate the Pierce County HMIS system on a day-to-day basis, including providing training and technical assistance.

9. Maintain relationship with the software vendor, negotiate any contractual changes and provide significant input on proposed software solutions.

10. Work with participating agencies.

11. Work with the federal Department of Housing and Urban Development (HUD) to ensure Pierce County HMIS meets all relevant federal mandates and is in accordance with HUD HMIS priorities.

12. Work with and coordinate with Bay Area Counties and other HMIS interested groups.

Pierce County HMIS System Governance and CoC Roles and Responsibilities:

10.3 CoC Roles and Responsibilities: (continued)

Pierce County HMIS System Administrator

The Pierce County HMIS System Administrator will manage the day-to-day software application, oversee the agency-specific implementation and compliance, and liaison between the agency/jurisdiction and the software vendor.

1. Perform initial agency setup and configuration within the system.
2. Administer and manage user accounts, logins and passwords for local agency administrators.
3. Update training modules (including training materials) for agency administrators.
4. Provide technical assistance within the continuum and facilitate trouble-shooting and problem resolution.
5. Perform data quality review on an ongoing basis.
6. Review and monitor across user agencies to ensure security, confidentiality and quality of the information within the system and adherence to standard policy and procedures.
7. Coordinate and manage all system upgrades with the software vendor and users.
8. Create and run all required custom and collaborative reports.
9. Liaison with system software vendor to resolve technical issues.

Work Flow Procedures:

11.0 Data Element Definitions:

2013 HUD DATA STANDARDS

11.1 Client Search Prior to Intake:

Policy:

Prior to conducting an Intake for a new program entry, staff of each participating agency/jurisdiction will obtain the Client Profile. Agency/jurisdiction staff will verify the information and then conduct the remaining Intake questions with the client.

Procedure:

A. Staff of each participating agency/jurisdiction will, prior to conducting an intake, log into Pierce County HMIS and search for the client.

B. The agency/jurisdiction staff will then review the details with the client to insure accuracy and complete any unanswered questions.

C. The agency/jurisdiction staff will then complete the remaining Intake sections or forms for each new Intake.

D. Should the client not be found to exist within Pierce County HMIS, the agency/jurisdiction staff should contact the referring agency to unlock the complete household. If there is not a referring agency, the agency/jurisdiction staff should create a new household.

11.2 Entry Procedures:

Policy:

Every household member receiving any type of service (e.g., a meal, a bed, any type of counseling, medical services, housing, or any other service) must have a completed intake and be entered into the Pierce County HMIS system.

Procedure:

First ask the question as printed on the Intake form. If the client is unsure of what is being asked, restate the question, as needed, to insure understanding.

11.3 Update Procedures:

Housing Assessment Policy:

Every housing change for a household must be recorded and entered into Pierce County HMIS.

Procedure:

A. The Housing Status will beupdated by agency/jurisdictions staff each time a household moves in or out of permanent housing.

B. Data entry will follow the Pierce County HMIS Policy and Procedure expectation of once per week.

Annual Update Policy: Replace with HUD standards for recertification

Every client that is in a program one year or longer must have his/her record annually updated with information prescribed by HUD and this community, which minimally includes income, non-cash benefits, and disabilities.

Procedure:

A. Each agency/jurisdiction will run the Annual Update Report (ART) to generate a list of clients in need of an Annual Update. Clients will appear on the ART report if they have not had a new program entry or update (by any other agency) within the last twelve months.

B. Each agency/jurisdiction will complete a new Release of Information (v. 5.1) and Annual Update for each client who appears on the Annual Update Report. The Annual Update will be completed annually for each client.

C. The agency/jurisdiction will enter an Annual Update service, in Pierce County HMIS , on the Head of Household's record. When entering the service, also select any other family members that received the service at the same time as the Head of Household.

D. The Annual Update service will be entered for the program that performed the Annual Update and/or collected the data.

11.4 Exit Procedures:

11.5 Exit Dates:

Policy:

The exit must be dated back to the date of last contact for every client exit.

Appendices:

Appendix A – Agency/Jurisdiction Participant Agreement (MOU)

Appendix B – Privacy Agreement

Appendix C – User Agreement

Appendix D – HUD Final Data Standards

Appendix E – HUD HMIS Privacy and Security Standards – Summary

Appendix F – Sample Privacy Notice

Appendix G – Client Release of Information Authorization

Appendix H – HUD HMIS Required Data Elements List

Appendix I – Glossary