Comparable Database
Policies & Procedures Manual

MEMPHIS/SHELBY COUNTY CONTINUUM OF CARE

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

Purpose

This document provides the policies, procedures, guidelines, and standards that govern the Memphis/Shelby County Continuum of Care (CoC) Comparable Database (CDB) Partnering Agencies for contributing data to the HMIS. The HMIS Staff will provide each CDB Member Agency provider with a copy of this document. As a condition of participation, each CDB Member Agency is asked to adhere to all policies and referenced attachments within the document as signed in the HMIS CDB Memorandum of Agreement (MOA).

Exceptions

In order to mitigate risk from participation in the CDB HMIS system, the leadership has the right to grant exemptions to any HMIS policy only in the following instances:

1. Unique circumstances/projects not encountered before by HMIS staff;
2. Public policy decisions needing consideration; and
3. When sensitive timelines must be adhered to.

   No other instances will be considered.

Acknowledgements

The HMIS staff of Memphis/Shelby County would like to thank its many statewide and national colleagues who have shared their policies with us, while in development of this document. We would also like to thank the HMIS Member Agencies and local community planners for their thoughts, ideas, and work to help draft and revise this document.

Revision History

Date	Version	Revision
7/1/2023	1.1	Manual has been reformatted and updated according to current HMIS Lead Agency practices.

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

Table of Contents

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

Section 1: CDB HMIS Overview and Background

HMIS Introduction

The concept of Homeless Management Information Systems (HMIS) was a brainchild of the United States Congress and the Department of Housing and Urban Development (HUD). In 1999, Congress mandated the Department of Housing and Urban Development (HUD) find a way to adequately track the scope of homelessness in the United States in the HUD Appropriations Act. The following year, HUD mandated that each community implement or be in the process of implementation of a HMIS by October 2004. HMIS is a secure web-based centralized database where non-profit organizations across our community enter, manage, share, and report information about the clients that they serve. It is similar to an electronic health record system in a hospital. The HMIS staff provides training and technical assistance to HMIS Member Agency providers and their users.

Senate and House Appropriations Committee reports have reiterated Congress' directive to HUD to:

- Assist communities in implementing local HMIS, and
- Develop a Longitudinal System Analysis (LSA) that is based on HMIS data from a representative sample of communities.

Most recently, Congress renewed its support for the HMIS initiative and the LSA in conjunction with the passage of the Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act of 2006 (PL 109-115). In addition to Congressional direction HUD, other federal agencies and the U.S. Inter-agency Council on Homelessness requires HMIS under various statutory authorities and Congressional direction to collect information about the nature and extent of homelessness. Individual projects authorized under the McKinney-Vento Act require the assessment of homeless needs, the provision of services to address those needs, and reporting on the outcomes of federal assistance in helping homeless people to become more independent. The major congressional imperatives in HUD's McKinney-Vento Act projects are:

- Assessing the service needs of homeless persons;
- Ensuring that services are directed to meeting those needs;
- Assessing the outcomes of these services in enabling homeless persons to become more self-sufficient; and
- Reporting to Congress on the characteristics of homeless persons and effectiveness of federal efforts to address homelessness.

Comparable Database Introduction

A comparable database has been developed as a separate, but more secure, "instance" of the standard HMIS system. It exists to allow victims of domestic violence to engage in HUD-funded housing opportunities without their identity or locations being shared across the broader COC. The Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that limit Victim Service Providers from sharing, disclosing, or revealing victims' personally identifying information (PII), including entering information into shared databases like HMIS. To protect clients, VSPs must enter HUD's required client-level data into a comparable database that complies with all HMIS requirements but. These policies and procedures mirror those of the standard HMIS manual. Differences will be outlined in the relevant sections below.

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

HMIS Project Goals

Goal One

Inform public policy makers about the extent and nature of the homeless population in our community. This is accomplished through analysis of homeless client and service provider data. HMIS gathers an unduplicated count of those accessing services, service trends, bed utilization rates, re-entry rates, and HMIS system usage. All data is provided in an aggregated (void of any identifying client level information) format and made available to public policy makers, service providers, advocates, and consumer representatives.

Goal Two

Streamline the intake and referral process for human service agencies in the community. HMIS provides a standardized mechanism for collecting client information across all providers. Human service providers collect the same client information, and then the client can share that information at each project with additional service providers for greater ease of service. A service provider can send an electronic referral to another agency as part of the system. This streamlined process (Coordinated Entry) allows for the development of centralized, coordinated assessment centers where agencies can store assessments, refer clients to other projects, and follow clients longitudinally with a shared information system.

Goal Three

Allows for in-depth case management by sharing client information in a centralized system. HMIS provides a standardized mechanism in which human service providers collect information and then share it among every participating human service agency to assist clients more efficiently and effectively.

Goal Four

Inventory homeless housing options in the community. HMIS captures this inventory and allows real-time collection and tracking of emergency shelter, transitional housing, and permanent supportive housing.

Section Two: HMIS Lead Agency Roles & Responsibilities

Roles

The Community Alliance for the Homeless (CAFTH) is to act as the Homeless Management Information System (HMIS) Lead Agency for the community. In addition to acting as the HMIS Lead Agency, the role of the HMIS Lead Agency is to provide training and technical support to HMIS Member Agency providers. Lastly, the HMIS staff coordinates and participates in numerous projects annually regarding data collection and performance measurement. All roles and responsibilities apply to the comparable database as well as the larger HMIS system.

Responsibilities
HMIS Staff is responsible for coordinating the following items on behalf of HMIS Member Agencies:

- All software-related issues to the software vendor - This includes all communication with the vendor, including phone, email, and conferences. As well as submitting feature enhancement requests from HMIS Member Agencies.
- User training - HMIS staff is responsible for all End User training. This is to ensure continuity and consistency with training and the proper workflow for HMIS Member Agencies.
- Technical support related to the software or project - HMIS staff is responsible for providing technical support to Agency Administrators and End Users. Technical support services attempt to help the user solve

specific problems with a product and do not include in-depth training, customization, reporting, or other support services.

- Data quality initiatives – Together, Member Agencies and HMIS staff work diligently on adhering to data quality standards to ensure that reports at the provider and system levels are complete, consistent, accurate, and timely.
- System-wide reporting on performance measures for local, state, and national initiatives - HMIS staff train HMIS Member Agencies on how to access and run reports on the data they contribute to the HMIS. Additionally, reports are provided to local community planners monthly and statewide and national partners quarterly and annually. These data are in an aggregate format and detail the trends on how clients are served in the community.
- HMIS Staff coordinates and/or participates in numerous projects annually that include but are not limited to data collection and reporting.

Annual Projects and Reports

The Longitudinal Systems Analysis (LSA) Report

A critical aspect of the McKinney-Vento Homeless Assistance Act, as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community.

The Longitudinal Systems Analysis (LSA) report, produced from a CoC's Homelessness Management Information System (HMIS) and submitted annually to HUD via the HDX 2.0, provides HUD and Continuums of Care (CoCs) with critical information about how people experiencing homelessness use their system of care. This page provides guidance for CoCs about how to use and interpret their LSAs as well as for HMIS software providers about how to program the report. HUD does not currently support LSA submissions for comparable databases alongside HMIS systems, but may come to do so in the future.

Grant Inventory Worksheet (GIW)

Provide CoCs and Field Offices with information about CoC program grants that are eligible for renewal in the upcoming competition.

ESG Consolidated Annual Performance and Evaluation Report (CAPER)

Recipients with HUD funding received through the Emergency Solutions Grants (ESG) Program are required to submit a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD annually. Data collection for the ESG portion of the CAPER is aligned with the most recent version of the Homeless Management Information System (HMIS) Data Standards.

HOPWA Consolidated Annual Performance and Evaluation Report (CAPER)

The CAPER report for HOPWA formula grantees provides annual information on program accomplishments that supports program evaluation and the ability to measure program beneficiary outcomes as related to: maintain housing stability; prevent homelessness; and improve access to care and support.

Housing Inventory Count (HIC)

Continuum of Care (CoC) Homeless Assistance Programs Housing Inventory Count Reports provide a snapshot of a CoC's HIC, an inventory of housing conducted annually during the last ten days in January, and are available at the national and state level, as well as for each CoC. The reports tally the number of beds and units available on the night designated for the count by program type. They include beds dedicated to serving persons who are homeless and persons in Permanent Supportive Housing.

Homelessness Pulse

Generated quarterly , this report, similar to the AHAR, provides real-time information on service usage and trends to the Department of Housing and Urban Development.

Point in Time (PIT)

A snapshot of the homeless population taken on a given day. Since 2005, HUD has required all CoC applicants to complete this count every other year in the last week of January. This count includes a street count and a count of all clients in emergency and transitional beds.

COVID-19 Response

HMIS Database serves as the placeholder for COVID 19 rapid test results and COVID 19 vaccination verification.

Emergency Solutions Grants- Cares Act (ESG-CV)

The CARES Act appropriated $4 billion through the Emergency Solutions Grants Program "to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus under the Emergency Solutions Grants program (42 U.S.C. 11371)."

HUD requires each recipient of this ESG allocation, referred to as ESG-CV, to submit reports quarterly. ESG-CV recipients will submit their reports through the Sage HMIS Reporting Repository. Detailed information on creating user accounts, generally working in Sage, and completing CSV HMIS data reporting is found in the ESG CAPER Guidebook accessible through the HUD Exchange and via the RESOURCES tab in Sage. Reports will be due 30 calendar days after the quarter ends.

SAGE and Annual Performance Reports (APR)

SAGE is HUD's new reporting system for the submission of its Continuum of Care (CoC) Program Annual Performance Report (APR). Effective April 1st, 2017, the new system, Sage Homeless Management Information System (HMIS) Repository, will now be the portal for all CoC Program recipients to submit their APR to HUD. The Annual Performance Report (APR) provides annual performance reporting on client outputs and outcomes that enables an assessment of grantee performance in achieving the housing stability outcome measure. The APR fulfills statutory reporting requirements and provides the grantee and HUD with the necessary information to assess the overall performance and accomplishment of the grantee's program activities under the approved goals and objectives.

Section Three: CDB Member Agency Roles & Responsibilities

"HMIS Member Agency" is the term given by the HMIS or DB staff to reference participating healthcare and/or human service providers who actively enter data into the HMIS systems.

Participation Requirements Policy 3.1:

A qualified CDB Member Agency is required to sign and abide by the terms of the CDB Member Agency Agreement and the HMIS-CDB Policies and Procedures.

Procedure 3.1:

Any organization that provides a health and human service may qualify to participate in HMIS-CDB. To participate

in HMIS-CDB, Member Agencies must sign and agree to abide by the terms of the CDB Member Agency Agreement. They must also abide by the policies and procedures outlined in this document as well as the End User Agreement. All Member Agencies which receive funding from the United States Housing and Urban Development Department (HUD) are mandated to participate in HMIS by contract. Per HUD restrictions, Victim Service Providers must participate in a comparable HMIS database. For other agencies, participation is voluntary and strongly encouraged by the local CoC.

Initial HMIS Staff Site Visit Policy 3.2:

Before signing any HMIS agreements, a prospective HMIS Member Agency will first schedule and complete an on-site or virtual Initial HMIS Site Visit at the prospective Member Agency.

Procedure 3.2:

Before signing the Agreements for participation, a prospective HMIS-CDB Member Agency provider will first schedule and complete an initial site visit at the prospective Member Agency. This site visit is between the HMIS staff, the prospective HMIS-CDB Member Agency Executive Director, and other HMIS-CDB Member Agency critical staff at the prospective HMIS-CDB Member Agency location. Other staff may include data entry staff, supervisors, managers, intake workers, or case managers. The prospective HMIS-CDB Member Agency should include any staff they feel necessary to perform data entry, data quality or the reporting process. At this site visit, HMIS staff will document the goals of the prospective HMIS-CDB Member Agency in regards to HMIS (what do they want to achieve by using the system), go over the required data elements, review the CDB Policies and Procedures, define entry requirements and set expectations. The site visit also allows HMIS staff to properly assess the prospective HMIS-CDB Member Agency providers' work flow and user needs, specific implementation issues, and any constraints or risks that will need to be mitigated by the prospective HMIS-CDB Member Agency before going live. A site demo using a training version of the HMIS system may also be used (at HMIS staff discretion) during the visit to explain HMIS-CDB and its capabilities visually.

Minimal Technical Requirements Policy 3.3

All HMIS End User workstations must meet minimum technical requirements for functionality and required security specifications.

Procedure 3.3:

The following details are the minimal technical requirements for hardware and internet connectivity to the HMIS system:

- HMIS works with all operating systems (Mac Users should use the latest operating system).
- Hardware: Laptop, Tablet, or Workstation with Internet Connectivity: (High-Speed Internet) either wireless or connected through an ethernet network (LAN).
- System requirements for the hardware are Windows 8, and Windows 10 (prefer the latest operating system for best results).
- Authorized Browsers: Firefox (latest version), Internet Explorer (latest version), Safari (latest version), or Google Chrome (latest version), and EDGE (latest version).

CDB Member Agency Agreement Policy 3.4:

The CDB Member Agency Agreement must be signed by an authorized representative of each HMIS Member Agency. The CDB Member Agency Agreement is a legal contract between the CDB Member Agency and the HMIS Lead Agency regarding specific HMIS-CDB guidelines and use. The agreement outlines specific details about the CDB

Member Agency providers' HMIS involvement including, but not limited to, the areas of confidentiality, data entry, security, data quality and reporting. The CDB Member Agency Agreement will be updated annually or at the discretion of the HMIS Lead Agency if changes or updates need to be made to the Agreement.

Procedure 3.4:

The Agency's Executive Director (or authorized officer) will sign two copies of the CDB Member Agency Agreement and mail them to the HMIS Lead Agency. Upon receipt of the signed agreement, it will be signed by the HMIS Lead Agency director. One copy of the CDB Member Agency Agreement will be scanned and filed as a hard copy and electronically with the HMIS Lead Agency. The original copy will be mailed back to the HMIS Member Agency.

Member Agency Administrator Roles and Requirements Policy 3.5:

For a Member Agency with more than five employees and licensed end users, the Member Agency will assign an Agency Administrator and a backup Agency Administrator to coordinate HMIS activities for their organization.

Procedure 3.5:

The Executive Director (or authorized officer) of the Agency will complete the Agency Administrator/POC Designation Form to assign the position to a specific staff person. This role is vital to the success of HMIS at the CDB Member Agency locations. This practice will ensure that the data is entered in a timely manner, the quality of the data is continuously monitored, and communication and support between CDB and the CDB Member Agency is streamlined. An Agency Administrator is the staff member at a CDB Member Agency provider who acts as the centralized contact for the HMIS staff.

Agency Administrator Roles and Responsibilities

The Agency Administrator role is to act as the operating manager and liaison for the CDB system at the CDB Member Agency. This position is required for any Member Agency with five or more active licenses. They are responsible for the following items:

- Adhere to and enforce the CDB Policies and Procedures.
- Attend at least one Agency Administrator Training.
- Maintain current user license in the system by completing the certification assignments within 5 days of training and login to the system at least once every 15 days.
- After 15 days of inactivity, helpdesk will deactivate the user licenses. Staff will have a grace period of 15 days to reach out to our helpdesk and log into the system before the license is revoked.
- Communicate and authorize personnel and security changes for CDB End Users to CDB Staff within 24 hours of a change.
- Act as the first tier of support for CDB End Users.
- Authorize CDB End Users by completing the CDB End User Request Form prior to trainings.
- Ensure client privacy, security, and confidentiality for clients.
- Enforce CDB End User Agreements.
- Ensure the CDB Privacy Notice is posted in a visible area of the Agency and communicated in a language understandable by clients.
- Enforce data collection, entry, and quality standards.
- Ensure a basic competency with running HMIS-CDB system reports and have an understanding of

system wide data quality reports.
- Ensure Agency and all users are using the correct HMIS-CDB related forms and following the most current HMIS procedures and workflow.
- Attend all HMIS-CDB required meetings and conference calls.
- Assist with HMIS-CDB projects as needed (LSA, PIT, HIC, CAPER, ESG-CV, and PULSE) Schedule/Authorize HMIS End User Training.
- Inform HMIS Staff of all project changes within at least five business days prior to the change.

Member Agency Point of Contact Roles and Requirements Policy 3.6:

For Member Agencies with less than five employees and licensed end users, an Agency Administrator is not required, but at least one CDB Point of Contact (POC) is required to communicate with the HMIS staff.

Procedure 3.6:

The Executive Director (or authorized officer) of the Agency will complete the HMIS Partner Agency Contact Update form to assign the position to a specific staff person. This role is vital to the success of HMIS-CDB at the CDB Member Agency locations. This practice will ensure that the data is entered in a timely manner, the quality of the data is continuously monitored, and communication and support between HMIS and the CDB Member Agency is streamlined. A POC is the staff member at a CDB Member Agency provider who acts as the centralized contact for the HMIS staff.

Agency Point of Contact Roles and Responsibilities

The Point of Contact role is very similar to the Agency Administrator role, but without the technical support aspect. The HMIS staff will fulfill the role of help desk support and triage. A Member Agency should designate a primary and a back-up Point of Contact. The CDB Point of Contact is responsible for the following items:

- Adhere to and enforce the HMIS-CDB Policies and Procedures.
- Enforce CDB User Agreements.
- Ensure client privacy, security, and confidentiality.
- Communicate and authorize personnel/security changes for CDB End Users to HMIS Staff within 24 hours of a change.
- Authorize CDB End Users by completing the CDB End User Request Form prior to trainings.
- Ensure agency and all users are using the correct HMIS-CDB related forms and following the most current HMIS-CDB work flow.
- Inform HMIS Staff of all project changes with at least five business days prior to the change.
- Ensure the HMIS Privacy Notice is posted in a visible area of the Agency and communicated in a language understandable by clients.
- Attend all HMIS-CDB required meetings and conference calls.
- Assist with HMIS-CDB projects as needed (LSA, PIT, HIC, CAPER and PULSE).

Member Agency Staff End User Policy 3.7:

CDB Member Agency will ensure that at least one person will complete training in order to receive a license to access live client data in CDB.

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

Procedure 3.7:

Once the Agency Administrator/Point of Contact position has been assigned, she or he will be able to work with HMIS Staff to assign End Users and authorize additional licenses for the CDB Member Agency. The End User will complete training and then be responsible for the timeliness of the data being entered and the quality, integrity, and accuracy of the data they enter. Licenses are transferable and the fee is an annual fee.

An End User is a term used to refer to all HMIS users at a HMIS or CDB Member Agency. Every HMIS-CDB End User must attend at least one training session and sign a CDB End User Agreement. The End User Agreement will be signed upon first login to the CDB and kept on file with the Lead HMIS Agency.

Member Agency Staff End User Roles and Responsibilities

Every CDB End User is responsible for the following items:

- Adhering to all of the Policy and Procedures outlined in this document.
- Attending all trainings required by HMIS staff and the CDB Member Agency Administrator.
- Entering quality data in a timely and accurate manner.
- Adhering to the data requirements set by the HMIS staff and the HMIS Member Agency.
- Adhering to all privacy and security requirements.

Laptop/Tablets/Workstation Maintenance

Workstations should have their caches refreshed on a regular basis to allow for proper speed and functionality. Your device can be set to perform this function automatically in your browser setting after each session is closed. Laptops/Workstations may need their virtual memory increased. Laptops/Workstations must maintain sufficient virus protection to prevent downtime for maintenance. Regular system maintenance and updates should be applied.

HMIS-CDB Data Usage Policy 3.8:

CDB Member Agency providers will not violate the terms of use of data within the CDB system:

- CDB Member Agency providers shall not use any data within CDB to solicit clients, organizations, or vendors for any reason.
- CDB Member Agency providers shall not sell any CDB client, organization, or vendor data for any reason.

Procedure 3.8:

CDB Member Agency providers will not breach system confidentiality by misusing CDB data. CDB data is not to be used for any purpose outside the use of case management, project evaluation, education, statistical, and/or research purposes.

At no time shall confidentiality of clients, organizations, or vendors be violated by disclosing client information to non-members. Data in CDB will not be used to solicit for volunteers, employees, or clients of any type. This information must not be sold, donated, given, or removed from CDB for any purpose that would violate client, organization, or vendor confidentiality or put participants at harm or risk. Those found in violation of this rule will have their access to CDB immediately terminated and the violation disclosed to all local government and funding entities.

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

At no time shall confidentiality of clients, organizations, or vendors be violated by selling any information. CDB Member Agency providers shall not profit from disclosure of client, organization, or vendor information. Disclosure of information puts everyone at legal risk. Violation or breaches in Health Insurance Portability and Accountability Act (HIPAA) and 42 CFR regulations can result in fines and jail time. Those found in violation of this rule will have their access to CDB immediately terminated and the violation disclosed to all local government and funding entities.

Violation and Corrective Action Plan Policy 3.9:

If an CDB Member Agency or any of its End Users have violated any CDB policy, the HMIS Staff will implement an action plan upon discovery of the violation.

Critical Risk

For example: Security Breach, Imminent risk to clients, Unresolved Data Quality Errors, Timeliness Issues, Incorrect Unit/Bed List Inventory, and Password Sharing.CDB Agency Administrator/POC immediately reports the violation to the HMIS Lead Agency.

- HMIS Lead Agency will suspend all CDB Member Agency Active End User Licenses. Affected End Users will be suspended until retraining or at the discretion of the HMIS Director.
- CDB Member Agency will be suspended until violation is resolved and will be placed on probation for at least 90 days.
- HMIS Lead Agency will contact the CDB Member Agency executive leadership to discuss violation and corrective action plans.
- Egregious violators will be permanently banned from the CDB. Names of violators will be tracked by the HMIS lead agency, and attempts to regain access to the CDB from any CDB Member Agency will be denied.

Medium Risk

For example: Grievance has been filed against CDB Member Agency or general complaints that threaten or endanger clients.

- CDB Agency Administrator/POC immediately contacts and reports to the HMIS Lead Agency to discuss the course of action and plan.
- HMIS Lead Agency will contact the CDB Member Agency in question to discuss the violation and course of action.
- CDB Member Agency will be placed on Probation for at least 90 days and possible suspension until violation resolved. If appropriate, CDB System Administrator will suspend or permanently remove all CDB Member Agency's Active End User Licenses.

Low Risk

For example: Unresponsive CDB Member Agency to HMIS Lead Agency Requests, Ceased Data Entry, and End User Inactivity.

- CDB Agency Administrator/POC immediately contacts and reports to the HMIS Lead Agency to discuss the course of action and plan.
- HMIS Lead Agency will contact the CDB Member Agency in question to discuss the violation and course of action.

Procedure 3.9:

If violations in HMIS-CDB policy occur, CDB Member Agencies will work to ensure violations in policy do not occur in the future. If a violation is discovered, it is the role of the HMIS Lead Agency to swiftly respond in order to prevent

further violations from occurring or the current violation from harming clients or other CDB Member Agencies. The HMIS Lead Agency staff will determine a course of action depending on the type and the severity of the policy violation. If appropriate, the HMIS Lead Agency will contact the CDB Member Agency Administrator/POC or executive leadership to discuss violation and corrective action plan. If appropriate, CDB Member Agency will be placed on probation for at least 90 days or until violation resolved. If appropriate, CDB System Administrator will suspend or terminate all or some of the CDB Member Agency End User Licenses in question.

Potential Courses of Corrective Action

Probation

The HMIS Lead Agency will notify the Agency's Executive Director and CDB Agency Administrator/POC in writing to set up a one-on-one meeting to discuss the violation in question. During the meeting, an action plan will be developed and documented with relevant time frames outlined to correct actions. If a training issue is identified, the HMIS-CDB Project Coordinator will coordinate further follow up with the End Users in question. The CDB Member Agency will be placed on probation, for a minimum of 90 days, where monitoring and auditing may be required and performed regularly during this period. Notification of probation will be communicated to all CDB Member Agency Executive Leadership.

Suspension

If a violation is of critical risk, the corrective measure(s) are not achieved in the probationary period, or more HMIS-CDB violations occur during the probationary period, the CDB System Administrator will suspend access to CDB until the issues are resolved. The CDB Member Agency will receive a written notice to the Member Agency's Executive Director of the suspension, reasons, and effective date. During suspension, a mandatory meeting will be held between the Member Agency Executive Director, the CoC Leadership, and the HMIS-CDB Staff, if appropriate, to discuss suspension and requirements for resolution. All meeting deliverables will be documented in writing and must be achieved within the set probationary period.

Termination

If the Member Agency violates any policies deemed of critical risk and fails to achieve resolution within the probation period, the HMIS-CDB Staff will permanently terminate the Member Agency from CDB. The CDB Member Agency will receive a written notice to the Member Agency Executive Director outlining the termination, reasons, and effective date. In the case of incurred data quality costs and/or transfer costs, the Member Agency will assume responsibility for payment.

Section 4: User Administration

CDB End User Prerequisites Policy 4.1

All CDB Users are required to have a minimum set of basic computer competency and skills to adequately perform their data entry roles in CDB.

Procedure 4.1:

Each CDB Member Agency Administrator should have an adequate base knowledge of technology use. All other CDB Users should be prepared with basic computer competency/skills to adequately be able to use and navigate

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

CDB. Users who do not have a minimum competency will be asked to leave training and seek a basic competency class. Basic computer competency classes can be found at a local library, community center, college, or business learning center. Once the user has completed the basic competency class, they can register and attend CDB training.

Background Check Policy 4.2:

The HMIS lead agency will undergo background checks to fulfill security and privacy policies to host the dedicated CDB Database. All CDB Users should have had a background check prior to being assigned access to the CDB by a CDB Member Agency. No prospective CDB User will be given a license for CDB if she or he has entered a plea of nolo contendere (no contest) or been found guilty of any fraud (including identity theft) or stalking related felony crimes punishable by imprisonment.

Procedure 4.2:

CDB Member Agency providers are to have completed background checks on all staff and volunteers prior to assigning them access to the CDB. CDB Member Agency providers shall review the received criminal history report before the end user signs-up for CDB-HMIS training. Background checks that come back with a criminal history should be carefully considered prior to giving them access to client information. A CDB Member Agency should not risk the privacy and confidentiality of client information by allowing any individual convicted of a fraud or stalking related crime (fraud, identity theft, stalking) in any state. In the broadest sense, a fraud is an intentional deception made for personal gain or to damage another individual. A CDB User needs to be mindful of potential identity theft and improper usage and disclosure of client information. This policy will be taken under consideration and possibly waived if the prospective user has passed a State of Tennessee Level II Background Check.

A CDB User will be denied CDB access if they meet any of the following, whether a judgment of guilt was withheld or not: has entered a plea of nolo contendere (no contest) to a fraud related felony crime (fraud, identity theft, stalking) punishable by imprisonment, has entered a plea of guilty to a fraud related felony crime (fraud, identity theft, stalking) punishable by imprisonment for crimes concerning, or has been convicted or found guilty of a fraud related felony crime (fraud, identity theft, stalking) punishable by imprisonment.

Previous Consumers of Services Policy 4.3:

Any prospective CDB User who was a previous client of the same project he or she now intends to work, or volunteer must not have resided at the facility nor received any services in the last two years prior to gaining access to CDB.

Procedure 4.3:

Guidance from The Department of Housing and Urban Development (HUD) and the Continuum of Care Memphis/Shelby County by people with lived expertise of homelessness and addressing homelessness by collaborating with, hiring, and sharing power with people impacted by this issue in the process, may have HMIS access.

The CDB User for any residential/homeless service projects may be a previous client of the same project for which they now intend to work or volunteer and should never have to access their detailed information on a project/service that may have been or will be received services at the same time as the end user. An HMIS User should never have access to detailed information on project/service participants that may have received services at the same time as the end user. Any CDB Member Agency that violates this rule is a confidentiality breach. Upon discovering the practice, HMIS Lead staff will immediately delete the CDB User account in question and notify the agency administrator and end user of the deletion in writing.

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

User Training Policy 4.4:

All CDB Users must be provided with a software license by and provided training through the HMIS staff prior to entering or accessing client data in HMIS. All CDB Users are required to have a basic computer competency prior to attending any CDB training. HMIS staff is available to deliver onsite training in the event that an agency has a large number of staff to train or wants a specific topic covered. HMIS Lead Agency has established an online training site through the HMIS-CDB database provider, Bitfocus/Clarity Human Services.

All users must have internet access and a company email address (personal if the agency agrees). Email must be able to be accessed over the internet.

Procedure 4.4:

Due to the amount of personally identifying information and the confidential nature of the CDB, every CDB User must be assigned a software license to access the system and their initial training must come from the HMIS Lead staff. In order to receive a license, a potential CDB User must not violate CDB policies 4.1 through 4.4. Furthermore, a condition of being granted a license is that all users must sign and adhere to an HMIS User Agreement. This document outlines the role and responsibility of having and maintaining their access in CDB. A CDB User who violates the CDB User Agreement will be immediately inactivated from the CDB and required to attend re-training to re-gain access.

If the user is having issues getting the system up and running, they can submit a ticket to the Help Desk by emailing helpdesk@cafth.org. A member of the HMIS staff will respond within one business day.

Revocation of Access Policy 4.5:

Notification of issuance and revocation of access within the CDB is the responsibility of Agency Administrator.

Procedure 4.5:

Agency Administrators are responsible for notifying the HMIS Lead staff of a new user, change in user access, or deletion of user access within 24 business hours of their organization's needed change to CDB access. Agency Administrators should work with the HMIS Lead staff to ensure proper license access is given to qualified CDB Users. However, issuance, maintenance, and revocation of software license within the CDB is the sole responsibility of HMIS Lead staff.

Assignment of End User Security Settings

The HMIS Lead staff will assign the security level of every end user based on the agreed upon security settings established by the Member Agency at the Initial CDB site visit or upon the request to create the new user account. The Agency Administrator or Executive Director will assign access to individuals based on their role in the organization and needed access to CDB. Assignments are best organized by the lowest level of security the staff or volunteer member would need to perform their normal work duties as defined by their official job/position description. If the CDB User is to remain on the system, but has had a change in responsibilities, an Agency Administrator or Executive Director may request a change in any end user's security setting.

Licenses Charges

All requests for new licenses must be submitted to the HMIS Lead Agency. Request forms must be received and approved no later than 72 hours before the scheduled training date. All new licenses are issued only after a MOA have been signed by the CDB Member Agency and the CDB End User Agreement has been signed by the appropriate CDB User. Each member agency will pay an established fee per user license utilized by the member agency as outlined in the MOA.

HMIS Lead Staff Removing A User License for Cause

HMIS Lead reserves the right to inactivate or delete the license for any end user for cause. In all cases where a licensee is removed for cause, the assigned CDB Member Agency Administrator/POC and Executive Director will be notified immediately via email with the stated cause of license removal. Reasons that a licensee would lose their license or otherwise have their license temporarily inactivated or revoked would include, but not be limited to:

- A consistent lack of good data quality;
- Sharing system credentials (log in and password) with any other party;
- Allowing non-authorized users to view any data from, have access to, see the screens of, or be provided any print outs of client data from HMIS; or
- Other serious infractions that result in a compromise of the CDB Member Agency and/or any client level data in the system.

Removing User Licenses

An CDB User license can only be deactivated by the HMIS Lead staff. Requests for removal or other change of a license by a CDB Member Agency can only come from the Agency Administrator or Executive Director. The request must be submitted through helpdesk@cafth.org. All license requests should be communicated to the HMIS Lead within 24 business hours after the end user has left the employment of the CDB Member Agency, the CDB User has changed positions and is no longer in need of CDB access, or has knowingly breached or is suspected of a system breach where client data has been compromised.

Law Enforcement Policy 4.6:

No active member of law enforcement,detention,and corrections staff will be an authorized CDB User.

Procedure 4.6:

To protect current clients who may be accessing health and human service projects from harassment or harm, active members of law enforcement will not be granted access to the CDB. Limited exceptions may be negotiated and an agreement executed with the HMIS Lead and the local COC, when there is a project with direct involvement in an active homeless jail diversion and/or prison release project. Any agreement with exceptions must include a statement that CDB use is:

1. Limited to the purpose for which it was intended; and
2. Is only for work with project involved clients.

Former members of law enforcement who may volunteer or are employed at a homeless service provider, post- law enforcement career, may have access to the CDB if it is imperative to their new responsibilities. The HMIS Lead will consider and respond to requests by law enforcement with next of kin searches, searches for clients and, in the interest of public safety, a person(s) who law enforcement has probable cause or an active warrant for his/her arrest related to a violent crime or other felony crimes. The CDB will provide law enforcement information related to

evidence and information gathering concerning a criminal matter via Court Order, such as a search warrant or subpoena.

Section 5: Client Rights and Client Consent

Client Consent Policy 5.1:

A CDB Member Agency must obtain consent from all clients for whom they are entering or accessing client data into the CDB.

Procedure 5.1:

No client shall be entered into the CDB without their written consent. The CDB Member Agency agrees to get written permission on one or both of the following forms signed by the client:

1. Informed Consent; and/or
2. Release of Information.

Informed Consent

The CDB Client Informed Consent form provided is required to be used to record a client's authorization for their data to be entered into the CDB. The original signed Client Informed Consent form should be kept by the CDB Member Agency and protected from theft or loss. This form explains to clients their rights and authorizes the data to be entered into the CDB. CDB End Users should strive to communicate the contents on the form in a language the client understands.

CDB Release of Information (ROI)

The CDB Release of Information (ROI) form is used to control how client data is shared in the CDB. It should be kept by the CDB Member Agency and protected from loss of theft. Member Agencies are required to use the CDB Release of Information form provided and upload it to the client's profile in the CDB. Release of information is specific to sharing data among providers in the Continuum of Care, as well as CDB Member Agencies. Clients have the right to have their records open, partially open or closed. CDB Users should strive to communicate a Release of Information in a language the client understands. The form must be completed by each member of the household receiving services who is over the age of 18. The head of the household may sign for any children or members of the household under the age of 18 on the same form. Clients who want to make changes to how their data is shared will need to sign another CDB Release of Information form and the data will need to be updated in the CDB.

Uploading Client Documentation

Along with the ROI, other documents are also required to be scanned and uploaded in the CDB, which are:

- CDB Consent/ROI Form
- Proof of Homelessness
- Proof of Chronic Homelessness Status
- SSN Card
- Proof of Disability
- Proof of Insurance
- Proof of Income
- Proof of Non-cash Benefits (Food Stamps, Medicaid Card)

- Lease for Clients Who Get Housed Upon Exit from the Project (PH Only)
- Destination Documentation

Reasonable Accommodations

Agencies must make reasonable accommodations for persons with disabilities throughout the data collection process. This may include, but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. Agencies that are recipients of federal assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the project.

Client Access to Information Policy 5. 2:
All clients entered into the CDB have a right to view information within their electronic CDB file.

Procedure 5.2:

If a CDB Member Agency has a written policy for providing copies of their paperwork or data collection to clients, the CDB Member Agency may follow its procedures to allow for providing copies of the CDB data they collected. Clients can request a copy of their information in writing to the HMIS Lead staff through email or regular mail. Once received, the HMIS staff will fulfill the client's request in an expedited manner.

Client Grievance Policy 5. 3:

Clients have the right to file a grievance with the HMIS Lead staff about any CDB Member Agency related to violations of access in the CDB, violations of CDB Policies and Procedures, or violations of any law.

Procedure 5.3:

HMIS Lead Agency staff will entertain any client who wishes to file grievance against any CDB Member Agency. HMIS staff will request that a client fill out a HMIS-CDB Client Grievance Form, which can be obtained by contacting the HMIS staff by phone, email or regular mail. Once completed and submitted by the client, HMIS Staff will investigate the complaint and provide its findings to the client who filed the grievance. HMIS will notify the parties involved about the alleged incident reported. If the client is not satisfied with the findings of the grievance, the client may submit a grievance request in writing to the U.S. Department of Housing and Urban Development.

CDB Member Agency Grievance Policy 5. 4:

Other CDB Member Agencies have a right to file a grievance with the HMIS staff about any CDB Member Agency related to violations of access in the CDB, violations of CDB Policies and Procedures, or violations of any law.

Procedure 5.4:

HMIS Lead staff will entertain any CDB Member Agency who wishes to file grievance against any other CDB Member Agency. In cases where a client leaves one CDB Member Agency to receive services from another CDB Member

Agency and the client reports a suspected violation, the new CDB Member Agency does have a right to file a grievance or duty to warn the HMIS Lead staff on behalf of the client as long as the client grants their permission to file a grievance on their behalf. HMIS Lead staff will request a HMIS-CDB Client Grievance Form be completed by either the client or the CDB Member Agency. The form can be obtained by contacting the HMIS staff by phone, email or regular mail. Once completed and submitted, HMIS Staff will investigate the complaint and provide its findings to the client who lodged the grievance. HMIS staff will notify the parties involved and the appropriate community planners about the alleged incident reported. If the client is not satisfied with the findings of the grievance, the client may submit a grievance request in writing to the U. S. Department of Housing and Urban Development.

Revoking Authorization for CDB Data Collection Policy 5.5:

All clients who initially agree to participate in the CDB have the right to rescind their permission for data sharing in CDB.

Procedure 5.5:

Clients who choose to revoke their information sharing authorization must complete a new Release of Information. The new Release of Information should be sent by the Agency Administrator who will notify the HMIS Lead Agency that the client record is to be "closed" in the system. The CDB Lead Agency will be responsible for closing the client record from view. Once closed, the CDB Member Agency will no longer be able to share future client data entered into the CDB. However, data entered prior to the record being closed can still be viewed and shared with other Member Agency providers. The new Release of Information should be kept on file by the Member Agency. After a Release of Information is signed and a client is accepted into a HMIS-CDB participating financial assistance project, the client must sign a client consent form and HMIS Lead Agency staff must be notified to re-open the client record for sharing. The notification to re-open the file must be submitted in writing, along with a scanned copy of the client's newly signed consent.

Section 6: Privacy, Safety, and Security

Privacy Requirements Policy 6.1:

CDB complies with all federal, state, local laws, standards, and regulations. CDB Member Agencies must also follow any applicable federal, state, and local laws, standards, and regulations.

Procedure 6.1:

CDB Member Agencies must have policies and procedures in place that ensure compliance with applicable laws and regulations that govern their projects. Such policies and procedures may be reviewed by the HMIS Lead Agency during monitoring or as requested.

HIPAA and/or 42 CFR Part 2 Covered Entities

Any Agency that is considered a "covered entity" under the Health Insurance Portability and Accountability act of 1996, 45 C.F.R., Parts 160 & 164, and corresponding regulations established by the U.S. Department of Health and Human services is required to operate in accordance with HIPAA regulations. More information about 45 C.F.R. may be found at: http://www.hhs.gov/ocr/privacy/42 CFR Part 2 Entities. Any Agency that is considered a "covered

entity" under 42 C.F.R. Part 2 is required to operate in accordance with the corresponding regulations established by the U.S. Department of Health and Human Services. More information about 42 C.F.R. may be found at: https://www.ecfr.gov/current/title-42/part-2

Other Entities

Any Agency that is NOT considered a "covered entity" under any of the above-mentioned projects is required to operate in accordance with HMIS/HMIS privacy and security rules, as well as any applicable federal, state, local laws and regulations. More information about HMIS Privacy and Security Rules may be found at: https://www.govinfo.gov/content/pkg/FR-2011-12-09/pdf/2011-31634.pdf

Privacy Notice Policy 6.2:

CDB Member Agency providers must post a HMIS-CDB Privacy Notice prominently on their websites and in areas of plain view of the public such as waiting rooms, intake areas, lobbies, or screening/assessment areas. CDB Member Agency providers are required to provide a copy of the HMIS Privacy Notice to all clients upon request by the client.

Procedure 6.2:

By law, CDB Member Agency providers are required to post a Privacy Notice that discloses collection and use of Client Information. The HMIS Lead Agency has developed a document for posting for providers without an adequate notice. The HMIS Privacy Policy and Notice are posted on CAFTH HMIS Resources website: https://www.cafth.org/hmis- resources

System Security and Privacy Statement Policy 6.3

The HMIS Lead Agency has implemented extensive technical and procedural measures to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data as recommended in the HMIS Data and Technical Standards.

Procedure 6.3:

The security and confidentiality of homeless and at-risk client information within HMIS is a major issue. For certain providers and sub-populations, such as Domestic Violence Shelters, Substance Abuse Facilities and Health Insurance Portability and Accountability Act (HIPAA) Covered Entities, security and confidentiality of client information becomes even a much larger concern for all involved. The HMIS Data and Technical Standards, published June 30, 2004 and updated through 2020 by the U.S. Department of Housing and Urban Development (HUD), include extensive HMIS Privacy and Security Standards to be followed by Continuum of Services, Homeless Assistance Providers, and HMIS Software companies. These standards were developed after careful review of the

HIPAA standards for securing and protecting patient information. The HMIS-CDB system has and will continue to be in compliance with these Privacy and Security Standards even while not being considered a HIPAA covered entity as a CDBLead Agency. CDB Member Agencies requiring Business Associates Agreements from the HMIS Lead Agency may request those as needed.

Security Policy 6.4:

The HMIS Lead Agency secures the location of the server in a controlled hosting environment providing security from data loss and theft. The HMIS Lead Agency holds a copy of the HMIS-CDB Vendor's Privacy, Security, and Disaster Recovery Plans.

Procedure 6.4:

The HMIS Lead Agency contracts with a HUD approved software vendor to provide CDB to the Continuum of Care. As a web based HMIS-CDB solution, the software and databases are hosted on secure servers in a highly secure computer room accessible only by very few employees who are responsible for maintaining and supporting the system. The vendor computers are also protected by firewalls to prevent unauthorized external access.

Access Policy 6.5:

The HMIS Lead Agency ensures that only appropriate staff and volunteers at CDB Member Agency providers gain and retain system access through a user authentication process.

Procedure 6.5:

As an Internet based software system, each CDB User accesses the system via their internet web browser thru Two Factor Authentication (2FA) is an extra layer of security used to make sure that people trying to gain access to an online account are who they say they are. First, a user will enter their username and a password. Then, instead of immediately gaining access, they will be required to provide another piece of information to access the CDB, each user must know the web address (URL) for HMIS, which is not available or published outside the community on the website, each user must use a valid user sign on and dynamic password. All user names and initial temporary passwords are issued by HMIS Lead Agency staff only. After three failed login attempts, user IDs and passwords automatically become inactive and users must contact the CDB helpdesk for re-activation. Passwords are always encrypted and can never be seen in clear text.

Encryption Policy 6.6:

The CDB secures data as it is traveling over the Internet and stored on the centralized server by proving encryption for all data.

Procedure 6.6:

As a cloud or web-based software system, it is imperative that all data travel through the Internet encrypted or unreadable to an outside user. All CDB transactions are fully encrypted using Secure Socket Layer (SSL) with 128-bit encryption. This is the highest commercially available encryption level and is the same as used by financial institutions. Users can be assured that the data they are interacting with is secure by noticing the URL, or Web Address while using the CDB begins with the letters HTTPS (Hyper Text Transfer Protocol Secure).

User Access Level Policy 6.7:

HMIS Lead Agency staff, in conjunction with the CDB Member Agency Administrator, ensures that all CDB Users have access to the components of the system appropriate for their level of data usage.

Procedure 6.7:

The CDB software has a built-in security levels that ensures each user only has the minimum access needed to perform their normal duties. Each CDB User is assigned a security level in their user profile that grants them access to only the areas they need to accurately do their work. A change to the level of system security for an end user may only be requested by an Agency Administrator or Executive Director for which the end user works and an additional cost may apply based on the level of access needed.

Audit Logging Policy 6.8:

CDB staff use audit trail tools to ensure system maintenance, investigate privacy and security breaches, and investigate filed client grievances.

Procedure 6.8:

The CDB software has built-in audit trail applications that allow administrators to audit use and access of data. Audit reporting is an integral part of maintaining system security protocols and is performed on a scheduled basis, no less than quarterly, by CDB staff utilizing built in Audit Logging Reports from the CDB.

Visibility Policy 6.9:

The CDB is a shared information system with default visibility and security exceptions preset by CDB staff based on the workflow of the Member Agency.

Procedure 6.9:

Pursuant to 42 and 45 CFR notwithstanding, the CDB is not an open or shared HMIS system. The default visibility settings for clients will be set to CLOSED for all CDB clients that are not registered or receiving services from any 42 or 45 CFR facility or project. If a client is enrolled in a 42 or 45 CFR covered entity project, project visibility settings will be set in accordance to applicable laws.

The CDB system utilizes a set of Visibility Settings that allow sharing of only agreed upon data elements among the participating CDB Member Agencies. The CDB system utilizes a set of Deny Exceptions that disallow sharing of certain information by provider projects based upon federal, state, or local laws and guidelines, and by agreement with each CDB Member Agency provider. System Visibility settings may only be changed by the HMIS Lead Agency staff. Requests to change visibility settings must be made via written request to HMIS staff. The HMIS System is constructed to offer a dynamic range of levels of security based on the needs of the agency and HMIS User. As a default, CDB Users will only have enough security access to perform their normal job duties. Requests to change a user status must come from an CDB Member Agency Administrator or Executive Director. A client has the right to refuse to have his or her data entered into the CDB database. The client's individual choice regarding participation will not affect his or her right to services. No greater visibility in the CDB database may be activated without further written consent provided by each client

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

Data Ownership Policy 6.10:

All data is governed by the owner(s) of the data with regard to data use and disclosure.

Procedure 6.10:

The client ultimately retains ownership of any identifiable client-level information that is stored within the CDB. If the client consents to share data, the client, or agency on behalf of the client, has the right to later revoke permission to share her or his data without affecting rights to service provision. system maintenance, investigate privacy, security breaches or filed client grievances.

Section 7: CDB Technical Support

Requesting Technical Assistance Policy 7.1:

CDB End Users may request technical assistance regarding the database from HMIS-CDB staff. HMIS-CDB staff will respond to all inquiries from Member Agencies in a timely manner. Response times for technical assistance varies based on the item that is submitted and the priority associated. HMIS-CDB Staff reserve the right to adjust priority levels based on the type of the request. Requests for routine system technical support will be honored on a first-come, first- served basis.

Procedure 7.1:

CDB End Users may request technical assistance by sending an email to CDBhelpdesk@cafth.org.

Feature Enhancement Policy 7.2:

HMIS-CDB Staff will submit to the vendor all feature enhancement requests submitted through the proper channels from Agency Administrator(s) or the agency POC.

Procedure 7.2:

It is a stated goal of the HMIS Lead Agency to be as efficient and user-friendly as possible within the technical restraints of the system. Feature enhancement requests are welcomed and encouraged. Please submit all possible feature enhancements by sending an email to CDBhelpdesk@cafth.org.

If enhancement is for new system functionality, please describe a work flow and diagram as much as possible. If appropriate, please denote how much time savings would be achieved if the feature enhancement were to be enacted. If appropriate, please denote all of the possible benefits for your agency or End Users and other Member Agency providers if feature enhancement were to be enacted.

HMIS Resources and Information Policy 7.3:

HMIS Lead Agency staff have provided the HMIS website for its CDB Users. HMIS Lead staff may also hold mandatory periodic in person meetings or conference calls to discuss system changes and provide technical support.

Procedure 7.3:

Links to HMIS information, resources, and forms are located at the follow address: https://www.cafth.org/hmis-resources

Please feel free to visit the site for the latest regulation changes, HMIS-CDB news, HMIS-CDB Forms, links to Clarity Human Services/Bitfocus, the Help Desk, and for any other helpful information.

Section 8: Data Collection Process

Clients Served vs. Clients Benefiting from Service Policy 8.1:

All client data entered into the CDB by a CDB Member Agency should be that of clients and/or his/her family receiving services.

Procedure 8.1:

Clients entered into the CDB should consist of the clients in attendance at the day of enrollment into the project or services, and can consist of minors under the age of 18 if the legal guardian consents to their entry into the CDB. The CDB is not meant for adult clients who are not in attendance or may benefit from services at a later date. CDB Member Agency providers should refrain from entering adult clients into the CDB that are not physically seen to be enrolled in the project or provided the service because they cannot give consent in absentia. For those providing financial assistance services per address, it is expected each member of the household receiving the service by the same address must provide consent and be entered as a household unit in the CDB using the household management function in the CDB, otherwise there is a risk of duplication of services. Data on all members of the family should be entered individually, but tied together as a household. The head of household can give consent for all minor children (under 18 years of age) in a family but cannot give consent for any adult members (over the age of 18). All adults must give their consent individually.

Data Entry Requirements Policy 8.2:

The Homeless Management Information System staff requires each CDB Member Agency to enter client level data based on the most current HMIS Data Standards and Comparable Database Manual.

Procedure 8.2:

Required data collection is based on the most current revision of the HUD Homeless Management Information System (HMIS) Data Standards. Every project entering into HMIS must adhere to the requirements set by HUD and

the local Continuum of Care. Every project entering data into the CDB is evaluated based on the following elements: completeness; consistency; accuracy; and timeliness. Refer to Section on Data Quality for details.

Providers are required to enter the following Universal Data Elements as outlined in the Appendix of this document or in the most current HMIS Data Standards Manual minimum data entry standards. The elements required for every person who is entered in the system are: Release of Information (documented), Name (First, Last) (Data Quality), Social Security Number (partial) (Data Quality), Date of Birth (Data Quality), Race, Ethnicity, Gender, Veteran Status, Disabling Condition, Project Start Date, Project Exit Date, Destination, Relationship to Head of Household, Client Location, Enrollment CoC, Housing Move-in Date, and Prior Living Situation.

Procedures for McKinney-Vento Funded/HUD Federal Partner Projects

CDB Member Agencies who are funded through any of the programs below must meet the basic requirements set by the HMIS Lead Agency and also meet additional Program Specific Data Elements (PSDE):

- Emergency Solutions Grant (ESG);
- Supportive Services for Veteran Families (SSVF)
- VA Grant and Per Diem Program (GPD);
- Veterans Affairs Supportive Housing Program (VASH);
- Runaway and Homeless Youth Programs (RHY);
- Projects for Assistance in Transition from Homelessness (PATH);
- Youth Homelessness Demonstration Project (YHDP);
- CoC Program Projects (Permanent Supportive Housing, Rapid Rehousing, Transitional Housing, Joint Projects, and Services Only Projects); and
- Housing Opportunities for Persons with AIDS (HOPWA).

Additional program specific data elements to be collected are detailed in the 2024 HUD Data Standards and vary by program type (e. g. PATH, SSVF, RHY, ESG, YHDP etc.) and may include: Housing Status, Income amount, Income Source(s), Income Date(s), Non-Cash Benefits, Non-Cash Benefits Source(s), Non-Cash Benefits Date(s), and Sources, Health Insurance, Health Insurance Source(s), Health Insurance Information Date, Reason for No Health Insurance (if applicable), Disability Type, Domestic Violence Victim/Survivor, Domestic Violence Information Date, Contact Date (Street Outreach Only), Date of Engagement (Street Outreach and Services Only Projects), Services Provided (PATH, HOPWA, & VA Funded), Referrals Provided, Residential Move-in Date, Housing Assessment Disposition) and, Housing Assessment at Exit. The housing status must be recorded at Project Start. The client's income and sources must be recorded at Project Start and verified at least one time during a year if in the project over a year. It is recommended that Member Agencies and Agency Administrators review the most current 2024 Data Dictionary at FY 2024 HMIS Data Standards Data Dictionary - Version 1.1, and the most current 2024 Data Standards at: https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2024.pdf.

Bed Inventory Policy 8.3:

All Housing Providers are required to maintain the most current bed inventory in the CDB.

Procedure 8.3:

All Housing Providers must work with HMIS Lead Staff to build accurate bed lists in the CDB. Each CDB bed list should be assigned to the appropriate project (Emergency, Transitional, Permanent Supportive, etc.).

Optional Elements Policy 8.4:

All Member Agency providers are encouraged to record all Program-Specific Data Elements (PSDE) for all clients entered into the CDB even if not required for funding.

Procedure 8.4:

Optional PSDEs are a valuable area of the client record and part case management. Therefore, though not required, CDB Users are encouraged to complete these elements for each client, especially if the client is in a housing or financial assistance project. The optional PSDE include: Employment, Adult Education, General Health Status, Pregnancy Status, Veteran's Information, and Children's Education.

CDB Client Photo ID Cards Policy 8.5:

Member Agency providers are able to create and disseminate CDB Client Photo ID Cards for all clients being entered into the CDB. CDB Member Agency providers are invited to use the CDB Client Photo ID Cards for all clients who have left behind personally identifiable information with the Member Agency. Further use of Photo ID cards are left to the discretion of CDB Member Agencies privacy protection policies as long as they do not violate policies in this document.

Procedure 8.5:

Clarity Human Services HMIS-CDB has the capacity to produce HMIS-CDB Client Photo ID Cards. CDB Member agencies interested in taking advantage of this feature can reach out to the HMIS Lead Agency for discussing implementation of this function.

Section 9: Data Quality

Data Quality Policy 9.1:

Data quality is vitally important to the success of the CDB Homeless Management Information System. CDB Member Agency providers and HMIS Lead staff will work diligently on adhering to the most current revision of the HUD HMIS Data Standards in order to ensure that reports both at the provider level and the system level are complete, consistent, accurate, and timely. Adherence to set data quality standards will help bring additional funding into the community as well as ensure the data reflects our community's level of service when reported locally, statewide, or nationally.

Client Data Quality

All client data entered into the CDB should reflect what the client self- reported or an accurate assessment of known information by a case manager, where indicated by the most current revision of the HUD HMIS Data Standards. HUD procedures allow case managers to make changes to client data not reported by the client. Client self- reported means any information reported to staff by the client. All client data entered into the CDB should also be congruent with program details.

Program Data Quality

Client records entered into the CDB should reflect the client population served, match capacity of enrollment,

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

project type, and project intake/exit should fall within service parameters. This information is based on consistency of accurate data entered on clients receiving services. For example, if the project is specifically for men, there should not be data entered for women. Or if the program inventory is listed as having 20 beds, there should be no more than 20 people in shelter unless overflow beds are being utilized.

Procedure 9.1:

Data quality will be evaluated on accuracy, completeness, consistency, and timeliness. This data will be used by the Continuum of Care to monitor progress towards meeting its benchmarks. The HMIS Lead Agency will evaluate the quality of all CDB Member Agency data on the accuracy of the data entered according to the established Data Quality Plan.

Data Quality Reports Policy 9.2:

The CDB software includes a series of reports to aid in outcome evaluation, data quality monitoring, and analysis of system trends. The HMIS Lead Agency staff may also provide specialty reports to CDB Member Agency providers as requested for a fee.

Procedure 9.2:

Assistance from the HMIS Lead Agency staff to customize reports may be a fee-based service. A request must be submitted to the CDB Help desk via email to CDBhelpdesk@cafth.org for evaluation and fee determination.

Section 10: Performance Measurement

Performance Measurement Policy 10.1:

HMIS Lead Agency staff will measure the performance of CDB Member Agency providers as it relates to the quality of the data entered into the system. Additionally, performance on a system-level will be measured to show the progress towards our Continuum of Care in ending homelessness. Performance measurement will be in alignment with stated project goals, community best practices/standards, and thresholds utilized for Continuum of Care project rating and ranking.

HMIS Lead Agency staff will measure the timeliness and completeness of data entered by each CDB Member Agency as well as bed utilization rates and current inventory accuracy.

Procedure 10.1:

The HMIS Lead Agency will evaluate the quality of all CDB Member Agency data on the accuracy of the data entered according to the established Data Quality Plan.

Appendix

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

Acronyms and Definitions

Term	Acronym	Description/Definition
Administration for Children and Families	ACF	A division of the U.S. Department of Health and Human Services (HHS). ACF has a budget for programs that target children, youth and families, including for assistance with welfare, child support enforcement, adoption assistance, foster care, child care, and child abuse.
Agency Administrator	AA	A person designated by a HMIS Member Agency Executive Director/Chief Executive Officer who acts as a liaison and contact person to the HMIS staff.
Alliance of Information & Referral Systems	AIRS	The professional association for more than 1,000 community information and referral (I&R) providers serving primarily the United States and Canada. AIRS maintain taxonomy of human services.
Annual Assessment		Data collection must include an annual assessment for all persons in the project one year or more. Data elements required for collection at annual assessment must be entered with an Information Date of no more than 30 days before or after the one-year anniversary of the head of household's Project Start Date, regardless of the date of the most recent 'update' or any other 'annual assessment.'
Annual Performance Report	APR	Report that tracks program progress and accomplishments in HUD`s competitive homeless assistance programs. The APR provides the grantee and HUD with information necessary to assess each grantee`s performance.
Audit Trail		A record showing who has accessed a computer system and what operations he or she has performed during a given period of time. Most database management systems include an audit trail component.
Bed Utilization		An indicator of whether or not project beds are occupied on a particular night or over a period of time.
Biometrics		Refers to the identification of a person by computerized images of a physical feature, usually a person's fingerprint.
Chronic Homelessness	CH	HUD defines a ''chronically homeless'' individual as a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the ''chronically homeless'' definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last three years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least seven nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.
Client		A living individual about whom a Covered Homeless Organization (CHO) collects or maintains protected personal information because (1) the individual is receiving, has received, may receive, or has inquired about assistance from a CHO; or (2) in order to identify needs, or to plan or develop appropriate assistance within the Continuum of Care (CoC).
Client Intake		The process of collecting client information upon entrance into a program.
Community Development Block Grant	CDBG	A flexible program that provides communities with resources to address a wide range of unique community development needs. Beginning in 1974, the CDBG program is one of the longest continuously run programs at HUD. The CDBG program provides annual grants on a formula basis to general units of local and State governments.
Comparable Database	CDB	A comparable database is a separate instance of an HMIS for Victim Service Providers who service clients that are victims of domestic violence. According to VAWA (Violence against Women Act), all HUD-funded domestic violence housing programs are required to enter their data into a comparable database.
Consumer		An individual or family who has or is currently is experiencing homelessness.

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

Continuum of Care	CoC	Also called CoC or Continuum, means the group organized to carry out the responsibilities required under the CoC Program Interim Rule(24 CFR Part 578) and is comprised of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, and law enforcement, and organizations that serve homeless and formerly homeless persons to the extent that these groups are represented within the geographic area and are available to participate.
Continuum of Care Program	CoC Program	Each year, HUD awards CoC Program funds competitively to nonprofit organizations, States, units of local governments, and/or instrumentalities of State or local government, collectively known as recipients. In turn, recipients may contract or subgrant with other organizations or government entities, known as subrecipients, to carry out a grant's day-to-day project operations. For the purposes of data collection in HMIS, a program refers to the federal funding source (e.g., HUD CoC, HHS PATH, VA SSVF, YHDP, etc.) whereas project refers to a distinct unit of an organization as set up in the HMIS.
Continuum of Care Project	CoC Project	CoC project refers to a distinct unit of an organization, which may or may not be funded by HUD or the Federal Partners, whose primary purpose is to provide services and/or lodging for the homeless and is identified by the Continuum as part of its service system. For example, a project funded by the HUD's CoC Program may be referred to then as a "CoC Program-funded continuum project."
Coordinated Entry	CE	HUD requires each CoC to establish and operate a "centralized or coordinated assessment system" (referred to as "coordinated entry" or "coordinated entry process") with the goal of increasing the efficiency of local crisis response systems and improving fairness and ease of access to resources, including mainstream resources. Both the CoC and ESG Program interim rules require use of the CoC's coordinated entry process, provided that it meets HUD requirements. Coordinated entry processes are intended to help communities prioritize people who are most in need of assistance. They also provide information to CoCs and other stakeholders about service needs and gaps to help communities strategically allocate their current resources and identify the need for additional resources.
Covered Homeless Organization	CHO	Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses, or processes data on homeless clients. The requirements of the HMIS Final Notice apply to all Covered Homeless Organizations.
Data Quality		The accuracy and completeness of all information collected and reported to the HMIS.
Date of Birth	DOB	The date a person was born.
De-identification		The process of removing or altering data in a client record that could be used to identify the person. This technique allows research, training, or other non-clinical applications to use real data without violating client privacy.
Department of Education	DOE	The agency of the federal government that establishes policy for administrators and coordinates most federal assistance to education. It assists the president in executing education policies for the nation and in implementing laws enacted by Congress.
Digital Certificates		An attachment to an electronic message used for security purposes. The most common use of a digital certificate is to verify that the user sending a message is who he or she claims to be and to provide the receiver with the means to encode a reply.
Disabling Condition		A disabling condition in reference to chronic homelessness is defined by HUD as a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions. A disabling condition limits an individual`s ability to work or perform one or more activities of daily living.
Domestic Violence	DV	Occurs when a family member, partner or ex-partner attempt to physically or psychologically dominate another. This includes physical violence, sexual abuse, emotional abuse, intimidation, economic deprivation, and threats of violence. Violence can be criminal and includes physical assault (hitting, pushing, shoving, etc.), sexual abuse (unwanted or forced sexual activity), and stalking. Although emotional,

		psychological and financial abuses are not criminal behaviors, they are forms of abuse and can lead to criminal violence. There are a number of dimensions of DV.
Electronic Housing Inventory Chart	eHIC	Point-in-time inventory of provider programs within a Continuum of Care that provide beds and units dedicated to serve persons who are homeless, categorized by five Program Types: Emergency Shelter; Transitional Housing; Rapid Re-housing; Safe Haven; and Permanent Supportive Housing.
Electronic Special Needs Assistance Program	e-snaps	The electronic grants management system used by HUD's Office of Special Needs Assistance Programs (SNAPS) is known as *e-snaps*. This system supports the CoC Program funding applications and grant awards process for the HUD CoC Program.
Emergency Food and Shelter Program	EFSP	A Federal program administered by the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) and has been entrusted through the McKinney-Vento Homeless Assistance Act to supplement and expand ongoing efforts to provide shelter, food and supportive services for hungry and homeless people across the nation.
Emergency Shelter	ES	Any facility whose primary purpose is to provide temporary shelter for the homeless in general or for specific populations of the homeless.
Emergency Solutions Grants	ESG	The ESG Interim Rule took effect on January 4, 2012. The change in the program's name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.
Emergency Solutions Grant Consolidated Annual Performance and Evaluation Report	ESG CAPER	Recipients with HUD funding received through the Emergency Solutions Grants (ESG) Program are required to submit a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD annually. Data collection for the ESG portion of the CAPER is aligned with the most recent version of the Homeless Management Information System (HMIS) Data Standards.
Emergency Solutions Grants-CARRES Act (ESG-CV)	ESG-CV	The CARES Act appropriated $4 billion through the Emergency Solutions Grants (ESG) Program "to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus under the Emergency Solutions Grants program (42 U.S.C. 11371)."
End User	EU	Any individual who uses or enters data in an HMIS or a comparable database approved by the CoC. This can include Agency Administrators.
Encryption		Conversion of plain text into unreadable data by scrambling it using a code that masks the meaning of the data to any unauthorized viewer. Computers encrypt data by using algorithms or formulas. Encrypted data are not readable unless they are converted back into plain text via decryption.
Ethnicity		Identity with or membership in a particular national, or cultural group and observance of that group's customs, beliefs, and language. Within the HMIS, ethnicity can be classified as either Non-Hispanic/Non-Latino or Hispanic/Latino (a person of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture of origin regardless of race).
Family and Youth Services Bureau	FYSB	Provides national leadership on youth and family issues. Promotes positive outcomes for children, youth, and families by supporting a wide range of comprehensive services and collaborations at the local, Tribal, State, and national levels.
Family Violence Prevention & Services Act	FVPSA	1984 Federal Legislation creating The Office of Family Violence Prevention and Services, which oversees federal funding for Domestic Violence Emergency Shelters as well as other supportive services underneath the Department of Housing and Human Services.
Federal Emergency Management Agency	FEMA	The federal agency responsible for coordinated response for disaster that has occurred in the United States and that overwhelms the resources of local and state authorities.
Federal Information Processing Standards	FIPS	Standards developed by the National Institute of Standards and Technology (NIST) to ensure that all federal government and agencies adhere to the same guidelines regarding security and communication.

Geographic Information Systems	GIS	An information system for capturing, storing, analyzing, managing, sharing, and displaying geographically referenced information.

Government Performance and Results Act	GPRA	One of a series of laws designed to improve government project management. The GPRA requires agencies to engage in project management tasks such as setting goals, measuring results, and reporting their progress. In order to comply with GPRA, agencies produce strategic plans, performance plans, and conduct gap analysis of projects.
Hashing		The process of producing hashed values for accessing data or for security. A hashed value is a number or series of numbers generated from input data. The hash is generated by a formula in such a way that it is extremely unlikely that some other text will produce the same hash value or that data can be converted back to the original text. Hashing is often used to check whether two texts are identical. For the purposes of Homeless Management Information Systems, it can be used to compare whether client records contain the same information without identifying the clients.
Health Insurance Portability and Accountability Act of 1996	HIPAA	U.S. law designed to provide privacy standards to protect patients' medical records and other health information provided to health plans, doctors, hospitals, and other health care providers. Developed by the Department of Health and Human Services, these standards provide patients access to their medical records and give them more control over how their personal health information is used and disclosed.
HMIS Data and Technical Standards Final Notice		Regulations issued by HUD via the Federal Register describing the requirements for implementing HMIS. The HMIS Final Notice contains rules about who needs to participate in HMIS, what data to collect, and how to protect client information.
HMIS Lead Organization	HMIS Lead	The central organization that has been designated by the CoC that will employ those individuals who will be directly involved in implementing and providing operational, training, technical assistance, and technical support to Homeless Management Information System (HMIS) participating agencies.
HMIS Member Agency		An agency who has signed all HMIS agreements and who is actively entering data into the system.
HMIS System Administrator	Admin	The individual(s) whose job it is to manage the HMIS implementation at the local level: enrolling programs and managing appropriate use, supporting users through connection to or direct provision of user training, and overseeing system setup.
Homeless Management Information System	HMIS	Computerized data collection tool designed to capture client-level information over time on the characteristics and service needs of men, women, and children experiencing homelessness.
Homeless Management Information System Comparable Database	HMIS Comparable Database	A comparable database is a relational database that meets all HMIS Data Standards and the minimum standards of HMIS privacy and security requirements, including HUD's most recent reporting standards and comma separated value (CSV) format specifications. Based on VAWA requirements, HUD CoC and ESG recipients who are victim service providers are prohibited from entering personally identifying information into HMIS. The data may only be entered into an approved HMIS Comparable Database For assistance in determining if a program is prohibited from entering data into HMIS, see the HMIS Comparable Database Decision Tree Tool.
Homeless Emergency Assistance and Rapid Transition to Housing: CoC Program Interim Rule	HEARTH CoC Interim Rule	This interim rule, published in the Federal Register on July 31, 2012, establishes the regulations for the CoC Program and focuses on regulatory implementation of the CoC Program, including the Continuum of Care planning process. The existing homeless assistance programs that comprise the Continuum of Care Program are the following: The Supportive Housing Program, the Shelter Plus Care Program, and the SRO Program. The final Homeless Definition is in effect for administration of the CoC Program interim rule.
Homelessness Prevention and Rapid Re-Housing Program	HPRP	The Homelessness Prevention and Rapid Re-Housing Program was authorized in 2009 under the American Recovery and Reinvestment Act to provide financial assistance and services to prevent individuals and families from becoming homeless and help those who are experiencing homelessness to be quickly re-housed and stabilized. The program ended in September 2012.

Housing Opportunities for Persons with AIDS	HOPWA	Established by HUD to address the specific needs of persons living with HIV/AIDS and their families. HOPWA makes grants to local communities, States, and nonprofit organizations for projects that benefit low-income persons medically diagnosed with HIV/AIDS and their families.

Host Home		A host home is a short-term housing option that provides a safe living environment and client-driven supportive services to youth 18-24 who have experienced homelessness.
HOPWA Consolidated Annual Performance and Evaluation Report	HOPWA CAPER	The CAPER report for HOPWA formula grantees provides annual information on program accomplishments that supports program evaluation and the ability to measure program beneficiary outcomes as related to: maintain housing stability; prevent homelessness; and improve access to care and support.
Inferred Consent		Once clients receive an oral explanation of HMIS, consent is assumed for data entry into HMIS. The client must be a person of age and in possession of all his/her faculties (for example, not currently experiencing a mental health crisis).
Information and Referral	I&R	A process for obtaining information about programs and services available and linking individuals to these services. These services can include emergency food pantries, rental assistance, public health clinics, childcare resources, support groups, legal aid, and a variety of nonprofit and governmental agencies.
Issues and Conditions and Grant Technical Submissions (C1.9a)		The second phase of the CoC Program Competition process where an applicant that is successful in the competition may need to provide more detailed technical information or updates about the project as requested by HUD.
Mandatory Data Collection/Privacy Notice		For a privacy notice, an agency must post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting HMIS information, and the uses and disclosures allowable.
McKinney-Vento Homeless Assistance Act	McKinney-Vento	The McKinney-Vento Homeless Assistance Act was signed into law by President Ronald Reagan on July 22, 1987. The McKinney Vento Act funds numerous programs providing a range of services to homeless people, including the Continuum of Care programs: The Supportive Housing Program, the Shelter Plus Care Program, and the Single Room Occupancy Program, as well as the Emergency Shelter Grant Program.
McKinney-Vento Homeless Assistance Act As Amended by S.896 HEARTH Act	HEARTH	The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program known as the Continuum of Care (CoC) Program. These three programs include the Supportive Housing Program, the Shelter Plus Care Program, and the Moderate Rehabilitation/Single Room Occupancy (SRO) Program. The HEARTH Act also codifies into law the Continuum of Care planning process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs. It also revises the Emergency Shelter Grants program and renames it the Emergency Solutions Grants (ESG) program. The HEARTH Act required HUD to establish standards related to HMIS, including standards related to encryption of the data collected and the rights of persons receiving services under the McKinney-Vento Act. This proposed rule provides for: 1) uniform technical requirements of HMIS; 2) proper collection of data and maintenance of the database; and 3) confidentiality of the information in the database.
Memorandum of Agreement	MOA	A bilateral or multilateral agreement between two or more parties.
Mental Health	MH	State of emotional and psychological well-being in which an individual is able to use his or her cognitive and emotional capabilities, function in society, and meet the ordinary demands of everyday life.
Notice of Funding Availability	NOFA	An announcement of funding available for a particular program or activity. See also Super NOFA.
Other Permanent Housing	OPH	Consists of Permanent Housing – Housing with Services (no disability required for entry) and PH – Housing Only.

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

Penetration Testing		The process of probing a computer system with the goal of identifying security vulnerabilities in a network and the extent to which outside parties might exploit them.
Performance Assessment Rating Tool	PART	Developed to assess and improve program performance so that the Federal government can achieve better results. A PART review helps identify a program's strengths and weaknesses to in-form funding and management decisions aimed at making the program more effective. The PART therefore looks at all factors that affect and reflect program performance including program purpose and design; performance measurement, evaluations, and strategic planning; program management; and program results. Because the PART includes a consistent series of analytical questions, it allows programs to show improvements over time, and allows comparisons between similar programs.

Performance Measures		A process that systematically evaluates whether your program's efforts are making an impact on the clients you are serving.
Permanent Supportive Housing	PSH	Long-term, community-based housing that has supportive services for homeless persons with disabilities. This type of supportive housing enables the special needs populations to live independently as possible in a permanent setting.
Personal Protected Information	PPI	Information that can be used to uniquely identify, contact or locate a single person, or may enable disclosure of personal information.
Point in Time	PIT	A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count every other year in the last week of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds.
Privacy Notice		A written, public statement of an agency's privacy practices. A no-tice informs clients of how personal information is used and dis-closed. According to the HMIS Data and Technical Standards, all covered homeless organizations must have a privacy notice.
Program Data Element	PDE	Data elements required for programs that receive funding under the McKinney-Vento Homeless Assistance Act and complete the Annual Performance Reports (APRs).
Prospective Member Agency		An agency whose leadership has inquired about joining HMIS.
Race		Identification within five racial categories: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White.
Release of Information	ROI	In the United States, HIPAA and State guidelines strongly direct the rules and regulations of patient information. ROI departments perform such tasks as obtaining patient consent, certifying medical records, and deciding what information can be released. The ROI, also known as written consent, embodies the element of informed consent in a written form. A client completes and signs a document consenting to an understanding of the options and risks of participating or sharing data in an HMIS system. The signed document is then kept on file at the agency.
Runaway and Homeless Youth Management Information System	RHYMIS	An automated information tool designed to capture data on the runaway and homeless youth being served by FYSB's Basic Center Program and Transitional Living Program for Older Homeless Youth (TLP). RHYMIS also captures information on the contacts made by the Street Outreach Program grantees and the brief service contacts made with youth or families calling the FYSB programs.
SAGE HMIS Reporting Repository	SAGE	Effective April 2017, HUD began requiring CoC homeless assistance grant recipients to submit their APR data through a new online system – the Sage HMIS Reporting Repository. Grantees will no longer submit APRs in *e-snaps*. This change in systems applies to all CoC homeless assistance grants regardless of when they were initially funded. Resources for submitting APRs in Sage are available on the HUD Website.
Scan Cards		Some communities use identification (ID) cards with bar codes to reduce intake time by electronically scanning ID cards to register clients in a bed for a night. These ID cards are commonly referred to as scan cards.
Shelter Plus Care (McKinney-Vento Program)	S+C	A program that provides grants for rental assistance for homeless persons with disabilities through four component programs: Tenant, Sponsor, Project, and Single Room Occupancy (SRO) Rental Assistance.

Single Room Occupancy	SRO	A residential property that includes multiple single room dwelling units. Each unit is for occupancy by a single eligible individual. The unit need not, but may, contain food preparation or sanitary facilities, or both. It provides rental assistance on behalf of homeless individuals in connection with moderate rehabilitation of SRO dwellings.

Social Security Number	SSN	A 9-digit number issued by the Social Security Administration to individuals who are citizens, permanent residents, and temporary (working) residents.
Special Notice of Funding Oppurtunity	Super NOFO	The purpose of this Special NOFO to Address Unsheltered and Rural Homelessness (Special NOFO) is to target efforts to reduce unsheltered homelessness, particularly in communities with very high levels of unsheltered homelessness and homelessness in rural areas. Through this Special NOFO, HUD will award funding to communities to implement coordinated approaches grounded in Housing First and public health principles to reduce the prevalence of unsheltered homelessness, and improve services engagement, health outcomes, and housing stability among highly vulnerable unsheltered individuals and families.
Super Notice of Funding Availability	Super NOFA	The consolidation of all of HUD`s homeless grant programs into one notice of funding availability. The Super NOFA funds the Continuum of Care Program Competition.
Supplemental Security Income	SSI	A monthly stipend provided to aged (legally deemed to be 65 or older), blind, or disabled persons based on need, paid by the U.S. Government.
Supportive Housing Program	SHP	A program that provides housing, including housing units and group quarters that has a supportive environment and includes a planned service component. The HEARTH Act amends the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 *et seq*.) by consolidating and amending three separate homeless assistance programs (the Supportive Housing program, the Shelter Plus Care program, and the Moderate Rehabilitation/Single Room Occupancy program) carried out under title IV of the McKinney-Vento Act into a single grant program called the Continuum of Care Program. The Supportive Housing Program ceased to exist upon implementation of the Continuum of Care program.
Supportive Services		Services that may assist homeless participants in the transition from the streets or shelters into permanent or permanent supportive housing, and that assist persons with living successfully in housing.
Supportive Services Only	SSO	Projects that address the service needs of homeless persons. Projects are classified as this component only if the project sponsor is not also providing housing to the same persons receiving the services. SSO projects may be in a structure or operated independently of a structure, such as street outreach or mobile vans for health care
Technical Assistance	TA	Specialized service or skill that a nonprofit does not possess within the organization, but which it may need in order to operate more effectively. Examples of technical assistance include: Grant writing and other forms for fundraising and/or strategic planning.
Temporary Assistance for Needy Families	TANF	Provides cash assistance to indigent American families with dependent children through the United States Department of Health and Human Services.
Transitional Housing	TH	A project that has its purpose facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months).
Unaccompanied Youth		Minors not in the physical custody of a parent or guardian, including those living in inadequate housing such as shelters, cars, or on the streets. Also includes those who have been denied housing by their families and school-aged unwed mothers who have no housing of their own.
Unduplicated Count		The number of people who are homeless within a specified location and time period. An unduplicated count ensures that individuals are counted only once regardless of the number of times they entered or exited the homeless system or the number of programs in which they participated. Congress directed HUD to develop a strategy for data collection on homelessness so that an unduplicated count of the homeless at the local level could be produced.

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

Universal Data Element	UDE	Data required to be collected from all clients serviced by homeless assistance programs using an HMIS. These data elements include date of birth, gender, race, ethnicity, veteran`s status, and Social Security Number (SSN). These elements are needed for CoCs to understand the basic dynamics of homelessness in their community and for HUD to mee the Congressional directive. A complete listing of all UDEs is included as the first page of the document.

U.S. Department of Health and Human Services	HHS	A Cabinet department of the United States government with the goal of protecting the health of all Americans and providing essential human services.
U.S. Department of Housing and Urban Development	HUD	The Federal agency responsible for national policy and programs that address America's housing needs that improve and develop the Nation's communities, and enforce fair housing laws. HUD's business is helping create a decent home and suitable living environment for all Americans, and it has given America's cities a strong national voice at the Cabinet level.
U.S. Department of Veterans Affairs	VA	A Government run military veteran benefit system. It is responsible for administering programs of veterans' benefits for veterans, their families, and survivors. The benefits provided include disability compensation, pension, education, home loans, life insurance, vocational rehabilitation, survivors' benefits, medical benefits, and burial benefits.
Violence Against Women Act	VAWA	The Violence Against Women Act is a piece of legislation that sought to improve criminal legal and community-based responses to domestic violence, dating violence, sexual assault, and stalking in the United States. Programs range from policies to encourage the prosecution of abusers to victim's services to prevention programs. VAWA helped forge new alliances between police officers, courts, and victim advocates. Based on VAWA requirements, HUD CoC and ESG recipients who are victim service providers are prohibited from entering personally identifying information into HMIS. The data may only be entered into an approved HMIS Comparable Database For assistance in determining if a program is prohibited from entering data into HMIS, see the HMIS Comparable Database Decision Tree Tool.
Youth Homelessness Demonstration Program	YHDP	The Youth Homelessness Demonstration Program is an initiative designed to reduce the number of youth experiencing homelessness. The goal of YHDP is to support selected communities in the development and implementation of a coordinated community approach to preventing and ending youth homelessness. Programs consist of Permanent Supportive Housing, Rapid Re-Housing, Transitional Housing, Coordinated Entry, and Street Outreach.

CDB HMIS Policies & Procedures Manual
COMMUNITY ALLIANCE FOR THE HOMELESS

HUD and HMIS Reports

Report	Acronym	Description
Annual Performance Report	APR	HUD requires Continuum of Care (CoC) recipients (including recipients of funds under the CoC Program, Supportive Housing Program (SHP), Shelter Plus Care (S+C), and Section 8 Moderate Rehabilitation Single Room Occupancy (SRO) Program) to submit Annual Performance Reports (APR) within 90 days from the end of their grant operating year. Beginning April 1, 2017, HUD required all CoC recipients to submit their APRs in Sage HMIS Reporting Repository, regardless of when HUD initially funded their grants. HUD uses the APR to track the progress and performance of HUD-funded grants.
Audit Trail		A record showing who has accessed a computer system and what operations he or she has performed during a given period of time. Most database management systems include an audit trail component.
Emergency Solutions Grant Consolidated Annual Performance and Evaluation Report	ESG CAPER	Recipients with HUD funding received through the Emergency Solutions Grants (ESG) Program are required to submit a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD annually. Data collection for the ESG portion of the CAPER is aligned with the most recent version of the Homeless Management Information System (HMIS) Data Standards.

Report	Acronym	Description
Homelessness PULSE	PULSE	Generated on a quarterly basis, this report, similar to the LSA, provides real-time information on service usage and trends to the Department of Housing and Urban Development.
Housing Inventory Count Reports	HIC	Continuum of Care (CoC) Homeless Assistance Programs Housing Inventory Count Reports provide a snapshot of a CoC's HIC, an inventory of housing conducted annually during the last ten days in January, and are available at the national and state level, as well as for each CoC. The reports tally the number of beds and units available on the night designated for the count by program type, and include beds dedicated to serve persons who are homeless as well as persons in Permanent Supportive Housing.
Housing Opportunities for Persons with AIDS Consolidated Annual Performance and Evaluation Report	HOPWA CAPER	The CAPER report for HOPWA formula grantees provides annual information on program accomplishments that supports program evaluation and the ability to measure program beneficiary outcomes as related to: maintain housing stability; prevent homelessness; and improve access to care and support.
Indian Housing Block Grants Annual Performance Report	IHBG APR	The Annual Performance Report (APR) is a self-assessment prepared by the recipient of an Indian Housing Block Grants (IHBG). The APR is required by Section 404 of the Native American Housing Assistance and Self Determination Act of 1996 (NAHASDA); regulations for the program are published at 24 CFR Part 1000.
Longitudinal Systems Analysis Report	LSA	A critical aspect of the McKinney-Vento homeless assistance act, as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community.
Performance Assessment Rating Tool	PART	Developed to assess and improve program performance so that the Federal government can achieve better results. A PART review helps identify a program's strengths and weaknesses to inform funding and management decisions aimed at making the program more effective. The PART therefore looks at all factors that affect and reflect program performance including program purpose and design; performance measurement, evaluations, and strategic planning; program management; and program results. Because the PART includes a consistent series of analytical questions, it allows programs to show improvements over time, and allows comparisons between similar programs.

Performance Measures		A process that systematically evaluates whether your program's efforts are making an impact on the clients you are serving.
Point in Time	PIT	A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count every other year in the last week of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds.

HUD and Federal Partner Programs, Project Types, and Acronyms

Federal Agencies/Programs	Project Types	Acronym
U.S. Department of Housing and Urban Development -Continuum of Care Program (CoC)	Coordinated Entry (Supportive Services Only)	CE
	Permanent Supportive Housing	PSH
	Rapid Re-Housing	RRH
	Supportive Service Only	SSO
	Transitional Housing	TH
U.S. Department of Housing and Urban Development -Emergency Solutions Grant Program (ESG)	Emergency Shelter	ES
	Homelessness Prevention	HP
	Rapid Rehousing	RRH
	Street Outreach	SO

Federal Agencies/Programs	Project Types	Acronym
U.S. Department of Housing and Urban Development -Housing Opportunities for Persons with AIDS Program (HOPWA)	Hotel/Motel (Emergency Shelter)	H/M
	Housing Information (Services Only)	HI
	Permanent Housing Facility Based (PH-Permanent Supportive Housing)	PH-FB
	Permanent Housing Tenant Based (PH-Permanent Supportive Housing	PH-TBRA
	Permanent Housing Placement (Services Only)	PHP
	Short-Term Housing (Emergency Shelter)	STH
	Short Term Rent, Mortgage, Utility Assistance (Services Only)	STRMU
	Supportive Services Only (Services Only)	SS
	Transitional Housing	TH
U.S. Department of Housing and Urban Development - Veterans Affairs Supportive Housing (HUD-VASH)	HUD: HUD/VASH (PH-Permanent Supportive Housing)	HUD-VASH
U.S. Department of Health and Human Services (HHS)- Substance Abuse and Mental Health Services Administration (SAMHSA)- Projects for Assistance in Transition from Homelessness (PATH)	Street Outreach	SO
	Supportive Services	SS
U.S. Department of Health and Human Services (HHS) - Administration for Children and Families (ACF) - Family and Youth Services Bureau (FYSB): Runaway and Homeless Youth (RHY) Program	Street Outreach Program (Street Outreach)	SOP
	Basic Center Program-Prevention (Homelessness Prevention)	BCP-HP
	Basic Center Program-Emergency Shelter (Emergency Shelter)	BCP-ES
	Basic Center Program-Host Home Shelter (Emergency Shelter)	BCP-HH

	Transitional Living Program (Transitional Housing)	TLP
	Maternity Group Home (Transitional Housing)	MGH-TH
	Demonstration Grant (Transitional Housing)	DG-TH
U.S. Department of Veterans Affairs- Grant and Per Diem Program (GPD)	Bridge Housing (Transitional Housing)	BH
	Low Demand (Safe Haven)	LD
	Service Intensive Transitional Housing (Transitional Housing)	SITH
	Hospital to Housing (Transitional Housing)	HTH
	Clinical Treatment (Transitional Housing)	CT
	Case Management and Housing Retention (Services Only)	CM/HR

	Transition in Place (Permanent Housing-Housing Only)	TIP
U.S. Department of Veterans Affairs- Healthcare for Homeless Veterans Contract Emergency Housing	Emergency Shelter	HCHV CRS: EH
U.S. Department of Veterans Affairs- Healthcare for Homeless Veterans Community Contract Safe Haven	Safe Haven	HCHV: Low Demand
U.S. Department of Veterans Affairs- Supportive Services for Veteran Families	Rapid Rehousing	SSVF-RRH
	Homelessness Prevention	SSVF-HP

Universal Data Elements

HMIS Universal Data Elements are elements required to be collected by all projects participating in HMIS-CDB, regardless of funding source. Projects funded by any one or more of the Federal Partners must collect the Universal Data Elements, as do projects that are not funded by any Federal Partner (e.g. missions) but have agreed to enter data as part of the Continuum of Care's HMIS-CDB implementation. The Universal Data Elements 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 homelessness, and patterns of service use, including information on shelter stays and homelessness over time. The Universal Data Elements include:

Name	Project Start Date
Social Security Number	Project Exit Date
Date of Birth	Destination
Race	Relationship to Head of Household
Ethnicity	Client Location
Gender	Housing Move-In Date
Veteran Status	Prior Living Situation
Disabling Condition	