NW Social Service Connections
CMIS/HMIS Policies and Procedures

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1. ~INTRODUCTION

Client Management Information System (CMIS)/Homeless Management Information System (HMIS) is a locally administered, multi-jurisdictional, electronic data collection system that stores longitudinal person-level information about persons who access the service system.

City of Portland, Portland Housing Bureau (PHB) has instituted the use of ServicePoint as the CMIS/HMIS system in response to Congressional Directive and U.S. Department of Housing and Urban Development (HUD) support for Homeless Management Information Systems (HMIS).

ServicePoint (trademarked and copyrighted by Bowman Systems) is a web based Client Information System that provides standardized assessment of a Client's needs, creates individualized service plans and records the use of housing and services which communities can use to determine the utilization of services of participating Service Providers, identify gaps in the local service continuum and develop outcome measurements.

~Throughout this document NWSSC, ServicePoint and CMIS/HMIS may be used interchangeable unless referring to Bowman Systems.

~For more information regarding Client/Homeless Management Information Systems (CMIS/HMIS) Policy and Procedures, please contact the NWSSC ServicePoint Project manager and System Administrator.

2. PROJECT OVERVIEW

~NW Social Service Connections (NWSSC) is the administrative entity that governs a multi Continuum of Care implementation of CMIS/HMIS used to record and share information among service-providers on services provided to clients experiencing homelessness or at risk of homelessness.

~The City of Portland, Portland Housing Bureau (PHB) is the owner and operator of the NWSSC CMIS/HMIS and serves as the NWSSC ServicePoint System Administrator and custodian of data in the system. NWSSC is a collaboration of multiple Continuums of Care and Service System Partnerships in accordance with PHB Intergovernmental Agreements or Memorandums of Understanding.

~The NWSSC ServicePoint System Administrators are dedicated program staffs from PHB, additionally each of the Continuums of Care or Service System Partnerships have identified staff functioning as ServicePoint System Administrators for their respective jurisdictions.

3. CONTACT INFORMATION

~NWSSC ServicePoint Project Manager and System Administrator
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~http://www.portlandoregon.gov/phb/hmis

4. PURPOSE

~This document is to define the general requirements and provide an overview of the NWSSC Implementation of ServicePoint.

5. SCOPE

~These Policies and Procedures apply to ALL Persons and Organizations, using any portion of the NWSSC Implementation of ServicePoint.

6. GOVERNING PRINCIPLES

6.1. ~ALL Persons using NWSSC ServicePoint are expected to read, understand, and adhere to any current funder Manuals, Rules, Guides and Tools, even when the materials do not provide specific guidance.

6.2. ~ All Persons using NWSSC ServicePoint for services provided to clients experiencing homelessness or at risk of homelessness are expected to read, understand, and adhere to the current HMIS Guides and Tools (unless the organization has received an exemption) are expected to read, understand, and adhere to the current HMIS Guides and Tools including the HMIS Data Standards manual https://www.hudexchange.info/hmis/guides/

6.3. ~ALL Persons using NWSSC ServicePoint are expected to read, understand, and adhere to the spirit of these principles, even when the Policies and Procedures do not provide specific direction.

6.4. ~All information entered into NWSSC ServicePoint, the Service Providers, Participants, their respective staff, and end users are bound by all applicable federal and state confidentiality regulations and laws

that protect the Client, according to the organization's requirements, in accordance with the Participation Agreement.

6.5. Clients may not be denied access to their own records. Clients have the right to see their information on ServicePoint, within the time frame specified in the Privacy Notice to Clients. If a Client requests, the Participant/User must review the information with the client.

6.6. Bowman Internet Systems will host our implementation of ServicePoint; all Client information in ServicePoint is encrypted.

6.7. Confidentiality

6.7.1. ~The rights and privileges of clients are crucial to the success of NWSSC ServicePoint. These policies will ensure clients' privacy without impacting the delivery of services, which is the primary focus of agency programs participating in this project.

6.7.2. Policies regarding client data are founded on the premise that a client owns his/her own personal information and provide the necessary safeguards to protect client, agency, and policy level interests.

6.8. Data Integrity

6.8.1. ~Client data is the most valuable and sensitive asset of NWSSC ServicePoint. These policies will ensure integrity and protect this asset from accidental or intentional unauthorized modification, destruction or disclosure.

6.9. System Availability

6.9.1. The availability of a centralized data repository is necessary to achieve the ultimate system/community wide aggregation of unduplicated statistics. The System Administrators are responsible for ensuring the broadest deployment and availability for participating service providers.

6.10. Compliance

6.10.1. Violation of the policies and procedures set forth in this document will have serious consequences, which include but are not be limited to: suspension of your access, permanent loss access, loss of employment, or legal action. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity may result in the withdrawal of system access for the offending entity.

7. DEFINITIONS

7.1. ~Refer to current HMIS Guides and Tools including the HMIS Data Standards manual https://www.hudexchange.info/hmis/guides/

7.2. ~Refer to Community Data Standards Definitions for terms commonly used throughout the NWSSC implementation but are not included in HUD definitions http://www.portlandoregon.gov/phb/HMIS

7.3. Refer to funder or program documentation for terms used by those funders or programs.

8. EQUIPMENT, MATERIALS AND SUPPLIES

8.1. ~Participating Agencies are responsible for providing their own technical support for all Hardware and Software systems used to connect to ServicePoint.

8.2. ~Minimum hardware and software requirements for workstations exist, contact your local administrator or the NWSSC ServicePoint Project manager for more information

9. ~FORMS and DOCUMENTS (incorporated by addendum and subject to change)

9.1. ~Electronic versions are made available on http://www.portlandoregon.gov/phb/HMIS

9.1.1. ~HMIS Guides and Tools

9.1.2.~Agency Agreement
9.1.3.~Data Sharing Addendum
9.1.4.User Agreement
9.1.5.~Privacy Notice
9.1.6.Community Data Standards
9.1.7.~Client Consent Form/Release of Information Authorization Form

10. CONFIDENTIALITY & SECURITY

10.1. ~ServicePoint System Administrators have full and complete access to all ServicePoint features and functions for their respective jurisdictions. If it is requested, the ServicePoint System Administrators must be willing to sign the confidentiality oaths of the Affiliated Service Providers.

10.2. For all information entered in the CMIS/HMIS system the Service Providers, Users and Agencies are bound by all applicable federal and state confidentiality regulations and laws that protect the Client records that will be placed on the CMIS/HMIS system.

10.3. ~CMIS/HMIS Service Providers and Users have a primary duty to protect the confidentiality and security of client records. Client Consent to Share or Release of Information (ROI) forms are required to electronically share information in ServicePoint. It is the Service Provider using the CMIS/HMIS system responsibility to verify that a current signed copy ROI is on file. The ROI must be signed by the client or authorized client representative. A general release of all client information is prohibited.

10.4. ~In the event the request is in the form of a subpoena, the Service Provider shall immediately notify the local System Administrator, who in turn shall immediately notify the **NWSSC ServicePoint Project Manager/** System Administrator for assistance. This includes a review of the validity of the request and obtaining only the information identified in the request. Hard copy releases are not required in the event a valid subpoena is received unless the law prohibits disclosure of the information without a signed release.

10.5. The Service Provider shall ensure that all staff, volunteers and other persons are issued a unique User ID and password for CMIS/HMIS and receive confidentiality training on the use of CMIS/HMIS and applicable confidentiality laws.

10.5.1. The Service Provider is responsible to contact the Agency or System Administrator for revoking, adding or editing User access in a timely manner.

10.5.2. ~The Service Provider is responsible to ensure all Users receive appropriate ServicePoint, Privacy, Security, Confidentiality and other required training

10.6. Unauthorized disclosure of Protected Personal Information (PPI) may be grounds for legal action.

10.7. ~Privacy Rules, including but not limited to HIPAA, 42CFR Part2, FERPA, take precedence over CMIS/HMIS privacy standards. If an agency is a covered agency, they must abide by those regulations.

10.8. ~Creating anonymous records may mean that reports will not provide a true unduplicated count and therefore this option should only be used if absolutely necessary. Please contact your local System Administrator for other options.

10.9. ~ServicePoint shall only be accessed from the Organization's network, desktops, laptops, mini-computers and any other electronic devices that are web capable. In special circumstances access from remote locations, networks and hardware may be permitted after application and approval by both the Agency and System Administrators.

10.9.1. ~NWSSC System Administrators are allowed to access the database from remote locations via only a secure network for purposes specific to their job. All staff that access the database remotely may only access it for activities directly related to their job. These approved remote locations may include but are not limited to:

10.9.1.1. Private Home office to provide system support as needed.
10.9.1.2. Community Agency offices to support agency use of the system.
10.9.1.3. Private Hotel Rooms on secure networks when providing services while in the field.
10.9.1.4. Training Centers when providing services in the field.

10.10. ~Remote Access (In special circumstances access from remote locations may be permitted after application and approval by both Agency and System Administrators)

10.10.1. The ServicePoint Remote Access Agreement must be completed and submitted for approval.

10.10.2. The Agency Administrator must review the need for remote access and investigate other options.

10.10.3. If no other valid options are available the Agency Administrator must approve in writing remote access for a user.

10.10.4. Once remote access agreement has been approved and signed by the Agency Administrator a copy will be filed with the System Administrators for final approval.

10.10.5. Remote Access is subject to change at the NWSSC System Administrator's discretion.

10.10.6. Agency and System Administrators will periodically audit all remote access.

10.11. Public Key Infrastructure (PKI)

10.11.1. When a computer is used for ServicePoint, the Service Provider is responsible to contact the System Administrator for the PKI Certificate, password and installation instructions.

10.11.2. When a computer is no longer used for Service Point, the service provider needs to remove the PKI Security Certificate.

11. ROLES AND RESPONSIBILITIES

11.1. ~If it is requested of the CMIS/HMIS system administrators they must be willing to sign the confidentiality oaths of the Affiliated Service Providers.

11.2. PHB and the NWSSC System Administrator

11.2.1. ~Liaison with CMIS/HMIS Software Vendor
11.2.2. ~Project Staffing for CMIS/HMIS implementation
11.2.3. Overall Responsibility For Success Of NWSSC CMIS/HMIS
11.2.4. Creation Of NWSSC Project Forms And Documentation
11.2.5. NWSSC Project Policies And Procedures And Compliance
11.2.6. Keeper Of Signed Memorandums Of Understanding and Intergovernmental Agreements
11.2.7. Procurement/Renewal of Server Software And Licenses

11.3. ~ALL (CMIS/HMIS) Lead Organizations

11.3.1. Liaison with NWSSC System Administrator
11.3.2. ~Project Staffing for Continuum of Care and respective jurisdictions
11.3.3. Creation of Local project Forms and Documentation
11.3.4. ~Data quality reviews for their respective jurisdiction
11.3.4.1. Data Quality
11.3.4.2. Data Validity
11.3.4.3. Data Completeness
11.3.5. ~Adherence to all HUD HMIS Standards and Rules
11.3.6. Adherence to Community Data Standards
11.3.7. ~Adherence to Program Data Standards
11.3.8. User Administration
11.3.8.1. Manage User Licenses
11.3.8.2. Process User Agreement forms

11.3.9. Training
11.3.9.1. Curriculum Development
11.3.9.2. Training Documentation
11.3.9.3. Confidentiality Training
11.3.9.4. ~Training For Agency Administrators and End Users
11.3.9.5. New Provider training
11.3.9.6. Upgrade, enhancement, refresher or other training
11.3.10. Outreach/End User Support/Technical Assistance/Password Resets
11.3.10.1. Password Resets require some sort of user Identity verification.
11.3.11. ~Coordinate any application customization requests with the NWSSC ServicePoint Project Manager and System Administrator
11.3.12. ~Will use aligned universal naming conventions, in order to better standardize, when creating new assessment questions, sub-assessments, and any other system wide modifications.
11.3.13. ~All Local documentation including P&Ps and agreements must be no less restrictive than NWSSC ServicePoint CMIS/HMIS documents.

11.4. ~Participating or Contributory CMIS/HMIS Organization (CHO) Responsibilities:

11.4.1. The CHO must make available to users a secure system to access ServicePoint, including but not limited to firewall and virus protection.
11.4.2. The CHO must be current all related contracts.
11.4.3. ~The CHO shall follow, comply with and enforce applicable Agency Participation Agreement.
11.4.4. ~The CHO shall abide by applicable data standards and applicable policies and procedures.
11.4.5. ~The CHO shall keep abreast of all ServicePoint updates and policy changes. Providing accurate contact information to system administrators.
11.4.6. The CHO shall identify and approve their respective Agency Users.
11.4.7. The CHO shall designate one User to be the Agency's Key User/Agency Administrator.
11.4.8. The CHO shall be responsible for entering Client data (profile, household, needs, services, referrals, any other Client data you may require), following up on referrals, and running reports in a timely manner.
11.4.9. ~The CHO shall have appropriate representation at agency administrators/regional data quality review meetings.
11.4.10. ~The CHO shall collect data on all clients as called out in the Data Element Matrix, no less that the HUD Universal Data Elements (UDE) and any funder required Program Specific Data Elements (PSDE), except where CHO is granted an exception.
11.4.11. CHO Exceptions may include non-homeless CMIS organizations, and DV Comparable database organizations. Please contact the System Administrator for information and waiver.

11.5. User Responsibilities:

11.5.1. ~The User shall provide an email contact address to the System Administrators for communication purposes.
11.5.2. The User shall follow, comply with and enforce the User Agreement.
11.5.3. ~The User shall comply with applicable HMIS standards and rules, policies and procedures.
11.5.4. Each User is provided with an access level as required by his/her role. This access level controls who can see which information, lower levels of access allow ONLY viewing of basic demographics, while the middle levels of access allow additional information to be viewed. The highest levels of access are limited to administrators. Confidentiality is a primary concern and these levels of access help control access to information.
11.5.5. ~Every User of the CMIS/HMIS system is authenticated with a unique User ID and password. This provides a level of security and accountability for the CHO's database. Sharing of User IDs or passwords is <u>forbidden</u>.

11.5.6. The User shall only enter individuals in the CMIS/HMIS database that exist as Clients under the Service Provider's approved area of service. The User shall not misrepresent its Client base in the CMIS/HMIS database by entering known, inaccurate information. The User shall not knowingly enter false or misleading data under any circumstances.

11.5.7. ~The User shall consistently enter information into the CMIS/HMIS database and will strive for Real Time or Near Real Time data entry.

11.5.8. ~The User will not alter information, with known inaccurate information, in the CMIS/HMIS database that has been entered by another Service Provider (i.e. Service Provider will not purposefully enter inaccurate information to over-ride information entered by another Service Provider). Verifiable third party documentation (including but driver license, paystub, etc …) is recommended before updating existing information.

11.5.9. The User shall utilize the CMIS/HMIS database for business purposes only.

11.5.10. The User shall not use the CMIS/HMIS database with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.

11.5.11. The User shall not cause in any manner, or way, corruption of the CMIS/HMIS database in any manner.

11.5.12. In the event that data entry cannot be made Real Time and the User utilizes hard copy paper forms, once the data has been entered into CMIS/HMIS, the forms shall be securely stored or suitably disposed of.

11.5.13. The User shall enter data into CMIS/HMIS

11.5.13.1. Universal Data elements shall be entered on all Clients.

11.5.13.1.1. ~In addition to the Universal Data elements all HUD Funded CHO Users, at a minimum, any funder required Program Specific Data Elements (PSDE).

11.5.13.1.2. ~In addition to the Universal Data elements all Non-HUD funded CHO Users, at a minimum, shall also enter PSDE as required or called out in the Data Element Matrix or directed by funders.

11.5.14. ~Electronic sharing of data is optional but entering data is not optional.

11.5.15. The User is responsible for data entry accuracy and correctness.

11.5.16. The User shall log off the CMIS/HMIS and shut down the browser when not using CMIS/HMIS.

11.5.17. The User shall utilize the password protected screen savers that automatically turn on to mitigate the burden of shutting down the workstation when momentarily stepping away from the work area.

11.5.18. ~Report any discrepancies in the use of the NWSSC CMIS/HMIS system, including without limitation access of information and entry of information, to the Service Provider Key User or to the System Administrator.

11.5.19. The User shall periodically, when instructed by the Agency or System Administrator, run and review audit reports, making corrections to ensure data accuracy and completeness.

11.6. Key User/Agency Administrator Responsibilities:

11.6.1. The Key User/Agency Administrator shall observe all User Responsibilities.

11.6.2. ~The Key User/Agency Administrator shall use Agency NewsFlash only for distribution of appropriate CMIS/HMIS information.

11.6.3. The Key User/Agency Administrator shall act as the first level of Service Provider administration and support in the CMIS/HMIS system.

11.6.4. The Key User/Agency Administrator shall be responsible for the initial training of new Users in his/her Agency.

11.6.5. The Key User/Agency Administrator shall regularly run and review audit reports to ensure policies are being followed by staff.

11.6.6. The Key User/Agency Administrator will be responsible for monitoring all User access within their own Agency.

11.7. ~ServicePoint Agency Administrator Group

11.7.1. ~Agency Administrator Group will be established for the purpose of addressing implementation and ongoing operational issues.
11.7.2. ~Identify and prioritizing system enhancements
11.7.3. ~Providing feedback on system performance
11.7.4. ~Brainstorming the best uses of the HMIS
11.7.5. ~Regularly reviewing compliance with all NWSSC HMIS policies, agreements, and other requirements
11.7.6. ~Reviewing data quality and providing feedback to improve data quality

11.8. ~NWSSC Oversight Group

11.8.1. ~Is made up of at least 1 representative from each of the lead organizations of the NWSSC CMIS/HMIS and other participant representatives or advocates as invited by the NWSSC Administrators.
11.8.2. ~Review and make recommendations on all NWSSC HMIS documents, attachments, and related forms
11.8.3. ~Identify and prioritize system enhancements
11.8.4. ~Determine the guiding principles that should underlie the HMIS implementation activities of the project and participating organization and service programs
11.8.5. ~Encourage continuum-wide provider participation
11.8.6. ~Facilitate consumer involvement
11.8.7. ~Recommend criteria, standards, and parameters for the usage and release of all data collected as part of the HMIS
11.8.8. ~Recommend continuum-level mechanisms for monitoring and enforcing compliance with the approved policies and procedures
11.8.9. ~Enhance the implementation and operations of the system for service-providers so they can protect the interests and privacy of their clients
11.8.10. ~Enhance and improve the quality of data being reported to various levels throughout the Continuum
11.8.11. ~Create and implement procedures for additional system issues for Participating Agencies.

12. ~DATA STANDARDS, GUIDES AND TOOLS

12.1.~HUD Provides resources intended to assist in the implementation and maintenance of HMIS/CMIS HMIS Guides and Tools (https://www.hudexchange.info/hmis/guides/)

12.2. ~ Local Community Data Standards, may be created or revised at the discretion of the Local System Administrator

12.3. ~Local Data Element Matrix, may be created or revised at the discretion of the Local System Administrator

13. DATA EXPECTATIONS

13.1. ~Communities may identify specific local expectations in regards to data elements, timeliness, and data completeness measures

13.2.~Communities with multiple grantees of same program funds may share Client, UDE and PSDE data in ServicePoint as provided within any applicable grant agreement, partnership or other collaborative arrangements

13.3.No outstanding Corrective Actions from last NWSSC CMIS/HMIS Monitoring
13.4. Additional exceptions may be considered by the Local System Administrator.

14. REPORTS/DATA SUBMISSIONS

14.1. ~System or Community Wide aggregate reporting is done on a regular basis without notification.
14.1.1. ~Electronic Data Transfers of data either into or out of ServicePoint may occur at any time. Transfers of data into ServicePoint require approval and appropriate agreements.
14.2.The Service Provider/User's access to data about Clients it does not serve shall be limited based on the current status of any release of information on file.
14.3. ~The general public can request non-identifying aggregate and statistical data, by submitting a data request. Local administrators should be contacted for any public request. Systemwide aggregate report requests should sent to NWSSC ServicePoint System Administrator.
14.4.Non identifying aggregate and statistical data will not contain outliers. Outliers may be removed if they represent less than 5% of any value.
14.5.At a minimum, Password secure any document that includes client name or other PPI. Do not email the password with the file.
14.6.~Reports downloaded to workstations or other, should not include PPI. If Client data is saved to workstation, files must be securely deleted.
14.7.The CMIS/HMIS System Administrator will address all requests for system or community wide data from entities other than Affiliated Service Providers or clients.
14.8.~The System Administrator may run system-wide reports to assess the data, quality and level of participation by Affiliated Service Providers. Results of these reports may be shared with Affiliated Service Providers.
14.9.~The System Administrator may run reports for research use. Information in NWSSC CMIS/HMIS may be used to conduct research related to homelessness and housing programs, service needs, income supports, education and employment, and program effectiveness. Client names and social security numbers will never appear on a research report. Research agreement must be executed.

15. PRIVACY REQUIREMENTS

15.1. The CHO must post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting this information.
15.2.The CHO must publish a privacy notice describing its policies and practices for the processing of PPI and must provide a copy of its privacy notice to any individual upon request.
15.3. The CHO must specify in its privacy notice the purposes for which it collects PPI and must describe all uses and disclosures.
15.4.If the CHO maintains a public web page, the CHO must post the current version of its privacy notice on the web page.
15.5.The CHO must post a sign stating the availability of its privacy notice to any individual who requests a copy.
15.6.The CHO must maintain permanent documentation of all privacy notice amendments.
15.7.The CHO must allow an individual to inspect and to have a copy of any PPI about the individual.
15.8.The CHO must offer to explain any information that the individual does not understand.
15.9.The CHO must consider any request by an individual for correction of inaccurate or incomplete PPI pertaining to the individual, The CHO is not required to remove such information but they may mark such information as inaccurate or incomplete or supplement such information.

15.10. The CHO must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to sign a confidentiality agreement that acknowledges receipt of a copy of the privacy notice and that pledges to comply with the privacy notice.
15.11. ~The CHO must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to undergo annual formal training in privacy requirements.
15.12. The CHO must establish a method, such as an internal audit, for regularly reviewing compliance with its privacy notice.
15.13. The CHO must establish an internal or external appeal process for hearing an appeal of a privacy complaint or an appeal of denial of access or correction rights.
15.14. The CHO must protect CMIS/HMIS system from malicious intrusion behind a secure firewall.
15.15. The CHO must secure any paper or other hard copy containing PPI that is either generated by or for CMIS/HMIS, including, but not limited to report, data entry forms and signed consent forms.

REVISION HISTORY

Version	Date	Description	Author
3	01/12/2011	Reformat Entire P&P Document; Update to reflect changes from Homeless Management Information System (HMIS) Data Standards – Revised Notice – March 2010; Incorporate "CMIS" language; Add references to additional supporting documentation; Community Review/Input 09/23/2010 Legal Review 12/28/2010	W. Smith
4	07/25/2011	See ~ 2. Revised the Project Overview 3. Changed from System Administrator to "NWSSC Project Manager and System Administrator" 7.2 Removed Portland Specific Language 9.9 added "(Hard Copy)" 10.3 Rewrote section on requests for release of client level information including subpoenas added a new 10.4 and renumbered remainder of document 10.9 Renumbered (10.10) added the word prescribed to allow for use of personal workstations when directed by the Organization. 11.5.13.1.2 & 11.5.13.1.3 removed due to Portland Specific Language. 11.5.13.1.4 Renumbered to 11.5.13.1.2 and will accommodate the Portland specific needs. 11.5.14 Removed last sentence. 12.3, 12.4 changed to read "Local System Administrator" 13.7 added "Additional exceptions may be considered by the Local System Administrator" Added 14.1.1.3 "Bridges to Housing" resulting in renumbering of 14.1.1.3 to 14.1.1.4 15.10 removed (annually or otherwise)	W. Smith
5	06/01/2016	Removed v.4 ~ See new ~ throughout document to indicate updates, revisions, and additions. Presented to AHFE Board and approved.	

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