



LA BOSCOG HMIS Policies and Procedures

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1 Introductions

These Policies and Procedures are developed to guide the operation of the Louisiana Balance of State Homeless Management Information System (LA BOSCOCO HMIS). The LA BOSCOCO HMIS is a web-based database used by homeless service organizations across the Louisiana Balance of State COC to collect client-level data on households experiencing or at risk of homelessness. The administration of an HMIS is a mandate from the federal Department of Housing and Urban Development (HUD).

HUD's Office of Special Needs Assistance Programs outlined a set of goals for the field of homelessness assistance, and three strategy areas where communities should examine their current state and track progress toward an advanced state. HMIS plays an important role in communities' achievement of these goals.

Strategy 1: Improve the capacity of people setting up, operating, and benefitting from data systems.

Strategy 2: Data systems collect accurate, comprehensive, and timely data.

Strategy 3: Continuums and partners use data to improve efforts to end homelessness.

Guidance for the implementation of HMIS is provided by a broad-based HMIS Committee. The HMIS committee work closely with the HMIS Lead Agency to secure funding, set and manage priorities within available funding, collect and incorporate user feedback, and provide appropriate oversight and guidance. The committee is open to all stakeholders who may wish to participate in the direction of the HMIS. Meeting information is available on the LA BOSCOCO HMIS website.

This document provides the policy guidelines and standards that govern HMIS operations, as executed by the Lead Agency and Local System Administrators and describes the responsibilities of Partner Agencies and users.

A. Policy Disclaimers and Updates

Operating Procedures defined in this document represent the minimum standards of participation on the LA BOSCOCO HMIS project and represent general "best practice" operational procedures. Operational standards in this document are not intended to supersede grant specific requirements and operating procedures as required by funding entities.

The LA BOSCOCO HMIS Policies and Procedures are updated routinely as HUD publishes additional guidance or as part of an annual review. To allow for evolution of compliance standards without re-issuing core agreements, updated policies supersede related policies in any previously published LA BOSCOCO Policies and Procedures documents, HMIS Committee procedures, or agreements. Upon revision of these policies, any changes from the previous year will be highlighted. A current copy of the LA BOSCOCO MSHMIS Policies and Procedures may also be found on the LA BOSCOCO website <https://laboscoc.org/home>.



This version of the HMIS Policies and Procedures was adopted by the LA BOSCOG HMIS Governing Board on October 3, 2023.

2 Federal HMIS Policies

In addition to the HMIS Policies contained herein, LA BOSCOG HMIS must also comply with federal HMIS requirements. These requirements are detailed in a suite of HMIS Data Standard resources, an overview of which is provided below:

[HMIS Data Standards Dictionary](#)

The manual provides the detailed information required for system programming on all HMIS elements and responses required to be included in HMIS software. It delineates data collection requirements, system logic, and contains the XML and CSV tables and numbers. The manual also includes critical information about data collection stages, federal partner data collection required elements, and metadata data elements.

[HMIS Data Standards Manual](#)

The manual provides a review of all the Universal Data Elements and Program Descriptor Data Elements. It contains information on data collection requirements, instructions for data collection, and descriptions that the HMIS User will find as a reference.

[2004 HMIS Data and Technical Standards Final Notice](#)

HUD document about confidentiality of personal information and uses and disclosures of data in HMIS.

HMIS Federal Partner Program Manuals contain additional detailed information on HMIS project setup and data collection for federally funded programs:

- [CoC Program Manual](#)
- [ESG Program Manual](#)
- [HOPWA Program Manual](#)
- [PATH Program Manual](#)
- [RHY Program Manual](#)
- [VA Program Manual](#)
- [YHDP Program Manual](#)

These documents are periodically reviewed/updated every other year, with changes effective October 1.



3 LSNDNC

Louisiana Services Network Data Consortium (LSNDC)

All HMIS Leads and Continuums of Care in the State of Louisiana use Community Services® and collaborate, participate, and contribute data into the statewide system. The statewide HMIS administration is administered by the Louisiana Services Network Data Consortium, a non-profit corporation acting on behalf of the LSNDNC Board.

The LSNDNC Board is composed of representatives from regional Homeless Management Information System (HMIS) lead agencies and Continua of Care lead organizations that are under contract with the U.S Department of Housing and Urban Development (HUD) to provide homeless services. The central server is administered by the contracted HMIS software vendor, and the LSNDNC establishes the minimum policies for appropriate administration, licensing, training, and compliance at the regional-level.

The LA BOSCOCC has two representatives on the LSNDNC board. One representative will be appointed by the LA BOSCOCC Collaborative Applicant as the COC representative. The HMIS Lead will appoint the other representative with an emphasis on system administration expertise. The process for system administration appointment is detailed in the HMIS Policies and Procedures.

At least annually, the HMIS Lead will assess the performance of the HMIS Lead LSNDNC appointee. If a replacement is recommended, or if a vacancy exists, the Lead will review potential appointees with an emphasis on system administration expertise. The HMIS Lead has the authority to approve one of the current nominations or request additional nominations based on its decision. Both LSNDNC representative positions should be filled within two months of the vacancy.

The Collaborative Applicant has the authority to develop its own appointee process other than complying with the 2-month time limit for vacancies.

All guidance in the manual complies with HMIS governance established in the LA BOSCOCC Governance Charter. In addition, this manual meets the minimum standards detailed in the LSNDNC Policies and Procedures where applicable. If the LA BOSCOCC recommends changes to the HMIS policies and procedures which does not follow the LSNDNC policies and procedures, the following actions are recommended prior to adopting the changes. The two LSNDNC representatives from the LA BOSCOCC should request a review of the suggest changes during the next LSNDNC Board meeting. If the LSNDNC Board agrees to the recommended changes of the LSNDNC policies and procedures, then once adopted, the LA BOSCOCC may move forward with revisions to their HMIS policies and procedures including the privacy, security and data quality plans.

LSNDNC Statewide System Administration Responsibilities

The LSNDNC Board, or its appointed committee, will identify a lead organization that is positioned to furnish release time for a Regional LSNDNC System Administrator to perform the duties of the LSNDNC State System Administrator for up to a maximum of 250 hours per fiscal year. The State Administrator(s) will be responsible for providing management and supervision of the LSNDNC HMIS Statewide System and



has full access to all user and administrative functions across the State. Statewide system administrator services are necessary for executing practices and policies set by the LSNDC Board and providing direct support to Regional LSNDC System Administrators. In the absence of the State LSNDC System Administrator(s), the LSNDC Board President and/or the Executive Committee will designate a back-up staff person, until a new State Administrator is established.

4 HMIS Governance

HMIS governance documents, including all agreements, should refer to each other and ensure collectively that there are no contradictions in the expectations for compliance to HUD, LSNDC and the LA BOSCOG HMIS policies and procedures. Collectively, HMIS documents should provide clear and transparent language and be available either through the LA BOSCOG website or printed document.

4.1 HMIS Lead Selection and HMIS Vendor Selection

HMIS Lead Selection

The Louisiana Housing Corporation (LHC) is the designated HMIS Lead for the LA BOSCOG. The LA BOSCOG board is responsible for selecting the HMIS Lead and conducting an ongoing annual monitoring and review of the HMIS Lead. In addition, the HMIS Lead may delineate all or part of the HMIS system administration to a sub recipient or contractor, and these parties will be subject to the monitoring process. Additional monitoring processes are located in [here](#).

HMIS Vendor Selection

The designated HMIS software tool for LA BOSCOG is Community Services by WellSky® of Overland Park, Kansas, and operated by the Louisiana Service Network Data Consortium (LSNDC). Currently, all HMIS Leads and Continuums of Care in the State of Louisiana use Community Services and collaborate, participate, and contribute data into the statewide system. The Vendor and Software will be reviewed for HUD and contract compliance and continued use at least annually by the LA BOSCOG HMIS Steering Committee.

Based on the monitoring, the HMIS Committee may recommend to the LA BOSCOG Board initiation of procurement for HMIS software. Any process to procure a vendor must be approved by the LA BOSCOG Board and approved by the CoC membership. Procurement may result in a renegotiated contract with the current vendor.

4.2 Assessing Fees

The LA BOSCOG currently does not charge user fees for access to the HMIS. User Fee assessment will be reviewed annually by the HMIS Lead. The lead will base this review on current resources and expenses associated with operating the system within HUD requirements. Any User fee adjustment must be approved by the CoC Membership prior to implementation.

Upon approval of a user fee structure (if necessary), the LA BOSCOG will notify each Partner Agency of annual costs. The HMIS lead will invoice all Partner agencies according to the approved fee structure effective at the beginning of the COC operating year. Fees must be paid within 90 days of receipt of the



invoice. Failure to pay the fees may result in inactivation of any user account under the Partner Agency. Prior to deactivation of accounts, the HMIS Lead should refer the agency to the HMIS committee for adjudication.

The HMIS Lead has discretion to establishing a payment schedule with each Partner Agency as requested.

4.3 Partner Agency Project Types

Partner agencies are also referred to as Covered Homeless Organizations (CHO)s.

Participation is not based on funding source and entities which may use HMIS include, but are not limited to:

- Coordinated Entry Assessors and Priority List Managers;
- Day Shelters and Drop-In Centers for persons who are homeless;
- Emergency Shelters serving homeless adults, families, and youth;
- Transitional Housing programs;
- Permanent Supportive Housing programs;
- Rapid Re-housing programs;
- Street and Community Outreach programs to persons who are experiencing homelessness;
- Supportive Housing programs (whether scattered site or on-site); and
- Supportive Service programs serving persons who are homeless.

Federal partners who fund certain homeless programs within the CoC mandate HMIS participation as a requirement of funding. Partner agencies who receive the following funding within these programs are required to contribute to the HMIS system:

- Department of Housing and Urban Development (HUD)
 - Continuum of Care Program (CoC)
 - Emergency Solutions Grant (ESG)
 - Housing for Persons with AIDS (HOPWA)¹
- Department of Health and Human Services (HHS)
 - Projects for Assistance in the Transition from Homelessness (PATH)
 - Runaway and Homeless Youth Program (RHY)
- Department of Veterans Affairs (VA)
 - Supportive Services for Veteran Families (SSVF)
 - VA Supportive Housing (HUD-VASH)²

¹ Formula and Competitive Programs may enter data into HMIS. Grantees that use homelessness or chronic homelessness in their program design as primary criteria for eligibility must use an HMIS to track the services for their homeless clients.

² VAMC staff are required to use the VA's Homeless Operations Management and Evaluation System (HOMES) database to record HUD-VASH service data. Any VAMC staff use of or entry into HMIS is voluntary. However, there are a select few HUD-VASH Other Than Honorable (OTH) projects, called "HUD-VASH Continuum," that have been



4.4 Roles and Responsibilities

The LA BOSCOCC has established the following roles and responsibilities for operating the regional HMIS implementation. The roles and responsibilities should be reviewed at least annually according to these policies and must be approved by the appropriate authorization.

4.4.1 LA Balance of State Continuum of Care (LA BOSCOCC) Responsibilities

The Louisiana Balance of State Continuum of Care (LA BOSCOCC) serves as the lead HMIS governance body, providing oversight, project direction, policy setting, and guidance for the HMIS. The LA BOSCOCC exercises all its responsibilities for HMIS governance through its Board and membership, with guidance from the HMIS Committee

The Louisiana Balance of State Continuum of Care (LA BOSCOCC) operates a Homeless Management Information System (HMIS) to record and store client-level information with regard to numbers, characteristics and needs of persons who use shelter, housing and supportive services who are experiencing homelessness within the geography which constitutes LA BOSCOCC.

The LA BOSCOCC is responsible for:

- a) Designating a single information system as the official HMIS software for the geographic area
- b) Designating an HMIS Lead to administer the HMIS
- c) Ensuring and monitoring compliance with relevant HUD regulations and standards
- d) Recording in official meeting minutes all approvals, resolutions, and other key decisions of the LA BOSCOCC that may be required by HUD rules related to the HMIS governing body
- e) Decision-making authority on HMIS user participation fees, if any are implemented, to be charged by the HMIS Lead
- f) Working with the HMIS Lead and LSNDCC to read and interpret any and all regulations, notices and other communications issued by HUD
- g) Reviewing and approving all HMIS operational agreements, policies, and procedures annually and as necessary revise and adopt HMIS use policies, procedures and plans
- h) Reviewing data quality standards and plans, and establishing protocols for addressing Partner Agency (CHOs') compliance with those standards;
- i) Promoting the effective use of HMIS data, including measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs;
- j) Using HMIS data to inform LA BOSCOCC program and system design, and measuring progress toward implementation of the LA BOSCOCC Strategic Plan and other LA BOSCOCC-established goals
- k) Working with LSNDCC Board and participating in the statewide HMIS, which is operated by [LSNDCC](#)
- l) Provide support to the HMIS Lead when requested to perform its duties, including but not limited to Partner Agency mediation, [fee](#) collection and imposing penalties

in operation since FY 18 that are not able to use HOMES and therefore are required to participate in HMIS for data collection purposes.



- m) Gathering data from the HMIS Lead and non-HMIS Partner agencies to use in reporting for the Point-in-Time (PIT) count.
- n) Compiling and submitting all local information as necessary for compilation of the annual Housing Inventory Count (HIC), the HMIS elements of the annual Point-in-Time (PIT) Count, Longitudinal System Analysis Report (LSA), and the System Performance Report and other HUD reporting as required Collaborate with the HMIS Lead to share information, develop goals, improve data quality, and assist Partner Agencies
- o) Coordinating participation in the HMIS (and broader Continuum of Care) by all homeless prevention and assistance programs and other mainstream programs serving people experiencing homelessness or working to prevent homelessness
- p) Monitor HMIS Lead to ensure responsibilities outlined in this Policies and Procedures and the CoC-HMIS Lead Agreement, the HMIS grant agreement and HUD-issued regulations and notices are fulfilled

4.4.2 LA BOSCOG HMIS Committee Responsibilities

The LA BOSCOG Homeless Management Information System (HMIS) Committee oversees and guides the development and management of the LA BOSCOG HMIS. The LA BOSCOG HMIS Committee is comprised of representatives from the Continuum of Care, HMIS Lead, and the HMIS System Administrator. Through the direction of these dedicated Steering Committee members, the HMIS Policies and Procedures reflect the CoC's HMIS operation. The Louisiana Housing Corporation (LHC) is the HMIS Lead for the LA BOSCOG HMIS and convenes the HMIS Committee.

The HMIS Committee has recommendation authority in the following areas:

- a) Review and revision of the LA BOSCOG HMIS Policies and Procedures including privacy, security and data quality plans
- b) Selecting the data elements to be collected by all program Partners in the HMIS project in addition to HUD Data Standard minimum requirements
- c) System access requests from non-mandated agencies
- d) Defining criteria, standards, and parameters for the release of aggregate data
- e) Evaluating the software vendor
- f) Evaluating the HMIS Lead
- g) Determining the guiding principles that should underlie the implementation activities of the HMIS, including Partner organizations, consumer involvement and service programs
- h) Reviewing and analysis of CoC system wide reporting including but not limited to the LSA and HUD System Performance Measures

4.4.3 HMIS Lead Responsibilities

The HMIS Lead will administer the HMIS software system for all users and will supervise system administration functions on agency and statewide levels.

HMIS Lead staff will work cooperatively with Continuum of Care staff and consultants.

HMIS Lead responsibilities include:

- 1) Governance and Reporting



- a) Providing staffing for operation of the HMIS;
 - b) Preparing at least annually data reports and analyses required by HUD and Federal Partners for review by the LA BOSCOG and for submission such as PIT, HIC, LSA, System Performance, etc.
 - c) Ensuring the consistent contribution of data that meets all HUD-established technical data standards to the HMIS database by, at minimum, every program operating with funds authorized by the McKinney-Vento Act as amended by the HEARTH Act, including ESG funds;
 - d) Working with the LA BOSCOG to facilitate participation by all homeless prevention and assistance programs and other mainstream programs serving people experiencing homelessness to participate in the HMIS;
 - e) Working with the LA BOSCOG to assist VSPs with implementation of their [comparable databases](#)
 - f) Attending LA BOSCOG and HMIS Committee meetings and contributing to CoC policy and planning decisions, including providing reports on data quality and performance at the system-, agency-, and project-levels
 - g) Working with LSNDG Board and participating in the LSNDG operated statewide HMIS, including assessing the performance of the HMIS Lead [LSNDG](#) appointee
 - h) Responding to LA BOSCOG and HMIS Committee authorized directives;
 - i) Working collaboratively with the CoC to enhance the CoC's use of HMIS to support coordinated entry prioritization and by-name list functionalities and
 - j) Providing data needed to inform LA BOSCOG's progress toward achieving its Strategic Plan goals.
- 2) Planning and Policy Development
- a) Managing and maintaining mechanisms for soliciting, collecting and analyzing feedback from Users, CHO HMIS agency administrators, CoC project managers, CHO executive directors, and persons experiencing homelessness;
 - b) Developing and, upon adoption by the LA BOSCOG, implementing written policies and procedures for the operation of the HMIS, including requirements and standards for any Contributing CoC Project, and provide for the regular update of these procedures as required by changes to policy;
 - c) Developing and, upon adoption by the LA BOSCOG, implementing a [data quality](#) plan consistent with requirements established by HUD, and review and update this plan annually and upon update to HUD regulations, notice, or guidance;
 - d) Developing and, upon adoption by the LA BOSCOG, implementing a [security plan](#) consistent with requirements established by HUD, and review and update this plan annually and upon update to HUD regulations or guidance;
 - e) Developing and, upon adoption by the LA BOSCOG, implementing a [disaster recovery](#) plan consistent with requirements established by HUD, and review and update this plan annually according to the most current HUD regulations or guidance;
 - f) Developing and, upon adoption by the LA BOSCOG, implementing a [privacy policy](#);
 - g) Developing and, upon approval by the LA BOSCOG, executing [HMIS Agency Partner Agreements](#) with each Partner Agency (CHO),



- 3) Grant Administration
 - a) Preparing and submitting HMIS Project Applications and reports for CoC Program funding in HUD designated system;
 - b) Creating annual budgets, identifying and securing matching funds, and completing all grant contract administration duties required by the CoC Program
- 4) System Administration

Overseeing the day-to-day administration of the HMIS system including;

 - a) Monitoring system access across the CoC and license utilization at the agency and user levels to ensure appropriate access to the system, in accordance with a documented methodology for HMIS access as defined in HMIS Policies and Procedures.
 - b) Overseeing system administration with concentration on internal and external security protocols including updating System Administrator and HMIS Committee of changes in access to system
 - c) Monitoring access to the web-based application through automated queries and software application protocols
 - d) Responding to system needs on a schedule to be determined by the HMIS Lead and approved by the HMIS Committee
 - e) Coordinating implementation of software enhancements approved by the HMIS Committee
 - f) Managing communication with current software vendor, which includes training for CHOs and LHC staff, and licensing of HMIS server;
 - g) Ensuring HMIS software meets the minimum data and technical functionality requirements established by HUD in rule or notice;
 - h) Ensuring HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data and the maintenance of [privacy](#), [security](#), and confidentiality protections;
 - i) Overseeing and relating small- and large-scale changes to the HMIS database through coordination with software vendor, the HMIS Committee, and Partner Agency (CHO) HMIS agency administrators, if applicable;
 - j) Facilitating, on a as needed, a Partner Agency (CHO) "user group" to discuss implementation of policies and procedures and data entry procedures; and
 - k) Updating contact list of HMIS agency administrators and users for all CHOs in conjunction with annual Agency Partner Agreement updates.
- 5) [User Administration](#)
 - a) Providing or coordinating technical assistance and support including but not limited to: building and organizing training and technical assistance to Partner agencies on all HMIS policies and procedures related to authorizing access to the statewide information system, including agency setup and users, network and system functionality questions
 - b) Documenting technical issues experienced by providers
 - c) Developing and delivering a comprehensive [training](#) curriculum and protocol, including accompanying tools and resources



6) [Data Quality](#) and Compliance Monitoring

- a) Consistent with the [data quality plan](#), establishing data quality benchmarks for Contributing CoC Projects, Consistent with the data quality plan, providing quarterly reports on HMIS participation rates, data quality and other analyses to the LA BOSCOB Board and HMIS Committee; and
- b) Monitoring compliance by all CHOs with HMIS participation requirements, policies and procedures, [privacy](#) standards, [security](#) requirements, and [data quality](#) standards through an annual review per the process outlined in the Agency Partner Agreement and approved by the LA BOSCOB

4.4.4 Partner Agencies Responsibilities (Contributing Homeless Organization CHOs)

Each Partner Agency will be responsible for oversight of all agency staff that generate or have access to client-level data stored in the system software to ensure adherence to the HMIS policies and procedures, including the CoC HMIS policies and procedures, HMIS data standards as established by HUD and other federal partners, privacy and security standards, data quality standards and expectations, and any other HMIS expectations established by the COC membership. All HMIS Participation must meet the minimum standards in the HUD No. FR-4848-N-02 Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice, and all State and Federal regulations as well as to ensure adherence to the HMIS principles, policies and procedures outlined in this document. Compliance includes but is not limited to the following:

The Partner Agency responsibilities include:

- Holding final responsibility for the adherence of the agency's personnel to the LA BOSCOB HMIS Policy and Procedures.
- Ensuring adherence to the Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice and all State and Federal regulations as well as ensuring adherence to the HMIS principles, policies and procedures outlined in this document
- Managing all activity associated with agency staff access and use of the HMIS data system
- Establishing and monitoring agency procedures that meet the criteria for access to the HMIS System, as detailed in the policies and procedures outlined in this document
- Putting in place policies and procedures to prevent any misuse of the software system by designated staff
- Agreeing to allow access to the HMIS System only to staff who have completed initial training in the HMIS system and who have a legitimate need for access. Need exists only for those staff, volunteers, or designated personnel who work directly with (or who supervise staff who work directly with) clients, or have data entry or technical responsibilities
- Obtaining the broadband internet connection to ensure adequate internet access
 - To avoid staff frustration and to be efficient, obtaining and maintaining an Internet connection greater than 56K/v90 is optimal. Suggestions include DSL (Digital Subscriber Line), Cable Access, or Satellite Downlink. HMIS staff can assist Partner agencies to identify local internet providers.



The Partner Agency also oversees the implementation of data security policies and standards and will:

- Assume responsibility for integrity and protection of client-level data entered into the HMIS system
- Ensure organizational adherence to the HMIS Policies and Procedures
- Communicate control and protection requirements to agency custodians and users
- Authorize data access to agency staff and assign responsibility for custody of the data
- Monitor compliance and periodically review control decisions
- Ensure that data is collected in a way that respects the dignity of the participants
- Ensure that all data collected must be relevant to the purpose for which it is used, that the data is entered accurately and on time
- Provide prompt and timely communications of data, changes in license assignments, and user accounts and software to the HMIS Systems Administrator and/or the HMIS Lead.
- Notify the HMIS Lead of any issue relating to system security or client confidentiality.

4.4.5 User Responsibilities (Staff Member)

All individuals at the HMIS Lead, system administration staff and at the Partner Agency levels who require legitimate access to the software system will be granted such access after training and agency authorization. Individuals with specific authorization will be provided user roles allowing access to the system administration for the purpose of conducting data management tasks associated with their area of responsibility.

Reasons for Access:

- The HMIS Lead agrees to authorize use of the HMIS only to users who have received appropriate training, and who need access to the system for technical administration of the system, report writing, data analysis and report generation, back-up administration or other essential activity associated with carrying out HMIS responsibilities.
- The Partner Agency agrees to authorize use of the HMIS only to users who need access to the system for data entry, editing of client records, viewing of client records, report writing, administration or other essential activity associated with carrying out Partner Agency responsibilities.

Users are any persons who use the HMIS software for data processing services.

Users are responsible for:

- a) Being aware of the data's sensitivity and respond appropriately to prevent unauthorized disclosure
- b) Protecting institutional information to which they have access and for reporting security violations Users must
- c) Complying with the [data security](#) as detailed in the LA BOSCOG HMIS Policies and Procedures herein and standards as described and stated by the Agency and HUD baseline requirements



- d) Being accountable for their actions and for any actions undertaken with their usernames and passwords.
- e) Advising the Agency and the HMIS Lead if passwords are suspected to be compromised.

Contractors, volunteers, interns and others who function as staff, whether paid or not, are bound by the same User responsibilities and rules set forth in this manual.



5 Privacy Plan Implementation

The HMIS Lead Agency, Partner Agencies, and Users are jointly responsible for complying with LSNDL Privacy standards and Privacy Plan and the LA BOSCOG HMIS privacy policies and procedures herein. When a privacy standard conflicts with other federal, state, and local laws to which the Partner Agency must adhere, the Partner Agency must contact the Lead Agency to collaboratively update the applicable policies for the Partner Agency to accurately reflect the additional protections.

The privacy guidance including in this manual complies with the LSNDL Privacy Policies and Procedures and the LSNDL privacy plan.

The LSNDL Privacy Plan and local LA BOSCOG HMIS Privacy Plan is reviewed at least annually by the HMIS Committee and revision recommendations are submitted to the LSNDL Governing Board and the HMIS Lead for review. The COG Membership has final approval authority of the LA BOSCOG Privacy Plan.

5.1 Use and Disclosure of Participant Information

Participant Personal Information may be collected and captured in the HMIS for the following purposes:

- To provide or coordinate services for clients
- To find programs that may provide additional client assistance
- To comply with government and grant reporting obligations
- To assess the state of homelessness in the community, and to assess the condition and availability of affordable housing to better target services and resources
- To collect other household data including included other household members as required by the Federal data standards

Only lawful and fair means are used to collect personal information. Personal information is collected with the knowledge and consent of clients. While some information may be required by projects or public or private funders to determine eligibility for housing or services, or to assess needed services.

Partner Agencies are obligated to limit disclosures of PPI to the minimum necessary to accomplish the purpose of the disclosure. Uses and disclosures of PPI not described above may only be made with a client's written consent. Clients have the right to revoke consent at any time by submitting a request in writing.

Participants have a right to refuse to provide information beyond what is required to determine eligibility. Participants should not be denied services if they are exercising that right. Individual organizations may have their own policies around data collection that may be stricter than HMIS policies.



5.2 Data Privacy Notice Requirements

5.2.1 Posting

The LSNDP Public Notice of Privacy must be posted and viewable by clients at each intake desk or comparable location to provide information on their rights and HMIS policies related to personal data. The Data Privacy Notice provides a brief overview of data privacy.

[Data Public Privacy Notice](#)

5.2.2 HMIS Data Privacy Notice Review

The LSNDP HMIS Data Privacy Notice must be available to all participants at intake at request which provide information on their rights and HMIS policies related to personal data. The Data Privacy Notice provides more detailed information about why HMIS data is collected, uses and disclosures, privacy protections, and client rights.

[LSNDP HMIS Privacy Notice](#)

5.3 Participant Release of Information

Statewide Data Sharing is a process guided by the client through the Release of Information (ROI). It is therefore imperative that the client understand the ROI, and that the Partner Agency address any questions the client may have, while respecting the client's right to decline to share data. Prior to designating any information for sharing with other Agencies, the Partner Agency will obtain the informed consent of the Client, using LSNDP's HMIS Release of Information. If a client does not consent pursuant to the HMIS Release of Information form, information may be entered into the HMIS, but may not be shared with other Partner Agencies. It is the responsibility of the Partner Agency entering information about a client to determine whether consent has been obtained; to make appropriate entries to either designate the information as appropriate for sharing or prohibit information sharing; and to implement any restrictions on information sharing. Use of the LSNDP Release of Information (ROI) is optional for each partner CoC. The HMIS Committee should review use of the LSNDP ROI at least annually and continued usage, or recommend discontinuation of the form to the LA BOSCOB Board. The LA BOSCOB has the authority to discontinue use of the LSNDP ROI.

[LSNDP Release for Confidential Information](#)

5.4 Roles and Responsibilities for Privacy

5.4.1 HMIS Lead Privacy Responsibilities

The Privacy Plan and the Privacy Notice provide guidance on the minimum standards which the HMIS Lead must follow when configuring the system, train users and monitor for compliance.

At a minimum, the HMIS Lead must meet the following standards:

- a) Training - The HMIS Lead is responsible for developing, conducting, and documenting Privacy trainings for all HMIS users and data collectors. Trainings should be provided at the new user access training and at least annually.



- b) System Configuration – The HMIS Lead must ensure that the HMIS software is configured correctly to ensure compliance with the LSND, CoC and Partner Agency established privacy policies and procedures.
- c) Monitoring – The HMIS Lead is responsible for developing, conducting, and documenting monitoring of compliance to established policies, procedures, and plans and report deviations from privacy protocol according to an established channel of communication. Monitoring will occur at least annually for each Partner Agency.

5.4.2 Partner Agency Privacy Responsibilities

The Privacy Plan and the Privacy Notice provide guidance on the minimum standards by which agencies must operate if they wish to participate in the HMIS. Meeting the minimum standards in this Privacy Plan and the Privacy Notice are required for participation in the HMIS. Any agency may exceed the minimum standards described and are encouraged to do so. Agencies must have an adopted Privacy Statement which meets the minimum standards before data entry into the HMIS can occur.

At a minimum, the Partner Agency must meet the following standards:

- a) The Partner Agency will use the LSND HMIS Release of Information form (ROI), for all clients when written consent is required. The LA BOSCO Board has the discretion to discontinue use of the ROI for the LA BOSCO HMIS.
- b) If the Partner Agency does not share data with other Agencies, the ROI form is not required. However, the Partner Agency will display the [Data Public Privacy Notice](#) and make available the [LSND HMIS Privacy Notice](#) for review by all clients and provide clients with copies as requested. If questions arise (for example, questions about which programs within the Partner Agency share data with other agencies), the Partner Agency will contact the HMIS Lead Agency.
- c) The Partner Agency will note any limitations or restrictions on information sharing on a client's ROI with appropriate data entries into the HMIS. If questions arise (for example, questions about how to implement restrictions on information sharing), the Partner Agency will contact the HMIS Lead Agency.
- d) The Partner Agency will be responsible for ensuring that consent is knowing, informed, and given by a person competent to provide consent. For example, in the case of a minor, the Partner Agency will comply with applicable laws regarding minor consent by obtaining the consent of a parent or guardian. In cases of adults subject to guardianship or conservatorship, the Partner Agency must obtain consent from a person authorized to consent under Louisiana law.
- e) The Partner Agency will not seek consent from any individual identifying as a minor, and the information gathered concerning unaccompanied minors will not be shared for any reason.
- f) If a client withdraws or revokes consent for release of information, the Partner Agency is responsible for immediately contacting the Lead Agency to ensure that client's information will not be shared with other Agencies from that date forward.

The Partner Agency that received the client's initial ROI form is strongly encouraged to scan and upload the signed copy of the form to the HMIS if resources and capacity exist to do so. Partner Agencies may



be required to keep the original copy for a period of seven years, as dictated by Partner Agency policy or funder requirements. ROI forms will be available for inspection and copying by the Lead Agency at any time.

5.4.3 User Privacy Responsibilities

A client's privacy is upheld only to the extent that the users and direct service providers protect and maintain client's privacy. The role and responsibilities of the user cannot be over-emphasized. A user is defined as a person that has direct interaction with a client or their data. (This could potentially be any person at the agency: staff member, volunteer, contractor, etc.)

At a minimum, users have the responsibility to:

- a) Understand the LSNDC Privacy Notice
- b) Be able to explain the LSNDC Privacy Notice to participants
- c) Follow their agency's Privacy Statement as applicable.
- d) Know where to refer the client if they cannot answer the client's questions
- e) Complete a LSNDC Release of Information with each adult head of household and other adult client prior to sharing HMIS data.
- f) Present the Data Public Privacy Notice (posted on the wall) to the client before collecting any information
- g) Comply with other privacy requirements in this Policies and Procedures and the LSNDC Privacy Plan.
- h) All individuals with access to PPI are required to complete formal training in privacy requirements at least annually.

5.5 Client Rights: Inspection and Correction of Personal Information

Clients may inspect and receive a copy of their personal information maintained in the HMIS. The agency where the client receives services will offer to explain any information that a client may not understand. The HMIS Lead Agency and Partner Agencies will work together to both fulfill the request and to help interpret the information it contains. Clients may start this request through a Partner Agency or directly with the HMIS Lead.

If the information listed in the HMIS is considered inaccurate or incomplete, a client may submit a verbal or written request to have their information corrected. Inaccurate or incomplete data may be deleted or marked as inaccurate or incomplete and supplemented with additional information. The client is not entitled to identifying information about user(s) who interacted with their record.

A request to inspect or copy one's personal information may be denied if:

- The information was compiled in reasonable anticipation of litigation or comparable proceedings;
- The information was obtained under a promise of confidentiality and if the disclosure would reveal the source of the information; or
- The life or physical safety of any individual would be reasonably endangered by disclosure of the personal information.



If a client's request to view or correct their personal information is denied, the Agency or HMIS Lead the client initiated the request will explain the reason for the denial. The client's request and the reason for the denial will be included in the client's record, by way of uploading documentation to the Attachments section within the client's HMIS record. Client requests to view or correct their personal information may be denied if they are made in a repeated and/or harassing manner. The Partner Agency and HMIS Lead Agency will ensure that any requests for inspection and correction of personal information will be responded to within 30 business days or a clear, alternate timeline for filling the request will be communicated to the client in writing.

6 Security Plan Implementation

The HMIS Lead Agency, Partner Agencies and Users are jointly responsible for complying with LSNDL Security Standards and Security Plan and the LA BOSCOG HMIS Security policies and procedures herein. When a security standard conflicts with other federal, state, and local laws to which the Partner Agency must adhere, the Partner Agency must contact the Lead Agency to collaboratively update the applicable policies for the Partner Agency to accurately reflect the additional protections.

The security guidance including in this manual complies with the LSNDL Privacy Policies and Procedures and the LSNDL security plan.

The LSNDL Security Plan and the LA BOSCOG HMIS Security policies and procedures is reviewed at least annually by the HMIS Committee and revision recommendations are submitted to the LSNDL Governing Board and the HMIS Lead for review. The COG Membership has final approval authority of the LA BOSCOG Security Plan.

6.1 Roles and Responsibilities for Security

6.1.1 Notification requirements within 24 hours

See the following notification requirements for in change of user or security incidents.

Partner Agency

Users

6.1.2 HMIS Lead Security Responsibilities

The Privacy Plan and the Privacy Notice provide guidance on the minimum standards which the HMIS Lead must follow when configuring the system, train users and monitor for compliance.

At a minimum, the HMIS Lead must meet the following standards:

- a) *Monitoring* The HMIS Lead is responsible for developing, conducting, and documenting monitoring of compliance to established policies, procedures, and plans and report deviations from the security protocol including monitoring audit logs for unauthorized access to client records and report deviations from security protocol according to an established channel of communication. Monitoring of Partner agencies will occur at least annually.



- b) *Security* The HMIS Lead will ensure each Partner Agency has an assigned security officer documented who will serve as the primary contact for security communication.
- c) *System Configuration* The HMIS Lead must ensure that the HMIS software is configured correctly to ensure compliance with the LSND, CoC and Partner Agency established security policies and procedures.
- d) *Training* The HMIS Lead is responsible for developing, conducting, and documenting Security trainings for all HMIS users and data collectors. Trainings should be provided at the new user access training and at least annually.

6.1.3 Partner Agency Security Responsibilities

To protect the confidentiality of the data and to ensure its integrity at the site whether during data entry, storage and review or any other processing function, at a minimum, a Partner Agency must develop rules, protocols or procedures to include addressing each of the following:

- a) Identification of staff to serve as security officer and notifying HMIS Lead of staff assignment and any changes;
- b) Requesting and determining user access roles;
- c) Process to secure unattended workstations;
- d) Assigning physical access to workstations;
- e) Implementation of hardware and/or software firewall to secure local systems/networks from malicious intrusion;
- f) Use of Antivirus and Anti-spyware software, including the automated scanning of files as they are accessed by users on the system where the HMIS application is housed as well as assuring that all client systems regularly update virus definitions from the software vendor;
- g) Updated computer operating systems regularly when provided by the software vendor;
- h) Standards for password complexity, expiration, and confidentiality;
- i) Policy on users including not sharing accounts;
- j) Maintaining a natural disaster plan to include electronic equipment and hard copies of participant information;
- k) Client record use and disclosure;
- l) Report requests and disclosure procedures; and
- m) Notice to the HMIS Systems Administrator of all discontinued computers using HMIS to ensure certificates, hard drives and access URLs can be properly disposed.

6.1.3.1 Hard Copies of Client-Level HMIS Data

Any HMIS data entry forms, reports, or other hard copies that include personally identifiable (client-level) information for or from the HMIS are subject to data security measures. Partner Agency staff must always supervise such hard copies when in a public area and keep hard copies in a secure file when staff are not present. Hard copies must be destroyed when no longer needed, unless doing so is prohibited by agency record retention policies.



6.1.3.2 Data Retention

Protected Personal Information (PPI) that is not in current use seven years after the PPI was created or last changed should be properly disposed unless a statutory, regulatory, contractual, or other requirement mandates longer retention. Care must be taken to assure that the guidelines associated with [Data Disposal](#) are properly followed.

6.1.3.3 Maintenance of Computers

The Partner Agency will be responsible for the maintenance and disposal of on-site computer equipment and data used for participation in the HMIS including the following:

Computer Equipment

The Partner Agency is responsible for maintenance of on-site computer equipment. This includes purchase of and upgrades to all existing and new computer equipment for utilization in the HMIS Project.

Data Storage

The Partner Agency agrees to only download and store personal identifiable client level data in an encrypted format, using industry standard access controls to secure the data. This may include the use of operating system security such as data encryption in conjunction with the implementation of system policies to enforce individual user profiles and user authentication.

Internet Connection

The Partner Agency is responsible for troubleshooting problems with internet connections.

6.1.3.4 Data Disposal

The Partner Agency agrees to dispose of documents that contain identifiable client level data in a manner that will protect client confidentiality.

- **Computer:** All technology equipment (including computers, printers, copiers and fax machines) used to access HMIS and which will no longer be used to access HMIS will have their hard drives reformatted multiple times (DoD specifications). If the device is now non-functional, it must have the hard drive pulled, destroyed, and disposed of in a secure fashion.
- **Hardcopies:** For paper records, shredding, burning, pulping, or pulverizing the records so that PPI is rendered essentially unreadable, indecipherable, and otherwise cannot be reconstructed.
- **Mobile Devices:** Use software tools that will thoroughly delete/wipe all information on the device and return it to the original factory state before discarding or reusing the device.

6.1.3.5 Disaster Mitigation

Electronic equipment including computers, networking hardware and handheld devices should be kept in a safe location to avoid damage or loss due to a natural disaster. Each Partner Agency should have a



natural disaster plan in place to include electronic equipment and hard copies of participant information.

6.1.3.6 Notification of User Departures Within 24 Hours

The Partner Agency must notify the HMIS Lead Agency of any users that are no longer employed by the Partner Agency or otherwise need their access removed within 24 hours of the user's departure.

6.1.3.7 Notification of Security Incidents Within 24 Hours

Partner Agencies must report all unlawful access of the HMIS and unlawful attempted access of the HMIS. This includes borrowing, loaning, sharing, or theft of usernames and passwords. Security incidents should be reported to the HMIS Lead Agency within 24 hours of their discovery. The HMIS Lead Agency will use the HMIS user audit report to determine the extent of the breach of security.

6.1.4 User Security Responsibilities

LA BOSCOG HMIS Users will implement physical and technical safeguards for all workstations that access electronic protected health information to restrict access to authorized users.

Specific measures include:

- a) Restricting physical access to workstations to only authorized personnel
- b) Securing workstations (screen lock or logout) prior to leaving area to prevent unauthorized access
- c) Enabling a password-protected screen saver with a short timeout period to ensure that workstations that were left unsecured will be protected
- d) Complying with all applicable password policies and procedures
- e) Ensuring workstations are used for authorized business purposes only
- f) Never installing unauthorized software on workstations
- g) Storing all sensitive information, including protected health information (PII) on network servers
- h) Securing laptops that contain sensitive information by using cable locks or locking laptops up in drawers or cabinets
- i) Ensuring workstations are updated regularly or left on but logged off in order to facilitate IT after-hours updates. Remember to exit running applications and close open documents
- j) Ensuring that all workstations use a surge protector (not just a power strip) or a UPS (battery backup)
- k) If wireless network access is used, ensure access is secure.

6.1.4.1 Notification of Security Incidents Within 24 Hours

Users must report all unlawful access of the HMIS and unlawful attempted access of the HMIS. This includes borrowing, loaning, sharing, or theft of usernames and passwords. Security incidents should be reported to the HMIS Lead Agency within 24 hours of their discovery. The HMIS Lead Agency will use the HMIS user audit report to determine the extent of the breach of security.

6.2 Violation of Security Procedures

All potential violations of these security protocols will be investigated by the HMIS Lead Agency and/or the HMIS Committee. Partner Agencies and users may be subject to sanctions as determined by the LA BOSCOG.



All confirmed security violations will be communicated in writing to the affected client by the Partner Agency within 14 days unless the client cannot be located. If the client cannot be located, a written description of the violation and efforts to locate the client will be prepared by the Lead Agency and placed in the client's file at the Agency that originated the client's record.

6.3 Disaster Recovery Plan

LSNDC's HMIS is covered under WellSky Community Services' Premium Disaster Recovery Plan. The HMIS Lead Agency is responsible for ensuring the LSNDC vendor contract contains a disaster recovery plan. Due to the nature of technology, unforeseen service outages may occur. Disaster recovery will be managed per the software vendor contract with WellSky and the HMIS Lead Agency will coordinate communication between affected parties in the event of a disaster.

7 Data Quality Plan Implementation

Data quality is a term that refers to the reliability and validity of client-level data collected in the HMIS. It is measured by the extent to which the client data in the system reflects actual information in the real world. To present accurate and consistent information and outcome measures on homelessness, it is critical that the HMIS have the best possible representation of reality as it relates to persons experiencing homelessness and the projects that serve them.

Specifically, the goal is to record the most accurate, complete, consistent, and timely information in order to draw reasonable conclusions about the extent of homelessness, service gaps, and their impact on the homeless service system.

Minimum Data Collection Standards

All Partner Agencies are responsible for asking all clients a minimum set of questions, or data elements.

These required data elements include:

- The Universal Data Elements required federally by HUD and at the state level by the LSNDC; and
- Program-Specific Data elements, which depend on the funder and may not be required at all if a program is not funded by a program that requires the use of the HMIS. The minimum expectations for data entry for all programs entering data in the HMIS is the focus of the Data Quality Plan.

Partner Agency projects are configured by the HMIS Lead to collect the required data elements based on information provided by the Partner Agency and the HMIS Lead. The Partner Agency staff will consult with the HMIS Lead in attempts to ensure proper setup, but responsibility for complying with funder requirements lies with the Partner Agency.

Agencies may collect additional information beyond the minimum required data elements, as long as the collection of these questions does not interfere with the minimum required data elements.



Agencies may create "Anonymous" records in HMIS. However, as noted in the LSNDP Privacy Plan in the appendix, clients may still refuse to answer questions. In addition, the partner agency has the capacity to create a participant record that is not shared per the participant's request.

To ensure high-quality data, the HMIS Lead, HMIS Committee, Partner Agencies, and users will regularly and collectively assess and address the quality of data by examining its accuracy, completeness, consistency, and the timeliness of its entry.

The Data Quality guidance including in this manual complies with the [LSNDP Data Quality Policies and Procedures](#) including the [LSNDP Data Quality plan](#).

The LSNDP Data Quality Plan and the LA BOSCOG HMIS Procedures and Plan are reviewed at least annually by the HMIS Committee and revision recommendations submitted to the LSNDP Governing Board and the HMIS Lead for review. The COG Membership has final approval authority of the LA BOSCOG Data Quality Plan.

7.1 Data Quality Plan

A continuous data quality improvement process facilitates the ability of the CoC to achieve statistically valid and reliable data. It sets expectations for both the community and users for capturing reliable and valid data on persons accessing agency programs and services.

The Data Quality Plan contains an overview of the improvement process, data quality standards, guidance on minimizing data quality issues, and the data use schedule with reporting timelines.

7.2 Components of Data Quality

7.2.1 Timeliness, Completeness, Accuracy, Consistency

Timeliness

Entering data in a timely manner can reduce human error that occurs when too much time has elapsed between the data collection (or service transaction) and the data entry. The individual doing the data entry may be relying on handwritten notes or their own recall of a case management session, a service transaction, or a program exit date; therefore, the sooner the data is entered, the better chance the data will be correct. Timely data entry also ensures that the data is accessible when it is needed, either proactively (e.g., monitoring purposes, increasing awareness, meeting funded requirements), or reactively (e.g., responding to requests for information, responding to inaccurate information).

The LA BOSCOG establishes its timeliness benchmarks based on project type including but not limited to Street Outreach, Emergency Shelter, Transitional Housing, Rapid Rehousing, Permanent Supportive Housing and Homeless Prevention. The current timeliness benchmarks for the LA BOSCOG HMIS are located in Section 1.1 of the [LSNDP Data Quality Plan](#) and the [LSNDP Timeliness Standards Update Applied to Project Types³](#) in the appendix.

³ As of June 2023 this document is under review and not in effective
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Completeness

The purpose of data completeness requirements is to ensure that our continuum has the ability to produce accurate unduplicated counts of people served and to fully understand the demographic characteristics and service patterns of clients accessing homeless and prevention services.

Partially complete or missing data (e.g., missing digit(s) in a birthdate, missing information on disability or veteran status, missing Relationship to Head of Household) can negatively affect the ability to provide comprehensive care to clients. Missing data could mean the client does not receive needed services – services that could help them become permanently housed and end their episode of homelessness.

The LA BOSCOG completeness benchmark is standard across all project types including but not limited to Street Outreach, Emergency Shelter, Transitional Housing, Rapid Rehousing, Permanent Supportive Housing and Homeless Prevention. The current completeness benchmarks for the LA BOSCOG HMIS are located in Section 1.2 of the [LSNDC Data Quality Plan](#) in the appendix.

Completeness: Coverage

It is a HUD expectation that all clients receiving homeless assistance will have their service delivery documented in the HMIS. If a program only enters data on a few of their clients, it is difficult to determine whether the data accurately reflects what is happening with all of the clients in the program.

Coverage is considered the degree to which all homeless assistance providers within a CoC's geography enter all homeless clients into HMIS. Providers include those funded by the CoC & ESG program, federal partner agencies, foundations, and private organizations.

Completeness: Bed Utilization Rate

One of the primary features of an HMIS is the ability to record the number of client stays or bed nights at a homeless residential facility. Case managers or shelter staff enter a client into the HMIS, assign them to a bed or unit, and the client remains there until they exit the program. When the client exits the program, they are also exited from the bed or unit in the HMIS. Bed Utilization is considered the degree to which the total number of homeless beds within the HMIS are recorded as occupied divided by the total number of homeless beds within the CoC's geographic coverage area.

Accuracy

The purpose of accuracy is to ensure that the data housed in the LA BOSCOG HMIS is the best possible representation of reality as it relates to homeless people and the projects that serve them. Accuracy is determined by assessing the truthfulness by the client, the accuracy of the data collected by staff, and the accuracy of the data entered into the system by the staff. Partner Agencies are responsible for making these assessments. In the HMIS, accuracy is assessed by verifying consistency across CoC activities including but not limited to: Notice of Funding Opportunity (NOFO), project monitoring and prioritization, local and federal reporting, system evaluation and modeling and other similar activities.



Accuracy is best determined by comparing records in the HMIS to paper records, or the records of another provider whose information may be considered more accurate. For instance, a Social Security Number that is in question may be compared to a paper case file or an SSI benefit application, where the data is perceived to be more accurate.

The LA BOSCOCC accuracy benchmark is standard across all project types including but not limited to Street Outreach, Emergency Shelter, Transitional Housing, Rapid Rehousing, Permanent Supportive Housing and Homeless Prevention. The current accuracy benchmarks for the LA BOSCOCC HMIS are located in Section 1.3 of the [LSNDC Data Quality Plan](#) in the appendix.

Consistency

To ensure that data is understood, collected, and entered consistently across all programs in the HMIS. Consistency directly affects the accuracy of data; if a user collects all of the data, but they don't collect it in a consistent manner, then the data may not be accurate.

7.3 Roles and Responsibilities for Data Quality

The responsibility for maintaining high data quality lies with all of the partners in the LA BOSCOCC, including the HMIS Lead, Partner Agencies, and HMIS Users.

7.3.1 HMIS Lead Data Quality Responsibilities

- Correctly set up sites and projects in HMIS
- Monitor and assess data quality across the CoC,
- Provide training and tools for understanding and achieving high data quality
- Work with the HMIS vendor on solutions for improving data quality, such as monitoring reports and validation

7.3.2 Partner Agency Data Quality Responsibilities

- Provide encouragement and guidance to staff to maintain high data quality
- Monitor data quality within the program, including running reports no less than quarterly
- Ensure compliance with the HMIS policies and procedures of the CoC
- Prepare for Annual Performance and/or CAPER reports by examining data quality within the report on a regular basis

7.3.3 HMIS User Data Quality Responsibilities

- Obtain complete answers to intake and assessment questions
- Accurately enter all data into HMIS within established timelines in the [LSNDC Timeliness Standards](#)
- Resolve any data quality issues quickly and accurately

7.4 Data Quality Monitoring

On a quarterly basis, the HMIS LEAD will review data quality reports by Partner project including:

- (1) the percentage of "client refused" values;



- (2) the percentage of “client doesn’t know” values; and
- (3) the percentage of “data not collected” values.

Agencies are expected to run and review their project reports independently, no less than quarterly and take action to ensure that their agency-level “Client Refused,” “Client Doesn’t Know,” and “Data Not Collected” values do not exceed 5%.

7.4.1 Compliance with Data Quality

Initial Engagement

As a result of regular data quality reviews that are aligned with the Data Quality Plan, if an agency is found to be out of data quality compliance:

- As part of regular operations, the HMIS lead will notify HMIS Partner Agencies of any data quality concerns and/or errors that need to be fixed
- If an agency continues to be out of compliance for one quarter, the HMIS Lead may begin to run monthly data quality reports. If at the second report show the agency continues to be out of compliance the HMIS Committee will review and work with HMIS Lead to take action
- At any time, technical assistance from the HMIS Lead or their designee will be available by phone or in person to resolve the data entry difficulties.
- Partner Agency staff is expected to acknowledge HMIS Lead and HMIS Committee communication and comply with deadlines.

Additional Compliance Engagement

If the agency continues to be out of compliance after three outreach attempts by the HMIS Committee, the Executive Director may be notified and the agency may be required to submit a written action plan to the HMIS Committee outlining corrective steps. The HMIS Committee will share the corrective action plan with the HMIS Lead. The HMIS Lead will report at least quarterly to the HMIS Committee on the status and progress of all corrective action plans.

Compliance Failure

Failure to correct actions and/or continuation of unresolved data quality issues may result in referral to the LA BOSCOB Board for review and adjudication. The non-compliant agency will be provided an opportunity to address the board prior to a final decision. The board has discretion to penalize the agency up to and including inactivation of user licenses and communication with HMIS mandated funding sources when applicable.

7.5 XML Imports

While HMIS databases are required to have the capacity to accept XML imports, the HMIS Lead Agency and the HMIS Committee reserve the right to review the potential XML imports into HMIS prior to the data import. XML imports will only occur once approval is granted. The HMIS Lead and the HMIS



Committee would consider an XML import impact on data quality and duplication of records in the system.

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8 Access

All Partner Agencies and users must agree to and abide by HMIS policies and procedures and related requirements. These requirements are described throughout this document, whereas this section focuses specifically on the process for new agencies, projects, and users joining the HMIS.

The HMIS Lead Agency will be the primary contact for all access to the system. The Lead is responsible for notifying system administrators and the HMIS Committee of newly joined Partner Agencies and any new projects (within new or existing Partner Agencies).

8.1 Partner Agency Requirements

Agencies must meet the following requirements to join the CoC's HMIS system as a partner agency. Details on each requirement are listed below.

- Allowable organizational status
- Confirmed organizational purpose within the LA BOSCO homeles response system
- Confirmed eligible use case requiring HMIS access

Organizational Status

In order to join HMIS as a Partner Agency, entities must hold current documentation indicating they are one of the following types of entities, where otherwise not excluded,

- Nonprofit organization
- State or local or tribal government
- Public or tribal housing agency
- Federal Departments

Private citizens are prohibited from joining HMIS as their own Partner Agency.

Other entities not explicitly named here seeking to join HMIS may be brought to HMIS Committee on a case-by-case basis.

Organizational Purpose within the Homeless Response System

Entities seeking to join HMIS as a Partner Agency must be able to confirm, upon request, that they are a part of the homeless response system in the LA BOSCO via at least one of the following:

- Indication that a funding source (as stated in [Partner Agencies](#) section above) requires HMIS participation and data entry.
- Indication from the LA BOSCO Coordinated Entry System (CES), via the Collaborative Applicant that the organization participates in the CES as an assessor, navigator, or other role formalized at the local level.
- Indication from the LA BOSCO governing body and/or another LA BOSCO leadership entity (such as the HMIS Committee, a lived experience leadership group, etc.) that the entity is an



active partner within the homeless response system, as interpreted locally, that articulates acceptable organizational purposes within the homeless response system.

Organizational Use Case within the HMIS

Entities seeking to join HMIS must present a use case that fits at least one of the established parameters as described below.

- Client-level data entry for programs - Organization has an operating program that serves people experiencing homelessness and/or precarious housing situations. It seeks to enter, at a minimum, the Universal Data Elements, for their clients in order to meet funding and/or reporting requirements.
- Coordinated Entry System (CES) data entry participation - Organization serves as an assessor, navigator, or other locally formalized role and must create and/or update client records, CES assessments and referrals to fulfill their role in the system

Use cases outside of these scenarios are welcome for consideration and will be carefully vetted by the HMIS Lead Agency in order to discern if it is technologically possible within current system constraints and/or in alignment with broadly held understandings and expectations around how the HMIS system is utilized statewide. The HMIS Lead Agency will refer the agency to the HMIS Committee for final approval. Additionally, the HMIS Lead Agency has discretion to bring newly proposed use cases to HMIS Committee for further discussion and feedback.

If an entity is approved to join as a Partner Agency but their use case would require a new workflow, their ability to begin utilizing HMIS may be subject to delays, pending HMIS Lead Agency resource constraints and existing project queues.

Agency-Level Documents

To obtain and maintain access to the HMIS, Partner Agencies must complete and adhere to the [Partner Agency Agreement](#) which underwrites the legal relationship between a Partner Agency and the HMIS Lead Agency as it relates to HMIS responsibilities and compliance with policies and procedures.

The Agency Agreement must be signed by the Partner Agency's executive director or equivalent as authorized by the organization. The HMIS Lead Agency will retain the original document.

In addition to the Agency Agreement, Partner Agencies may be required to complete additional agreements depending on the legal requirements that the Partner Agency is obliged to. It is the responsibility of the Partner Agency to determine whether any additional agreements are needed to comply with any laws or regulations that apply to the Partner Agency, such as [Health Insurance Portability and Accountability Act of 1996 \(HIPAA\)](#) or [Federal Drug and Alcohol Confidentiality Regulations \(42 CFR Part 2\)](#).



8.2 Review and Adjudication of Requests to Join HMIS

The HMIS Lead Agency reserves the right to request written, formal documentation of any of the above from the entity itself, the CoC, and/or the named funder(s). If documentation is incomplete and/or the organization's intentions within the homeless response system remain ambiguous and/or do not fit a clear use case for accessing HMIS, the HMIS Lead will bring the request to join HMIS to the HMIS Committee for review and determination.

If the HMIS committee determine that the organization may not join HMIS, the requesting entity may appeal to the COC Board. If the Board upholds the determination of the HMIS Committee, then the organization may seek to join again in one year, following the denial or if their circumstance changes to meet HMIS Partner Agency requirements.

In the wake of a denial to join HMIS, the HMIS committee will review the HMIS Policies to discern if any updates would help clarify determination of future similar use cases.

Additionally, the HMIS Lead may extend resources and recommendations to the denied organization to support them in building deeper partnerships within the homeless response system.

9 Training

One of the key responsibilities of a CoC's HMIS is a regular training plan for HMIS users that ensures all required HMIS users have received training and orientation on regulations pertaining to their funding, software data entry and capabilities, security, privacy, and HMIS policies and procedures of the CoC; and report generation.

The LA BOSCOG HMIS training plan currently utilizes the Capital Area Alliance for the Homeless HMIS support for training.

Available User trainings are based on funding source and project type including but not limited to:

- Coordinated Entry
- Street Outreach
- Shelter
- Rapid Rehousing
- Permanent Supportive Housing
- Transitional Housing
- VA Grant and Per Diem
- VA Supportive Services for Veteran Families
- Runaway Homeless Youth
- PATH

The regular trainings are typically scheduled each month and the latest schedule can be found in the CAAH support portal or by contacting the HMIS Lead.

To request HMIS training go to HMIS support portal located at:

<https://www.homelessinbr.org/request-support>.



9.1 New Users Training

New HMIS users are required to complete initial training to gain access to HMIS. If access to HMIS is not given or requirements are not being met, the HMIS Lead Agency or their sub-recipient will notify the partner agency management or their HMIS admins of any issues and remedies needed to move forward.

Prior to receiving access to the CoC's HMIS system Partner Agency new users must meet the following training requirements.

- Attend an Introduction to HMIS training session (*prior to project specific training sessions*)
- Complete the HMIS User Training Series and all required assignments with the HMIS Lead Agency within 20 business days of starting series

The User Training Series requires users to take program- and/or project-specific training related to the programs and projects administered by their agency.

HMIS Lead Agency staff or their sub-recipient will:

- Review the user's assignments and determine if corrections are needed
- Determine if a new user failed to grasp the necessary data entry concepts based on the quality of the user's assignments
- May refuse to issue the new user a LSNDG HMIS user license if they determine that the new user is not capable of accurate and complete data entry

Training Exception

If a user requesting a new user license had a license for the LSNDG HMIS in the past 180 days, the user will be given the option to test out of User Training through a demonstration of fundamental data entry knowledge. The HMIS Lead Agency or their sub-recipients have sole discretion to determine whether the user has successfully tested⁴ out of this requirement.

9.2 Ongoing Training

Annual Data Privacy & Security Recertification Training

In order to retain their user license, all users are required to attend annual training provided by the HMIS Lead Agency. This training covers data privacy, security, and confidentiality. Failure to complete the training on an annual basis may result in inactivation of the user's license.

9.3 Additional Recertification Training

At the discretion of the HMIS Lead Agency, users may be required to complete a recertification training in the event of significant changes to data collection requirements, data entry workflow, or HMIS policies and procedures. Users who do not complete recertification training in a timely fashion may have their licenses inactivated until training has been completed.

⁴ This will be developed after the approval of this document



9.4 Refresher Training

If the HMIS Lead Agency determines through regular data and metadata review any of the following has occurred:

- (a) data entered by a current user has not met minimum data quality standards;
- (b) the user has not accessed the system within three months after completing a User Training; or if
- (c) a user has not accessed the system within a period of at least 180 days,

then the user may be required to repeat the User Training prior to continued activation of the account.

9.5 Report Training

Report training is recommended for program managers, supervisors, and agency admins. Report training may include:

- running basic reports,
- basic data analysis,
- understanding usability, and
- an intro to data literacy and data quality management.

Report training is scheduled through the Capital Area Alliance for the Homeless HMIS [support portal](#) similar to user trainings.

Additional high level report training is available for advanced users and may include:

- train the trainer,
- advanced data analysis,
- Ad Hoc report creation, and
- other advanced reporting.

Advanced concepts may be reserved for program staff with elevated management, supervisory, or quality assurance responsibilities.

10 Monitoring

The CoC Program Interim Rule gives CoCs authority over HMIS and states that all CoCs must have an HMIS governance structure that details who is responsible for assuring and monitoring compliance of the local HMIS. This governance structure varies from CoC to CoC, but normally responsibility is given to the the CoC Board, data committee, or HMIS Lead. The LA BOSCOG governance provides authority to the CoC Board to procure, review and monitor both the HMIS Lead and the HMIS Vendor.

10.1 HMIS Lead Monitoring

The CoC Board will monitor and evaluate the HMIS Lead at least annually and report back to the CoC membership the concerns and findings of the monitoring. The CoC board has the authority to delegate monitoring responsibilities to a committee, ad hoc group or third party (identified in this document as the Monitoring Team). Monitoring will include a review of responsibilities for managing the HMIS for the CoC's geographic area in



accordance with the CoC Program interim rule ([24 CFR Part 578](#)) and any HMIS requirements prescribed by HUD which involve HMIS administration, performance management, and quality service delivery. Monitoring will include a review of responsibilities assigned to the HMIS Lead by the CoC through additional governance requirements, the CoC/HMIS Lead memoranda of understanding, or other binding documents such as contracts or statements of work.

10.1.1 HMIS Lead Monitoring Tool

The CoC board or its delegated authority will develop and update a standard HMIS Lead monitoring tool which will be reviewed by the HMIS committee at least annually. This tool should include a review of the HMIS policy and procedures compliance and other expectations identified in the HMIS Lead CoC agreement and CoC governance. In addition, the monitoring tool should include a review of the HMIS Annual Performance Report (APR) for accuracy and consistency between information provided to HUD and information used for baseline HMIS Lead monitoring requirements.

10.1.2 HMIS Lead Monitoring Process

The Monitoring Team will notify the HMIS Lead and all other parties deemed integral in the monitoring process at 30 days prior to the actual monitoring. The monitoring team will supply the HMIS Lead a list of documents to be reviewed and individuals to be interviewed.

The monitoring team should review implementation and effectiveness of compliance with: HMIS Lead requirements, HMIS governance, system administration, policy development and implementation. Additional monitoring should include compliance with HMIS software vendor monitoring, training, customer service, and user support services; data analysis and reporting, staff management and capacity, and strategic planning and HMIS growth.

The monitoring team's review of the HMIS Lead's Capacity to administer the HMIS may require a much higher level of effort, given the complexity of tasks for which the HMIS Lead is responsible for and the qualitative nature of system administration. The team must incorporate written documentation and agreements—such as memoranda of understanding, contracts, or statements of work—into the monitoring process to set objective and transparent baselines. The monitoring process must be precise—meaning detailed and specific—and accurate—meaning correct and unambiguous to all entities involved in the monitoring. Therefore, the monitoring team should utilize the monitoring tool, once developed, as the primary instrument during reviews of the HMIS Lead.

10.1.3 HMIS Lead Monitoring Results and Actions

The Monitoring Team will ensure there a deliberate, transparent, and objective process for reviewing the results of the monitoring. Given that HMIS administration, management, and operation is typically a shared responsibility across multiple groups of COC partners, the team should carefully review how the monitoring findings or results are impacted by each group. The team should also consider how clearly and accurately roles and responsibilities have been defined, communicated, and operationalized. HMIS roles and responsibilities should be defined and codified in the CoC's HMIS governance charter and this document, communicated through written agreements and training opportunities, and then operationalized and reinforced through monitoring, measurement, and evaluation processes. The Monitoring Team must review monitoring findings and the underlying cause of



compliance and performance results before investing resources in a plan of action to improve the HMIS implementation.

The Team will document and present the results of the monitoring to the CoC Board and Membership within 60 of the monitoring. Prior to this presentation of monitoring results, the HMIS Lead must be given at least 30 days to address any concerns or findings through immediate action or implementing a corrective plan.

Based on the findings, the monitoring team can make recommendations to the COC Board and membership concerning an action plan for addressing findings and concerns. The CoC Board may require the HMIS Lead to develop a HMIS Lead improvement plan which should include prioritizing activities, adopting best practices, local context, securing resources, and implementing and managing change.

In the rare situation that an HMIS lead does not respond to continuous monitoring and/or develop and follow the HMIS improvement plan, the COC will consider a change in HMIS lead management. This change can only be authorized by the COC membership and should be a last result when all other measures have proved ineffective. If the CoC membership agrees to a change in HMIS lead agency, the CoC Board will be authorized to procure another HMIS lead agency and a request to transfer the CoC HMIS grant will be submitted to the HUD Field Office.

10.2 HMIS Vendor Monitoring

The designated HMIS software solution for the LA BOSCO is Community Services® by WellSky of Overland Park, Kansas, and operated by the Louisiana Service Network Data Consortium (LSNDC). Currently, all HMIS Leads and Continuums of Care in the State of Louisiana use Community Services® and collaborate, participate, and contribute data into the statewide system. The Vendor and Software will be reviewed for HUD and contract compliance at least annually by the LA BOSCO HMIS Committee. Any changes in vendor and/or software must be approved by the CoC membership. Standard procurement procedures should be implemented when securing a new HMIS vendor.

11 Reporting

HMIS Reporting is a major driver of CoC decision-making. The HMIS serves the CoC as a tool for understanding gaps in services, understanding community needs and the degree to which they are being met, understanding, and addressing racial disparities, coordination between organizations, and coordination of services to clients in a housing crisis.

The HMIS system allows for different reporting options and reporting request based on the data being collected for each project and the continuum system of care. Currently, many of these reports are built-in reports and can be run from most user roles. These include the COC Annual Performance Report (APR), the Coordinated Entry APR, the ESG CAPER report, the HHS PATH report, and the SSVF Data Quality report. For training on how to run these built-in reports please reference the above [training request section](#).

11.1 Custom Report/Data Request (Current Contributing Agency or CoC Committee)

Current LA BOSCO Board, LA BOSCO Collaborative Applicant, CoC members, CoC committees, and funders should submit custom reporting request directly to the HMIS Lead for vetting and prioritization. Examples of custom reports can include:



- Basic client counts at the client, household, project, project type, CoC, and system levels
- Inventory-based reports, such as Bed/Unit Utilization
- Project-level reports for emergency shelter projects available in HMIS for either Project Start/Exit transactions or Night-by-Night transactions (as defined by the workflow)
- Audit report requests (for CoC Governance, Project Staff, and Clients)
- Reports to help with prioritization for Coordinated Entry
- Reports to help the CoC with ranking projects for CoC Competition
- Duplicate client reports
- Data quality metrics to help target assistance to projects struggling with HMIS
- Performance-based reports that disaggregate data by race, ethnicity, gender, age, disability, and intersections of these to better understand disparities and inequities in the homeless response system

Report and/or data request which are not currently available in the HMIS system, should be submitted to the HMIS Lead for acceptance and assignment. The HMIS Lead will review several factors of the request including to determine if the report can be completed as requested. These factors can include but are not limited to: feasibility of the report, man hours required to create a report, usability of the report for other agencies and projects, privacy concerns, and accuracy of data being requested. The HMIS System Administrator will also assess if a similar report can be revised or adjusted to meet the needs of the data request period

If the HMIS Lead determines the report request meets the minimum threshold standard, the HMIS Lead will notify the requestor of the approximate date of completion of the report. Otherwise, the HMIS Lead may refer the request to the HMIS Committee for threshold review and to determine if and when the report can be completed in the future. The HMIS lead will notify the data requester within 45 days concerning the outcome of the report request

When submitting a report request, the requester should include the following information in the request: name, organization, e-mail address, phone number, preferred deadline, audience, description of the request, reporting start and end date, and which data fields you will need information on.

All custom report requests must utilize the [support portal](#).

11.2 Custom Report/Data Request (Non-COC members)

Data request coming from outside of the continuum of care either for use in research studies, grant funding, and community planning should be made directly to the HMIS Lead for evaluation and approval. The HMIS lead may refer the request to the HMIS committee for additional discussion prior to a decision.



12 Communication

The LA BOSCOG HMIS Lead is responsible for relevant and timely communication with each Partner Agency, regarding all aspects of the LA BOSCOG HMIS, reporting and data standards. All users must provide contact information to receive HMIS communications.

Neither the LA BOSCOG HMIS Lead nor sub-recipients are responsible for a Partner Agency's loss of funds due to their negligence in adhering to any updated regulations regarding reporting and data collection. General system and training communications from the HMIS Lead and/or the sub-recipients will be directed to all users enrolled in LA BOSCOG HMIS User distribution list. General communications from LA BOSCOG HMIS Lead will be sent through e-mail communication or posted online. Specific communications will be addressed to the person or people involved by direct e-mail communication. For emergency situations, communications will be directed through direct e-mail and the Community Services® Agency News system located on the home screen of the LA BOSCOG HMIS.

All FAQs, tip sheets, documentation, policies, procedures, reporting matrix and general help will be located on the either the LA BOSCOG website, or the sub-recipient's website. Agency Administrators are responsible for distributing information received from the HMIS Lead to any additional users at their agency who may need to receive it, including, but not limited to, Executive Directors, Security Officers, and HMIS Users.

Additionally, information will be distributed during the HMIS committee meetings and during any HMIS user meetings as applicable

Questions regarding new users, the support portal, reports, HIMS policies and procedures and HMIS agreements should be submitted to the LA BOSCOG HMIS Lead by email. Requests to adapt or create a report within Community Services must be submitted through the HMIS support portal.

To receive the best customer service from the HMIS Lead, partner agencies are encouraged to utilize the [HMIS Portal](#).

The goal of the LA BOSCOG HMIS Lead and its sub-recipients is to respond to all needs within one (3) business days of initial contact.

[LA BOSCOG HMIS Support Portal \(Helpdesk\)](#)

The HMIS Support Portal is available 24 hours a day for requests to be submitted with an exception for technology updates and service interruptions. Help requests will be addressed in the order of receipt and preferably within 72 business hours. All requests received after 4:30 p.m. may be addressed the next business day. Support request in the portal can include but are not limited to: User training, requesting live support, requesting training reports, orientation/overview, project setup, data request, project status changes, reporting a problem, system maintenance, and user deactivation.

13 Agreements

The LA BOSCOG will ensure agreements between the various entities involved with HMIS exists to ensure the proper and beneficial operation of the LA BOSCOG HMIS implementation.



Executed agreements should be in place between the HMIS Lead and

- (1) the CoC
- (2) all Partner Agencies (Covered Homeless Organizations (CHOs)), and
- (3) users accessing your HMIS.

13.1 Agreement with the CoC

To ensure clear decision-making processes regarding the LA BOSCOG HMIS implementation, the HMIS Lead will execute a formal agreement with the CoC that clearly identifies, defines, and describes the roles and responsibilities of each organization or party to the agreement. This formal agreement acknowledges the separation of duties, and will act in part as a guide to the HMIS Lead's performance, and includes processes for termination.

The current HMIS Lead CoC agreement can be found in the Appendix (**) of this document.

HMIS Responsibilities from current governance document belong here until the agreement is drafted.

13.2 Agreement with Partner Agencies (CHOs)

The HMIS Lead will execute a written HMIS Participation Agreement with each Partner Agency (CHO). This HMIS Participation Agreements may cover a host of activities necessary to meet local needs, at a minimum, this executed agreements should address:

- a) The obligations and authority of the HMIS Lead and the Partner Agency (CHO)
- b) The requirements of the CoC's Privacy Policy and Security Plan with which the HMIS Lead and Partner Agencies (CHOs) must abide
- c) The sanctions for violating the HMIS Participation Agreement (e.g., imposing a financial penalty, requiring completion of standardized or specialized training, suspending, or revoking user licenses, suspending, or revoking system privileges, or pursuing criminal prosecution)
- d) An acknowledgment that the HMIS Lead and the Partner Agency (CHO) will process Personally Identifiable Information (PII) consistent with the Agreement
- e) An acknowledgement on how to ensure the Partner Agency's (CHO) staff have met the HMIS confidentiality agreement requirement

13.3 Agreement with Users

To ensure compliance of HMIS and Partner Agency (CHO) staff with HMIS Policies and Procedures, HMIS Partner Agency Agreements, and Privacy and Security Plans, the HMIS Lead will execute an HMIS User Agreement with every person with access to the HMIS and its data. Currently the LA BOSCOG utilizes the LSNDG HMIS Participation Agreement with each User who has or is requesting access to the system. This document includes the following:

- a) Expectations for ensuring data security
- b) Expectations for maintaining client privacy and confidentiality
- c) Expectations for adherence to all HMIS related policies and procedures, including privacy, security, coordinated entry, data quality, and data use and disclosure



- d) How users are meant to refresh their knowledge of the Privacy and Security Plans on a regular basis and be informed of any updates to the policies
- e) Responsibilities for reporting deviations from HMIS related policies and procedures Statement of potential disciplinary actions for deviations from HMIS related policies and procedures

13.4 Comparable Database Responsibilities

Victim Services Providers (VSPs) that are recipients or sub-recipients under the CoC and ESG Programs are required to collect client-level data consistent with HMIS data collection requirements. The Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that limit VSPs from sharing, disclosing, or revealing victims' Personal Identifiable Information, including entering information into shared databases like HMIS. To protect clients, VSPs must enter required client-level data into a comparable database that complies with all HMIS requirements. The LA BOSCOG HMIS Lead or its sub-recipient will assist VSPs with implementation of their comparable databases. The HMIS Lead will reach out to VSPs within the CoC on an annual basis to discuss the VSP's comparable database and HUD Data Standards compatibility.

14 Amending Policy and Procedure

The policy and procedures included in this manual may be amended but must be reviewed at least annually by the HMIS committee.

Any changes proposed to this manual made by the HMIS committee must be approved by the CoC Board.



15 Appendix

15.1 Definitions

Data Quality: A term that refers to the reliability and validity of client-level data in HMIS. It is measured by the extent to which data in the system reflects actual information in the real world. With good data quality, a Continuum of Care can accurately tell the story of the individuals and families it serves.

Louisiana Services Network Data Consortium (LSNDC): The entity that operates the LSNDC System Contracted System administrator.

Designated Agency HMIS Contact: The individual responsible for HMIS use at each partner agency.

Homeless Management Information System (HMIS): An internet-based database that is used by homeless service organizations across Minnesota to record and store client-level information to better understand the numbers, characteristics and needs of homeless persons and those at risk of homelessness.

HMIS Committee: The group of HMIS stakeholders who are responsible for reviewing and implementing the HMIS Policies and Procedures, and for funding, planning, and overseeing improvements to LA BOSCOIC's HMIS. Information on the committee's composition, responsibilities, and meeting times can be found on the HMIS Lead or contracted system administrator website.

HMIS Lead Agency: The HMIS Lead Agency is responsible for the technical design, implementation, and operation of the HMIS. In doing so, the Lead Agency provides Partner Agencies and users with training and technical support, ensures compliance with HMIS policies and procedures, and plans and jointly approves with the HMIS committee annual HMIS budget and work plan. LA BOSCOIC HMIS Lead Agency is the Louisiana Housing Corporation.

HMIS Vendor: The HMIS Vendor designs the HMIS software and provides ongoing support to the System Administrators. LA BOSCOIC's HMIS Vendor is WellSky Community Services.

Local System Administrators: Persons trained and approved by the HMIS Lead Agency who provide reporting or system administration support.

Partner Agency: Any agency, organization or group who has an LSNDC Agency Agreement with the Regional LSNDC System Administrator and that is allowed access to the LSNDC database (aka HMIS).

Program-Specific Data Elements: Questions that are designed, managed, and required by at least one of the HMIS federal or state partner programs. Federal Program-Specific Data Elements are subject to change every other year on October 1.

Universal Data Elements (UDEs): The minimum set of questions that all homeless programs in the HMIS, regardless of funding source, must complete for all clients served. Federal UDEs are outlined in the HMIS Data Dictionary and the HMIS Data Standards Manual, and are subject to change every other year on October 1.

User: An individual who used a particular software package; in the case of the LSNDC the Community Services software.



Workstations: include any areas or devices used to access HMIS or undertake work on HMIS (including spaces at home, office, and remote locations). Specific devices include but are not limited to laptops, tablets, phones, mobile devices, desktops, and computer based medical equipment.

Victim Service Provider: A nonprofit agency with a primary mission to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

15.2 HMIS System Documents

- 15.2.1 Partner Agency Agreement (CHO Agreement)
- 15.2.2 User Agreement
- 15.2.3 Privacy Notice
- 15.2.4 Public Privacy Notice
- 15.2.5 LSNDC Release of Information (ROI)
- 15.2.6 Client Grievance
- 15.2.7 LSNDC Policies and Procedures
- 15.2.8 LSNDC HMIS Security Plan
- 15.2.9 LSNDC HMIS Privacy Plan
- 15.2.10 LSNDC HMIS Data Quality Plan
- 15.2.11 LSNDC Timeliness Standards Update Applied to Project Types
- 15.2.12 HMIS Lead Agency Agreement



16 Approval

16.1 Approval Process Timeline

- August 17, 2023 -- reviewed during the LA BOSCOG HMIS Committee Meeting
- August 17, 2023 -- approved by the LA BOSCOG HMIS Committee Meeting
- October 3, 2023 -- reviewed during the LA BOSCOG Board Meeting
- October 3, 2023 -- approved by the LA BOSCOG Board

16.2 Signature

For this document to take effect, it must bear the signature of either the Board Chair or the Board Vice Chair.

This document is effective as of the date on its first page, not as of the date of this page's authorizing signature. This document's effective date cannot be earlier than the date of this page's authorizing signature.

By signing below, the signatory certifies that this document has been reviewed and approved for release according to the procedures of the LA BOSCOG HMIS Committee and the LA BOSCOG Board. If the signatory is the Board Vice Chair, the signatory also certifies that they have the authority to sign this document as granted by most recently approved version of the LA BOSCOG HMIS Policies and Procedures.



Winona Connor, Chair
LA BOSCOG Board



Date

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