

Rhode Island HMIS Policies and Procedures Handbook

**RHODE ISLAND HOMELESS MANAGEMENT INFORMATION SYSTEM
(RIHMIS)**

POLICIES AND PROCEDURES HANDBOOK



Version 2.3: Revisions, Additions, Deletions

The Rhode Island Homeless Management Information System (RIHMIS) is managed by the Rhode Island Coalition for the Homeless. For further information about the RIHMIS contact:

Rhode Island Coalition for the Homeless

160 Broad Street

Providence, RI 02903

Voice:(401) 421-6458

FAX: (401) 421-6426

www.rhomeless.com

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INTRODUCTION

These Policies and Procedures were developed to guide the operation of the Rhode Island Homeless Management Information System (RIHMIS). The RIHMIS is an additional tool to help assure that RI individuals and families who are homeless or at risk of becoming homeless have access to housing and supportive services that are appropriate to their housing, health and human service needs.

The Homeless Management Information System Steering Committee oversees and guides the development and management of the RIHMIS. This RIHMIS Steering Committee is comprised of two representatives from the Continuum of Care, RI Housing, RIHMIS staff, and consumers. Through the direction of these dedicated Steering Committee members, these Policies and Procedures reflect the community's stance on the operation of the RIHMIS. The Rhode Island Coalition for the Homeless is the administrating agency for the Rhode Island Homeless Management Information System and convenes the Steering Committee.

The RIHMIS Steering Committee has as guiding principles that the RIHMIS:

- Is an implementation which minimizes risk and maximizes benefits for homeless men women and children
- Is designed to respect and meet the needs of consumers
- Is a reliable, flexible and consistent technological system to benefit persons who are homeless or at risk of becoming homeless by providing data that:
 - a. Captures accurate local, regional, and statewide information about characteristics and service needs, and
 - b. Improves care and access to care by allowing for a fully integrated system of referrals and service delivery to people who are homeless
- Uses a data security approach to information management that balances:
 - a. confidentiality, so that only authorized people see the data;
 - b. integrity, so that data is not modified in any way; and
 - c. availability, so that data is accessible to those who use it when they need it.

An underlying philosophy that has driven the process is respect for the personal data of each individual. Clients must give informed consent to having their data entered into the system. They must also authorize the sharing of their data and specify with whom it may be shared. They may decide not to participate and they may not be denied services for lack of participation.

A goal of the RIHMIS is to inform public policy makers about the extent and nature of homelessness in the state of Rhode Island. This is accomplished through analysis of data that is grounded in the actual experiences of homeless persons and the service providers who assist them in shelters and homeless assistance programs throughout the state. Information that is gathered via interviews conducted by service providers with consumers is analyzed. The resulting statistics are used to develop an unduplicated count, aggregated (void of any identifying client level information) and made available to policy makers, service providers, advocates, and consumer representatives.

The RIHMIS utilizes web-based software that was selected after much thoughtful investigation.

Through this software homeless service organizations across RI are able to capture information about the clients they serve. RI COALITION FOR THE HOMELESS-RIHMIS staff provides technology, training and technical assistance to users of the system throughout the state of Rhode Island.

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POTENTIAL BENEFITS OF RIHMIS

For homeless men, women, and children:

- A decrease in duplicative intake and assessments
- Streamlined referrals
- More coordinated case management
- Improved benefit eligibility determination

For case managers:

- Use of web-based software to assess clients' needs and to inform clients about services offered on site or available through referral.
- Use of on-line resource information to learn about resources that help clients find and keep permanent housing or meet other goals clients have for themselves.
- Improve service coordination when information is shared among case management staff within one agency or with staff in other agencies (with written client consent) who are serving the same clients.

For agency and program managers:

- Improved ability to track client outcomes
- Improved coordination of services, internally among agency programs and externally with other service providers
- Improved data used for preparing reports to funding entities, boards and other stakeholders and advocacy for additional resources
- Aggregate information that can be used in program design and implementation through a more complete understanding of clients' needs and outcomes
- Capacity to automate the generation of numeric statistics for use in HUD APRs

For community-wide Continua of Care and policy makers and other advocates:

- Understanding of the extent and scope of homelessness
- Unduplicated count of clients
- Identification of service gaps
- Utilization of aggregated information for system design
- Development of a forum for addressing community-wide issues
- Enable McKinney-Vento funded organizations to meet the congressional mandate specified in the HUD Data and Technical Standards Final Notice.
- Access to aggregate reports that can assist in completion of the HUD-required gaps chart
- Utilization of the aggregate data to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

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HANDBOOK FORMAT

This handbook contains the most current information on the operation of the RIHMIS. It is expected that information will be added, removed and altered as necessary as the program evolves. For this reason the Handbook is in modular form so that outdated information may be easily removed and updated information added. For ease of use pagination is by Section and policy number. Policy numbers are 1-35 with Section numbers 1-5. Attachments start on page 48.

ACKNOWLEDGEMENTS

This RIHMIS Policy and Procedures Handbook was collaboratively written and advised by CT-HMIS Start-Up Committee member Crane Cesario. We thank the CT-HMIS Advisory Committee members Donna Blakey, Dave Shumway and Ken Teel for their keeping the project on task, writing and insightful suggestions. We thank the CCEH staff, Mary McAtee, Walter Hewitt, Carol Duffy and Tabitha Harkin for their vision, writing, technical assistance and suggestions, and we thank the CT-HMIS Steering Committee for their dedication to the project and ensuring that the Policies and Procedures meet the needs of the stakeholders. Stephanie Ross was the consultant for the development of this document. This document has been adapted for use in the Rhode Island Continuum of Care (CoC) with permission of the CT-HMIS. The final revision of the Rhode Island HMIS Policy and Procedures manual was by Don Larsen (11/30/2006). The Rhode Island CoC, RI Housing and Mortgage Finance Corp. and the RI Coalition for the Homeless would like to thank the above people for their hard work and generosity in letting us adapt this document for our use.

March, 2005

January, 2007

HUD HMIS DATA AND TECHNICAL STANDARDS FINAL NOTICE

HUD has issued the Homeless Management Information System (HMIS) Data and Technical Standards Final Notice. This Notice implements the data and technical standards for the HMIS, and describes baseline requirements for all facets of the HMIS. HUD has provided additional training to interested parties on these required baseline standards.

The privacy and security section in the Notice provides baseline standards required of all programs that record, use or process HMIS data. According to the Notice, these required baseline standards are based on principles of fair information practices and security standards recognized by the information privacy and technology communities as appropriate for securing and protecting personal information and rely on software applications that typically come with hardware purchased within recent years. The Notice further explains that HUD has issued these required baseline requirements and additional security protections that communities may choose to implement to further ensure the security of their HMIS data.

Several policies and procedures have been revised as a result of this Final Notice.

October, 2005

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SECTION 1:

CONTRACTUAL REQUIREMENTS AND ROLES



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POLICY 1: RIHMIS CONTRACT REQUIREMENTS

The Rhode Island Coalition for the Homeless is committed to coordinate and provide services to state funded emergency shelter programs and other HUD funded programs that are required to participate in a RIHMIS. Participating Agencies shall sign a Partnership Agreement and comply with the stated requirements.

RI Housing and the RI COALITION FOR THE HOMELESS will contract for and administer a contract for the following:

- Server based software license (Production and Training Systems)
- User licenses issued
- Training for Software Implementation
- Annual Support agreement
- AIRS (Alliance of Information and Referral [I&R] Systems)Taxonomy
- SSL (Secure Socket Layer-a commonly used form of encryption) Certificate (shows that the site is secure)
- Disaster Protection and Recovery Support
- 128 bit encryption
- Binary data storage (e.g., Microsoft Access, SQL Server, Oracle, etc)
- Onsite Server Database Encryption
- End user certificate (end users can access HMIS only from designated work computers)

Participating Agencies shall sign a Partnership Agreement (page 49) and comply with the stated requirements. Agencies will be granted access to the RIHMIS software system after:

- The Partnership Agreement (PA) has been signed with RI COALITION FOR THE HOMELESS, Rhode Island Housing Mortgage and Finance Corporation, and
- Agencies put into place the stated requirements in the PA.
- Two – 2 hour trainings per case manager. Input individual and family into the RIHMIS training site.

Agencies agree to comply with the policies and procedures approved by the RIHMIS Steering Committee.

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POLICY 2: RIHMIS STEERING COMMITTEE

A Steering Committee, convened by RI COALITION FOR THE HOMELESS, representing stakeholders to this project, will advise all project activities. The committee meets on a schedule it determines. (A current RIHMIS Steering Committee Membership List may be obtained from RI COALITION FOR THE HOMELESS).

The RIHMIS Steering Committee guides this project, serves as the decision making body and provides advice and support to the RI COALITION FOR THE HOMELESS staff as well as providing recommendations to the Housing Resources Commission.

The RIHMIS Steering Committee will take actions that ensure adequate privacy protection provisions in project implementation.

Membership of the RIHMIS Steering Committee will be established according to the following guidelines:

- The Continuum of Care (CoC) will appoint two individuals who will represent their members and communicate back to them.
- The CoC is responsible to find a replacement for any representative that is participating inconsistently or is inactive.
- The RIHMIS Steering Committee has the authority to add representatives from other sectors of the community in a method it deems appropriate.

The RIHMIS Steering Committee has decision making authority in the following areas:

- Determining the guiding principles that should underlie the implementation activities of the RIHMIS, including participating organizations, consumer involvement and service programs;
- Selecting the minimal data elements to be collected by all programs participating in the RIHMIS project;
- Defining criteria, standards, and parameters for the release of aggregate data; and
- Approving the software vendor

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POLICY 3: RIHMIS MANAGEMENT

The Executive Director of RI Housing & Mortgage Finance Corporation is responsible for oversight of all contractual agreements with funding entities, and the RI Coalition for the Homeless' adherence to the guiding principles, as determined by the RIHMIS Steering Committee.

Governance Procedures:

- The Statewide RIHMIS Steering Committee holds the final authority for all decisions related to the statewide governance of the RIHMIS. RI COALITION FOR THE HOMELESS is responsible for the day-to-day operation and oversight of the system and the RIHMIS Steering Committee grants RI COALITION FOR THE HOMELESS the authority to act on its behalf to address operational and system level concerns as they arise. This authority may be delegated to third parties at the discretion of RI COALITION FOR THE HOMELESS' management. Decisions made or actions authorized by RI COALITION FOR THE HOMELESS which do not satisfy an interested party, which may be an agency(ies) or a client(s), may be brought before the RIHMIS Grievance Committee for review. (See Facts Sheet, page 61)
- The Grievance Committee members shall not have a conflict of interest for the grievance they are adjudicating. Membership will consist of the Chair of the Steering Committee, one CoC representative, and three Steering Committee members.

RI COALITION FOR THE HOMELESS' responsibilities for the operation and oversight of the system include:

- Management of technical infrastructure;
- Planning, scheduling, and meeting statewide project objectives;
- Coordinating training and technical assistance including an annual series of training workshops for end users, agency administrators; and
- Implementing software enhancements approved by the RIHMIS Steering Committee.

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POLICY 4: STATEWIDE SYSTEM ADMINISTRATION FUNCTIONS

RI COALITION FOR THE HOMELESS RIHMIS staff will administer the RIHMIS software system for all users and will supervise system administration functions on agency and statewide levels.

RI COALITION FOR THE HOMELESS RIHMIS staff will work cooperatively with Continuum of Care technical staff and consultants.

RI COALITION FOR THE HOMELESS' responsibilities include:

- Organizing training and technical assistance to participating agencies on all RIHMIS policies and procedures related to authorizing access to the statewide information system, including agency setup, questions from users, network questions and system functionality questions;
- Overseeing system administration with concentration on internal and external security protocols;
- Monitoring access to the web based application through automated queries and software application protocols;
- Responding to system needs on a schedule to be determined by RI COALITION FOR THE HOMELESS and approved by the Steering Committee and as needed, insuring implementation of a disaster recovery plan;
- Coordinating assistance with data analysis, findings, and report writing;
- Coordinating provision of technical assistance with program sites throughout the state, including on site training and technical assistance;
- Coordinating implementation of software enhancements approved by the RIHMIS Steering Committee; and
- Conducting training and supervising system administration functions in a way that respects the dignity of the people whose data is being collected.

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POLICY 5: PARTICIPATING AGENCY RESPONSIBILITY

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Each Participating 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 HIPAA, HUD DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT Docket 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 RIHMIS principles, policies and procedures outlined in this document.

The Participating Agency:

- Holds final responsibility for the adherence of the agency's personnel to the HIPAA, HUD DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT Docket 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 ensuring adherence to the RIHMIS principles, policies and procedures outlined in this document;
- Is responsible for all activity associated with agency staff access and use of the RIHMIS data system;
- Is responsible for establishing and monitoring agency procedures that meet the criteria for access to the RIHMIS System, as detailed in the policies and procedures outlined in this document;
- Will put in place policies and procedures to prevent any misuse of the software system by designated staff;
- Agrees to allow access to the RIHMIS System only to staff who have been trained in the RIHMIS system and who have a legitimate need for access. Need exists only for those shelter 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; and
- Agrees to follow accepted change control procedures for all configuration changes as outlined in the RIHMIS System Administrators Manual.

The 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 RIHMIS system;
- Ensure organizational adherence to the RIHMIS 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; and
- Provide prompt and timely communications of data, changes in license assignments, and user accounts and software to the RIHMIS Systems Administrator.
- Notify RI COALITION FOR THE HOMELESS RIHMIS staff of any issue relating to system security or client confidentiality.

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POLICY 6: PARTICIPATING AGENCY ADMINISTRATOR

Every Participating Agency may designate one person to be the Agency Administrator who holds responsibility for the coordination of the system software in the agency.

The Agency Administrator will be responsible for duties including:

- Editing and updating agency information;
- Ensuring that access to the RIHMIS is requested for authorized staff members only after they have:
 - a. received training;
 - b. satisfactorily demonstrated proficiency in use of the software; and
 - c. demonstrated understanding of the Policies and Procedures and agency policies referred to above.
- Granting technical access to the software system for persons authorized by the Agency's leadership by requesting the statewide systems administrator to create passwords and grant licenses needed to enter the system;
- Designating each individual's level of access;
- Ensuring new staff persons are trained on the uses of the RIHMIS software system, including review of the Policies and Procedures in this document and any agency policies which impact the security and integrity of client information;
- Notifying all users in their agency of interruptions in service;
- Serving as point-person in communicating with the RI COALITION FOR THE HOMELESS' RIHMIS Systems Administrator;
- Facilitating timely reporting from the Agency she/he represents (unless the Agency has designated another person for this function); and
- Working cooperatively with RI COALITION FOR THE HOMELESS' RIHMIS technical staff and consultants.

The Agency Administrator is also responsible for implementation of data security policy and standards, including:

- Administering agency-specified business and data protection controls;
- Administering and monitoring access control;
- Providing assistance in and/or coordinating the recovery of data, when necessary; and
- Detecting and responding to violations of the Policies and Procedures or agency procedures.

RI COALITION FOR THE HOMELESS will coordinate training and technical assistance for Agency Administrators.

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POLICY 7: USER

All individuals at the RI COALITION FOR THE HOMELESS, RIHMIS staff, and at the participating agency levels who require legitimate access to the software system will be granted such access after training and agency authorization. Individuals with specific authorization can access the system software application for the purpose of conducting data management tasks associated with their area of responsibility.

Responsibilities:

- The RI COALITION FOR THE HOMELESS' RIHMIS Systems Administrator agrees to authorize use of the RIHMIS 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 RIHMIS responsibilities.
- The Participating Agency agrees to authorize use of the RIHMIS 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 participating agency responsibilities.

Users are any persons who use the RIHMIS software for data processing services. They must be aware of the data's sensitivity and take appropriate measures to prevent unauthorized disclosure. Users are responsible for protecting institutional information to which they have access and for reporting security violations. Users must comply with the data security policy and standards as described and stated by the Agency and HUD baseline requirements stated in the Final Notice Docket No. FR-4848-N-02. Users are accountable for their actions and for any actions undertaken with their usernames and passwords. Users must advise the Agency Administrator or RI COALITION FOR THE HOMELESS System Administrator if their passwords are 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.

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POLICY 8: TRAINING SCHEDULE

RI COALITION FOR THE HOMELESS' RIHMIS staff will coordinate ongoing training schedules for Systems Administrators, Agency administrators, and end Users. Training will occur on a regular basis. The schedule of trainings will be determined by RI COALITION FOR THE HOMELESS.

Training schedule:

Basic: Introduction to the RIHMIS System (End User Training)

- Introduction to the RIHMIS Project
- Review of applicable policies and procedures
- Connecting to the Internet
- Logging on to the RIHMIS System
- Entering client information including demographic, services, bed register, HUD worksheet and goals and outcomes

Intermediate: Overview of the RIHMIS Project (Agency Administrator)

- Review of agency technical infrastructure including roles and responsibilities
- Review of security policies and procedures
- Overview of agency administrative functions
- Setting up users and assigning access levels
- Entering and updating information pertaining to the participating agency
- Review of RIHMIS technical infrastructure

Advanced: Reporting with the RIHMIS System

- Introduction to the report writing tool
- Using existing reports
- Creating new reports
- Exporting information to other software applications

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POLICY 9: AMENDING THE POLICIES AND PROCEDURES

These Policies and Procedures may be amended. It is expected that information will be added, removed and altered as necessary.

The continuum has representation on the RIHMIS Steering Committee. Any changes suggested by any party in the continuum may be presented by a member of the RIHMIS Steering Committee or any RI COALITION FOR THE HOMELESS RIHMIS staff member to the RIHMIS Steering Committee. A decision on each suggestion will be made according to the RIHMIS Steering Committee procedure for making decisions.

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SECTION 2:

PARTICIPATION REQUIREMENTS



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POLICY 10: PARTICIPATION AND IMPLEMENTATION REQUIREMENTS

Participation Agreement Requirements

- **Identification of Agency Administrator:** Designation of one key staff person to serve as Agency Administrator. The Agency Administrator responsibilities include:
 - a. Requesting the creation of usernames and passwords;
 - b. Monitoring software access, among other activities;
 - c. Ensuring training of new staff persons on how to use the RIHMIS System; and
 - d. Communicating with the RIHMIS staff about user access and other RIHMIS activities at the agency level.
- **Security Assessment:** Meeting of Agency Executive Director or designee, Program Manager/Administrator and Agency Administrator with RI COALITION FOR THE HOMELESS' RIHMIS staff member to assess and complete Agency Information Security Protocols.
- **Training:** Commitment of Agency Administrator and designated staff persons to attend training(s) prior to accessing the system online
 - a. **ALL** Security Information paperwork needs to be complete and signed by Executive Director or designee in order for Participating Agency Staff to attend training.
- **Interagency Data Sharing Agreements:** Interagency Data Sharing Agreements must be established between any shelter/service program where sharing of client level information is to take place, excluding Client, HUD, Food and Shelter Board and Additional Profile information. (See Interagency Data Sharing Agreement. (page 57)
- **Client Data:** Agencies must:
 - a. Secure written permission from the client to enter the client's data (page 59) into the RIHMIS.
 - b. Secure a release of information from the client to share personal information with other agencies - excluding Client, HUD, and Food and Shelter Board, and Additional Profile information - to share it electronically.
 - c. Provide written explanation to each client of how information is to be used and stored (page 61) and on the client's recourse if s/he feels data is misused e.g. grievance policy (page 29). Any incident regarding compromise of client confidentiality should be reported to the RI COALITION FOR THE HOMELESS RIHMIS staff immediately.
- The HUD Data and Technical Standard requires as a baseline requirement that every Covered Homeless Organization (CHO) post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting protected personal information (PPI). While RIHMIS Policy requires written consent, individual Providers may wish to use the following language to assure that they meet this HUD's baseline standard: "we collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate".

Protected Personal Information (PPI) is defined by HUD as "Any information maintained by or for a Covered Homeless Organization about a living homeless client or homeless individual that: (1) Identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual".

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POLICY 11: RI COALITION FOR THE HOMELESS RIHMIS DATA SECURITY RESPONSIBILITY

RI COALITION FOR THE HOMELESS will manage the contractual relationship with a third party software development corporation who will in turn continue to develop, implement and maintain all components of operations of the web-based system including a data security and certificate program. The RI COALITION FOR THE HOMELESS' RIHMIS staff, in consultation with the RIHMIS Steering Committee, will:

- Define the program;
- Implement its standards; and
- Promote awareness of the program to all interested parties.

Access to areas containing statewide RIHMIS equipment, data, and software will be secured. All client-identifying information will be strictly safeguarded in accordance with appropriate technical safeguards. All data will be securely protected to the maximum extent possible. Ongoing security assessments to include penetration testing will be conducted on a regular basis.

The scope of security includes:

- Technical safeguards;
- Physical safeguards, including, but not limited to locked doors;
- Network protocols and encryption standards such as https/ssl encryption (an indicator of encryption use); and
- Client data security (Data Encryption);
- Server and client-side certificates.
- Encryption on the database server where the client data is stored.

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POLICY 12: IMPLEMENTATION REQUIREMENTS

For Stage 1 implementation, RI COALITION FOR THE HOMELESS RIHMIS staff will assist Participating Agencies in the completion of all required documentation prior to implementation.

On Site Security Assessment Meeting:

Agency staff will meet with RI COALITION FOR THE HOMELESS' RIHMIS staff member who will assist in completion of the Agency's Information Security Protocols.

Partnership Agreement (page 49):

The Partnership Agreement refers to the document agreement made between the participating agency and the RIHMIS project. This agreement includes commitment to enter information on clients served within the agency's participating programs. This document is the legally binding document that refers to all laws relating to privacy protections and information sharing of client specific information.

User Agreement (page 55):

This form is signed by the case managers and agency administrators to allow them access to the RIHMIS system. Users must participate in training before given live access to the RIHMIS system. This includes two – 2 hour trainings and the data entry of one individual and family record into the RIHMIS training site.

Identification of Referral Agencies:

The RIHMIS provides a resource directory component that tracks service referrals for clients. Other HMIS systems have found it helpful for agency staff and other users to have a compiled list of referral agencies entered into the HMIS System Resource Directory when the agency first begins to use the application. It is recommended that Participating Agencies activate this feature. RI COALITION FOR THE HOMELESS' RIHMIS staff will assist Participating Agencies should they decide to use this feature. Participating Agencies will need to update and correct this information as necessary.

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POLICY 13: INTERAGENCY DATA SHARING AGREEMENTS

Responsibilities:

Each agency is responsible for the initiation, negotiation, and completion of Interagency Data Sharing Agreements (page 57) prior to the sharing of information between agencies, excluding Client, HUD, Food and Shelter Board and Additional Profile information. Each Executive Director must sign the document to signify his/her agreement and to certify that their internal policies and procedures allow that such an agreement can be made, and that their client consent forms and procedures have been updated to allow for the sharing of client information between the named agencies.

The RI COALITION FOR THE HOMELESS systems administrator or his/her designee is responsible for providing technical assistance related to system audits as may be required to comply with individual, agency, or government requests.

Written Agreement:

Participating Agencies wishing to share information electronically through the RIHMIS System - excluding Client, HUD, Food and Shelter Board and Additional Profile information - will provide, in writing, an agreement that has been signed between the Executive Directors of Participating Agencies. Completed agreements will be presented to RI COALITION FOR THE HOMELESS for review and archival.

- See Interagency Sharing Agreement (page 57).
- Agency staff is responsible for abiding by all the policies stated in the Interagency Sharing Agreement.

Procedure:

- Agencies wishing to participate in a data sharing agreement contact RI COALITION FOR THE HOMELESS' RIHMIS staff to initiate the process.
- Executive Directors complete the Interagency Sharing Agreement. Each participating agency retains a copy of the agreement and a master is filed with the RI COALITION FOR THE HOMELESS.
- Agency Administrators receive training on the technical configuration to allow data sharing.
- Each Client whose record is being shared must have agreed via a written client consent form to have data shared. A client must be informed both orally and in writing what information is proposed to be shared and with whom it is to be shared.

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POLICY 14: WRITTEN CLIENT CONSENT PROCEDURE FOR ELECTRONIC DATA SHARING

Client Procedures from each Participating Agency, including permission to enter data into the RIHMIS system and release of information for sharing client data must be on file at each agency.

Each Covered Homeless Organization (CHO) must publish the RIHMIS privacy notice describing policies and practices for the processing of PPI and must provide a copy of this privacy notice to any individual upon request. If the CHO maintains a web page, the current privacy notice must be posted. An amendment to the privacy notice regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated. All amendments to the privacy notice will be consistent with the requirements of these privacy standards. The RIHMIS will maintain permanent documentation of all privacy notice amendments. Lastly, CHOs are reminded that they are obligated to provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. In addition, CHOs that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program.

The PPI policy will specify the purposes for which it collects PPI and will describe all uses and disclosures. **A CHO may use or disclose PPI from the RIHMIS only if the use or disclosure is allowed by the HUD HMIS Final Notice, and is described in this privacy notice. HIPAA regulations receive precedents over the HUD Final Notice PPI policies.** RIHMIS Policy requires written as well as oral consent as a fundamental component of the concept related to informed consent. Except for first party access to information and any required disclosures for oversight of compliance with RIHMIS privacy and security standards, all uses and disclosures are permissive and not mandatory. Uses and disclosures not specified in the privacy notice can be made only with the consent of the individual or when required by law.

A CHO must allow an individual to inspect and to have a copy of any PPI about the individual. A CHO must offer to explain any information that the individual may not understand. While a CHO must consider any request by an individual for correction of inaccurate or incomplete PPI pertaining to the individual, the CHO is not required to remove any information but may alternatively choose to mark information as inaccurate or incomplete and may supplement it with additional information. A CHO - in accordance with HUD's Final Notice - may reserve the ability to rely on the following reasons for denying an individual inspection or copying of the individual's PPI: (1) Information compiled in reasonable anticipation of litigation or comparable proceedings; (2) information about another individual (other than a health care or homeless provider); (3) information obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) if disclosure would reveal the source of the information; or (4) Information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual. Also, a CHO may reject repeated or harassing requests for access or correction. A CHO that denies an individual's request for access or correction must explain the reason for the denial to the individual and must include documentation of the request and the reason for the denial as part of the protected personal information about the individual.

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POLICY 15: CONFIDENTIALITY AND INFORMED CONSENT

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Informed Consent: Includes both an oral explanation and written client consent for each client.

Oral Explanation:

All clients will be provided an oral explanation of the RIHMIS. The Participating Agency will provide an oral explanation of the RIHMIS and the terms of consent. The agency is responsible for ensuring that this procedure takes place prior to every client interview. The Oral Explanation must contain the following information: (Sample script page 58)

1. What the RIHMIS is:
 - Computer based information system that homeless services agencies across the state use to capture information about the persons they serve
2. Why the agency uses it
 - to understand their clients' needs
 - help the programs plan to have appropriate resources for the people they serve to inform public policy in an attempt to end homelessness
3. Security
 - Only staff who work directly with clients or who have administrative responsibilities can look at, enter, or edit client records
4. Privacy Protection
 - No information other than Client profile, HUD required data, Food and Shelter Board information, and Additional Profile information will be released to another agency without written consent
 - Client has the right to not answer any question, **unless entry into a program requires it**
 - Client information is transferred in an encrypted format to the RIHMIS database and encrypted on the database
 - Client has the right to know who has added to, deleted, or edited their RIHMIS electronic client record
 - Information that is transferred over the web is through a 128 bit encrypted secure connection
5. Benefits for clients.
 - Case manager tells client what services are offered on site or by referral through the assessment process
 - Case manager and client can use information to assist clients in obtaining resources that will help them find and keep permanent housing

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Written Client Consent to Enter Data:

Each client must provide written permission to authorize the agency to enter information into the RIHMIS. (Page 59)

Written Client Consent to Share Data:

Each Client whose record is being shared electronically with another Participating Agency must agree via a written client release of data form to have their data shared. A client must be informed what information is being shared and with whom it is being shared. A client must also be informed of the expiration date of the consent. (Page 59)

Information Release:

The Participating Agency agrees not to release client identifiable information to any other organization pursuant to federal and state law without proper client consent.

Federal/State Confidentiality Regulations:

The Participating Agency will uphold Federal and State Confidentiality regulations to protect client records and privacy. In addition, the Participating Agency will only release client records with written consent by the client, unless otherwise provided for in the regulations.

1. The Participating Agency will abide specifically by the Federal confidentiality rules regarding disclosure of alcohol and/or drug abuse records.
2. The Participating Agency will abide specifically by the State of Rhode Island's general laws providing guidance for release of client level information including who has access to client records, for what purpose, and audit trail specifications for maintaining a complete and accurate record of every access to and every use of any personal data by persons or organizations.

Encryption:

The Participating Agency understands that client identifiable data is inaccessible to unauthorized users.

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POLICY 16: MINIMUM DATA ELEMENTS

Data Elements:

Data Category: Based on HUD Data and Technical Standards, SRO, ESG, UNITED WAY, RIHMIS

Number of Persons Served

Total Program Capacity

Total Singles Served

Total Families Served

Singles Ages: 62 and over; 51 to 61; 31 to 50

18 to 30; 17 and under

Persons in Families Ages: 62 and over; 51 to 61

31 to 50; 18 to 30;

13 to 17; 6 to 12; 1 to 5; Under 1

Sex: Female/ Male

Number of Adults in Family

Number of Children in Family

Veterans Status

Highest Education Level

Date of Birth

Name

Last Zip Code

Month/Year Person Left Last Permanent Address:

Program Code, Facility Info and Location

Date of Entry into System

Date of Exit

Unique client ID #

Ethnicity/Race:

- a. Hispanic/Latino(a)
- b. Pacific Islander/Hawaiian
- c. Asian
- d. Non Hispanic/Latino(a)
- e. Native American
- f. Black/African American
- g. Caucasian
- h. Other

Special Needs:

- a. Mental Illness
- b. Drug Abuse
- c. Alcohol Abuse
- d. Dual Diagnosis
- e. Domestic Violence
- f. Domestic Violence
- g. Physically Disabled
- h. Medical Illness/Disability
- i. Developmental Disability
- j. HIV/AIDS
- k. Other

Prior Living Situation:

- a. Non housing (street, etc.)
- b. Emergency Shelter
- c. Transitional Housing
- d. Psychiatric Facility
- e. Substance abuse TX Facility
- f. Hospital
- g. Jail/Prison
- h. Domestic Violence Situation
- i. Relatives/Friends
- j. Rental Housing
- k. Other (specify)

Monthly Income at Entry:

- a. No income
- b. \$1.00-\$150.00
- c. \$151.00-\$250.00

- d. \$251.00-\$500.00
- e. \$501.00-\$1000.00
- f. \$1001.00-\$1500.00
- g. \$1501.00-\$2000.00
- h. \$2001.00-over

Monthly Income at Exit:

- a. No Income
- b. \$1.00-\$150.00
- c. \$151.00-\$250.00
- d. \$251.00-\$500.00
- e. \$501.00-\$1000.00
- f. \$1001.00-\$1500.00
- g. \$1501.00-\$2000.00
- h. \$2001.00-over

Income Source at Entry:

- a. SSI
- b. SSDI
- c. Social Security
- d. General Public Assist
- e. TANF
- f. Child Support
- g. Veterans Benefits
- h. Employment
- i. Unemployment benefits
- j. Medicare
- k. Medicaid
- l. Food Stamps
- m. Other (specify)
- n. No Financial Resources

Income Source at Exit:

- a. SSI
- b. SSDI
- c. Social Security
- d. General Public Assist
- e. TANF
- f. Child Support
- g. Veteran's Benefits
- h. Employment
- i. Unemployment Ben.
- j. Medicare
- k. Medicaid
- l. Food Stamps
- m. Other (Specify)
- n. No Financial Resources

Length of Stay in Program:

- a. Less than 1 month
- b. 1 to 2 months
- c. 3 to 6 months
- d. 7 to 12 months
- e. 13 to 24 months
- f. 25 months to 3 years
- g. 4 years to 5 years
- h. 6 years to 7 years
- i. 8 years to 10 years
- j. Over 10 years

Reason for Leaving:

- a. Left for housing before completing program
- b. Completed program
- c. Non payment rent/fees
- d. Non compliance
- e. Criminal activity/destruction, violence
- f. Reached max time
- g. Needs could not be met
- h. Disagreement w/rules/persons
- i. Death
- j. Other (specify)
- k. Unknown (disappear)

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Destination:

- a. Rental Housing (no subsidy)
- b. Public Housing
- c. Section 8
- d. Shelter + Care
- e. HOME
- f. Other Subsidy
- g. Ownership
- h. Moved to Family/Friends
- i. Psychiatric hosp/facility
- j. In patient SA TX program
- k. Jail/Prison
- l. Emergency Shelter
- m. Supportive Housing Program
- n. Other (specify)
- o. Unknown

Supportive Services Utilized:

- a. Outreach
- b. Case Management
- c. Life Skills (outside CM)
- d. Drug/Alcohol Services
- e. Mental Health Services
- f. HIV/AIDS services
- g. Education
- h. Housing Placement
- i. Employ assistance
- j. Child Care
- k. Transportation
- l. Legal
- m. Other (specify)

Referred to Program By:

- a. Another Shelter
- b. Probation
- c. Social Services Staff
- d. Clergy
- e. Hospital
- f. DOC
- g. Psychiatric Facility
- h. Substance Abuse Facility
- i. Police
- j. Other (Specify)
- k. Outreach Workers
- l. PHA Waiting List

Reason for Not Entering Program:

- a. Refused to participate
- b. Not Homeless
- c. Did not meet eligibility. (specify)
- d. No Vacancies
- e. Not Known
- f. Other (specify)

Duplicated Count

Unduplicated Count

Number of Non-homeless Individual Participants (SRO)

Primary Reason for Homelessness:

- a. Substance abuse
- b. Unemployment
- c. Underemployment
- d. Domestic Violence (Victim)
- e. Relocation
- f. Mental Illness
- g. Disaster
- h. Family/Friend Eviction
- i. Eviction
- j. Jail/Prison release
- k. Hosp. Discharge
- l. Psych Facility Discharge

- m. Substance Facility Discharge
- n. Detoxification Discharge
- o. Lost custody of children
- p. Divorce/Separation
- q. Medical Illness
- r. Physical Illness
- s. Voluntary

Secondary Reason for Homelessness:

- a. Substance abuse
- b. Unemployment
- c. Underemployment
- d. Domestic Violence (Victim)
- e. Relocation
- f. Mental Illness
- g. Disaster
- h. Family/Friend Eviction
- i. Eviction
- j. Jail/Prison release
- k. Hospital. Discharge
- l. Psych Facility Discharge
- m. Substance Facility Discharge
- n. Detoxification Discharge
- o. Lost custody of children
- p. Divorce/Separation Medical Illness
- q. Physical Illness Voluntary

Substance Abuse:

First Drug of Choice:

- a. Alcohol
- b. Heroin
- c. Cocaine
- d. Crack

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RIHMIS POLICIES AND PROCEDURES HANDBOOK POLICY 17:

INFORMATION SECURITY PROTOCOLS

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 Participating Agency must develop rules, protocols or procedures to include addressing each of the following:

- Assignment of user accounts
- Unattended workstations
- Physical access to workstations
 - a. The implementation of hardware and/or software firewall to secure local systems/networks from malicious intrusion.
- Use of Antivirus 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.
- Computer Operating Systems are regularly updated for security and critical updates provided by the software vendor.
- Use of Anti-Spy ware, 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 and spy ware definitions from the software vendor.
- Password complexity, expiration, and confidentiality
- Policy on users including not sharing accounts
- Client record disclosure
- Report generation, disclosure and storage
- Maintain and routinely monitor all system access logs for systems which have access to HMIS data.
- Notice to the RIHMIS Systems Administrator of all computers using RIHMIS that go off-line so that certificates, hard drives and access URLs can be properly disposed of.

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POLICY 18: CONNECTIVITY

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Because vast amounts of data are transmitted, 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. RI COALITION FOR THE HOMELESS' RIHMIS staff can assist participating agencies to identify Internet providers. However, it is the responsibility of the participating agency to obtain the Broadband Internet connection.

POLICY 19: MAINTENANCE OF ON-SITE COMPUTER EQUIPMENT

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Executive Director or designee of each participating agency will be responsible for the maintenance and disposal of on-site computer equipment and data used for participation in the RIHMIS including the following:

1. Computer Equipment: The Participating 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 RIHMIS Project.
2. Backup: While the RIHMIS system is a server based system, and thus all application level data backups are the vendor's responsibility, each local system is also subject to failure. However the Participating Agency is responsible for supporting a backup procedure for each computer connecting to the RIHMIS Project. A backup procedure may include archival of old existing data, and other general backups of user documents and files.
3. Internet Connection: The Participating Agency is responsible for troubleshooting problems with Internet Connections.
4. Data Storage: The Participating Agency agrees to only download and store data in an encrypted format, using industry standard access controls to secure the data. This may include the use of encrypted archive files such as secured WinZip/PKZip, or 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.
5. Data Disposal: The Participating Agency agrees to dispose of documents that contain identifiable client level data in a manner that will protect client confidentiality. Methods may include:
 - Shredding paper records;
 - Deleting any information from media and destroying the media before disposal; and/or
 - Triple formatting hard drive(s) of any machine containing client-identifying information before transfer of property and/or destruction of hard drive(s) of any machine containing client-identifying information before disposal
6. Data Retention: Protected Personal Information (PPI) that is not in current use seven years after the PPI was created or last changed must be deleted 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.

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POLICY 20: RIHMIS STEERING COMMITTEE GRIEVANCE PROCEDURE

The Statewide RIHMIS Steering Committee holds the final authority for all decisions related to the statewide governance of the RIHMIS System. Decisions made or actions authorized by RI COALITION FOR THE HOMELESS regarding the RIHMIS which do not satisfy an interested party, including those at continuum, agency or client levels, may be brought before the RIHMIS Grievance Committee for a decision in accordance with the RIHMIS Grievance Procedure.

The Grievance Committee members shall not have a conflict of interest for the grievance they are adjudicating. Membership will consist of the Chair of the Steering Committee, one CoC representative, and three Steering Committee members.

Client Grievance:

Clients of participating agencies use the participating agency's existing grievance procedures regarding unsatisfactory services or use and disclosure of Personal Protected Information (PPI) in the RIHMIS, as these issues are most likely within a participating agency. **It is only when the issue involves the actions of the RIHMIS statewide operation that that the statewide RIHMIS Grievance Procedure is to be used. Additionally, the RIHMIS Grievance Procedure is not intended for use as an "appeal" for a local decision.**

If a client wants to file a complaint:

1. The Client complaint is to be brought to the attention of the Participating Agency's Executive Director or designee, who shall assist the client in the Grievance Procedure.
2. The complaint is to be stated in writing.
3. The complaint shall be returned to the RIHMIS party who has the ability and authority to take corrective action. If needed the RIHMIS System Administrator or designee will assist in identifying the appropriate party.
4. The Client and the Participating Agency's representative meet together with the appropriate RIHMIS party to resolve the complaint.
5. The actions and resolutions shall be in writing.
6. If the matter cannot be resolved to the satisfaction of all parties, the RIHMIS Steering Committee will convene the Grievance Committee, giving them information concerning all actions taken to date.
7. The Grievance Committee will meet no later than ten (10) working days after being convened to hear the complaint.
8. The Grievance Committee will resolve the complaint within five (5) working days after meeting.
9. Should the client want to appeal the Grievance Committee's decision, the RIHMIS Steering Committee will hear the complaint at its next scheduled meeting and resolve the complaint in the manner in which it makes its decisions. This decision is final.
10. All actions and resolutions will be in writing. Both the Client and RIHMIS party involved will have a copy describing the resolution of the complaint

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Participating Agencies or a Continuum of Care:

Participating Agencies who are participating in the RIHMIS with a Continuum of Care are to first ascertain if the issue is at the Continuum of Care level and if so to resolve it at the Continuum of Care level.

If a Participating Agency, Continuum of Care or any combination of such organizations has a complaint about a decision or an action of the RIHMIS staff concerning the RIHMIS or any issue about which the RIHMIS has responsibility, they should first bring the matter to the attention of the RIHMIS System Administrator or designee and/or the party who has the ability and authority to take corrective action as a verbal, informal Grievance Procedure.

Informal Grievance Procedure:

The informal grievance procedure involves bringing the issue verbally to the RIHMIS party who has the ability and authority to take corrective action. It is intended that discussion between the parties shall resolve the issues.

Formal Grievance Procedure:

If the matter is not resolved through the Informal Grievance Procedure to the satisfaction of the Participating Agency or Continuum of Care the Formal Grievance Procedure should be initiated.

1. The complaint should be in writing and submitted to the RIHMIS Steering Committee who will convene the Grievance Committee.
2. The Grievance Committee will meet no later than ten (10) working days after being convened and notified of the complaint and will consider information from all parties involved.
3. The Grievance Committee will hear the complaint from all parties.
4. The Grievance Committee will resolve the complaint within five (5) working days.
5. The actions and resolution of the grievance shall be in writing.
6. If the grieving party is not satisfied, the decision may be appealed to the RIHMIS Steering Committee, who will hear and resolve the complaint at its next regularly scheduled meeting. This decision is final.

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SECTION 3:

USER, LOCATION, PHYSICAL AND DATA ACCESS



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POLICY 21: ACCESS LEVELS FOR SYSTEM USERS

User accounts will be created and deleted by the RIHMIS Systems Administrator or designated Agency Administrator under authorization of the RIHMIS Systems Administrator.

Designation of RIHMIS User Levels: There are different levels of access to the RIHMIS. These levels are reflective of the access a user has to client level paper records. Access levels should be need-based.

A CHO must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to sign (upon hire, and when modified) an end user agreement - as provided in the Attachment section - to acknowledge receipt of a copy of the privacy notice and to pledge to comply with the privacy notice as issued.

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POLICY 22: ACCESS TO DATA

User access privileges to system data server are stated below.

User Access:

Users will only be able to view the data entered by users of their own agency. Security measures exist within the RIHMIS software system which restricts agencies from viewing each other's data. Exceptions are: Client profile, HUD required data, Food and Shelter Board information and Additional Profile information.

Raw Data:

Users who have been granted access to the RIHMIS Report Writer tool have the ability to download and save client level data onto their local computer. Once this information has been downloaded from the RIHMIS server in raw format to an agency's computer, these data then become the responsibility of the agency. A participating Agency must develop protocols regarding the handling of data downloaded from the RIHMIS Report Writer tool or from any other feature of the software.

Agency Policies Restricting Access to Data:

The Participating Agencies must establish protocols for internal access to data. These access protocols must contain the following elements:

1. Physical security policies and procedures
2. User security training
 - User orientation
 - Periodic reminders of internal procedures
 - An industry recognized user authentication system
3. Access authorization policies and procedures
4. Access revocation policies and procedures
5. Incident reporting policies and procedures
6. Sanction policies and procedures
7. Termination procedures
8. Risk Assessment
9. Risk Management

Access to Statewide RIHMIS System Data:

Access will be granted based upon policies developed by the RIHMIS Steering Committee and are reflected in the Partnership Agreement, license fees payments, ongoing technical support and user training.

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POLICY 23: ACCESS TO CLIENT PAPER RECORDS

Agencies shall follow their existing policies and procedures and applicable local, state and federal regulations for access to client records on paper.

Each agency must secure any paper or other hard copy containing personal protected information that is either generated by or for the RIHMIS, including, but not limited to reports, data entry forms and signed consent forms.

All paper or other hard copy generated by or for the RIHMIS that contains PPI must be directly supervised when the hard copy is in a public area. When agency staff is not present, the information must be secured in areas that are not publicly accessible. Written information specifically pertaining to user access (e.g., username and password) must not be stored or displayed in any publicly accessible location.

All RIHMIS paper records that contain client information must be destroyed seven (7) years after the client has left the program.

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POLICY 24: UNIQUE USER ID AND PASSWORD

Authorized users will be granted a unique user ID and password:

- Each user will be required to enter a User ID with a Password in order to logon to the system
- User ID and Passwords are to be assigned to individuals.
- The User ID will be eight random alpha-numeric characters.
- The Password must be no less than eight and no more than sixteen characters in length which will not be comprised of words, backward words, names, backward names or any identifiable acronym.
- The password must be alphanumeric.
- Users must use industry standard best practices when selecting their password including the following:
 - a. Use lower and upper case letters
 - b. User passwords must be random
 - c. Do not use passwords containing the names of a spouse, child or pet (similar names or backward names, places or things) and do not use birthdates or other easy to guess items.
- Written information specifically pertaining to user access (e.g., username and password) may not be stored or displayed in any publicly accessible location.

Password Reset:

- Initially each user will be given a password for one time use only. The first or reset password will be automatically generated by the RIHMIS System and will be issued to the User by the Systems Administrator, his designee or Agency Administrator. The first time temporary password can be communicated via telephone or in person. Thereafter, passwords will be communicated in verbal form in person or via telephone only to the User. The Agency Administrator will reset a password if necessary. Passwords will not be sent via e-mail.
- Forced Password Change (FPC) FPC will occur every forty-five days once a user account is issued. Passwords will expire and users will be prompted to enter a new password. Users may not use the same password consecutively, but may use the same password more than once.
- Unsuccessful logon: If a User unsuccessfully attempts to logon three times, the User ID will be “locked out” on the next attempt and access permission will be revoked and user will be unable to gain access until their password is reset in the manner stated above, but only after a verbal request is provided by that user to the RIHMIS Systems Administrator or Agency Administrator.
- All system accounts will be the responsibility of the RIHMIS Systems Administrator and/or Agency Administrator.

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POLICY 25: RIGHT TO DENY USER AND PARTICIPATING AGENCIES' ACCESS

Participating Agency or user access may be suspended or revoked for suspected or actual violation of the security protocols. Serious or repeated violation by users of the system may result in the suspension or revocation of an agency's access.

The procedure to be followed is:

1. All suspected violations of any security protocols will be investigated by the agency, the local systems administrator and the statewide systems administrator.
2. Any user found to be in violation of security protocols will be sanctioned by his/her agency. Sanctions may include but are not limited to a formal letter of reprimand, suspension of system privileges, revocation of system privileges, termination of employment and/or criminal prosecution.
3. Access may be restricted prior to completion of formal investigation if deemed necessary by the statewide systems administrator. If access is restricted, the systems administrator will notify a chair of the steering committee of the restriction and will consult with him/her about next steps.
4. Any agency that is found to have consistently and/or flagrantly violated security protocols may have their access privileges suspended or revoked.
5. All sanctions can be appealed to the Grievance Committee of the RIHMIS Steering Committee.

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POLICY 26: DATA ACCESS CONTROL

Agency Administrators at Participating Agencies and RI COALITION FOR THE HOMELESS' RIHMIS staff reserve the right to monitor access to system software.

- Agency Administrators at Participating Agencies and RI COALITION FOR THE HOMELESS' RIHMIS staff will regularly review user access privileges and remove identification codes and passwords from their systems when users no longer require access.
- Agency Administrators at Participating Agencies and RI COALITION FOR THE HOMELESS' RIHMIS staff may implement discretionary access controls to limit access to RIHMIS information based on application security designations. Examples of such designations include but are not limited to "Agency Administrator", "Case Manager", and "Volunteer".
- Participating Agencies and RI COALITION FOR THE HOMELESS' RIHMIS staff must audit all unauthorized accesses and attempts to access RIHMIS information.
- Audit records shall be kept at least six months, and Agency Administrators and the RI COALITION FOR THE HOMELESS' RIHMIS Systems Administrator shall regularly review the audit records for evidence of violations or system misuse.

Guidelines for data access control for the participating agency:

- The federal regulations state that: Physical Access to Systems with Access to the RIHMIS Data Computers that are used to collect and store RIHMIS data shall be staffed at all times when in public areas. When workstations are not in use and staff is not present, steps should be taken to ensure that the computers and data are secure and not publicly accessible. These steps should **minimally include:**
 - Logging off the data entry system, shutting down the computer, and storing the computer and data in a locked room
 - This could be accomplished through the use of an operating system such as Windows 2000, or Windows XP Pro, with individual profiles and system security policies enabled
- Each user should have a unique identification code.
- Each user's identity should be authenticated through an acceptable verification process.
- Passwords shall be the responsibility of the user and shall not be shared with anyone.
- Users should be able to select and change their own passwords, and must do so at least every forty-five days. A password cannot be re-used until 2 password selections have expired.
- Any passwords written down should be securely stored and inaccessible to other persons. Users should not store passwords on a personal computer for easier log on.

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POLICY 27: USING RIHMIS DATA FOR RESEARCH

Agencies participating in the RIHMIS should collect personal client information only when appropriate to provide services and/or for other specific purpose of the organization and/or when required by law. Purposes for which agencies collect protected personal information may include the following:

- a. to provide or coordinate services to clients
- b. to locate other programs that may be able to assist clients
- c. for functions related to payment or reimbursement from others for services that are provided
- d. to operate the agency, including administrative functions such as legal, audits, personnel, oversight, and management functions
- e. to comply with government reporting obligations
- f. when required by law
- g. for research purposes

RIHMIS Release of Data for Research Conditions:

- No client protected personal information for any reason may be released to unauthorized entities.
- Only de-identified aggregate data will be released.
- Aggregate data will be available in the form of an aggregate report or as a raw data set.
- Parameters of the aggregate data, that is, where the data comes from and what it includes will be presented with each report.
- Research results will be reported to the RIHMIS Steering Committee prior to publication, for publication approval by the RIHMIS Steering Committee.
- Research will be shared with the appropriate agencies after publication.
- RIHMIS Steering Committee will be granted the rights to utilize all findings (results).

The RIHMIS Steering Committee will review and respond to requests for the use of RIHMIS data for research with the Chair of the Steering Committee have the final decision.

SECTION 4:

TECHNICAL SUPPORT AND SYSTEM AVAILABILITY



Rhode Island HMIS Policies and Procedures Handbook

POLICY 28: PLANNED TECHNICAL SUPPORT

RI COALITION FOR THE HOMELESS RIHMIS staff in conjunction with local systems administrators, Agency Administrators and contracted third parties will coordinate technical support services on a planned schedule with each participating agency to:

- Assist Participating Agencies on the use of Entry/Exit forms and other paperwork
- Conduct on-site follow-up training if needed
- Coordinate follow-up data entry training if needed
- Review report writer
- Coordinate ongoing technical assistance as needed
- Assist agencies with network and end user computer security

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POLICY 29: PARTICIPATING AGENCY SERVICE REQUEST

To effectively respond to service requests, the following methods of communicating a service request from a Participating Agency to the RIHMIS staff have been developed:

- Service Request from Participating Agency
 1. End user informs Agency Management Staff (Executive Director/designee or Agency Administrator) of the problem.
 2. Agency Management Staff attempts to resolve issue. If unable to resolve, agency staff may contact RIHMIS staff directly in order to request expedited service. (Additional web based software may be used to facilitate the documentation of issues as well as assist with the communication of solutions. This software may be used to generate standard “Help file information”. Urgent issues however will still require telephone notification of the problem or concern in order to assure timely resolution).
 3. RIHMIS staff determines resources needed for service and if necessary, contacts vendor for support.
 4. RIHMIS staff contacts agency management staff to work out a mutually convenient service schedule and resolution to issue or concern.
- Chain of communication: (Problems should be resolved at the lowest possible level to assure minimum time to resolution).
 1. End User
 2. Agency Staff
 3. RIHMIS staff or support contact
 4. Statewide Systems Administrator
 5. Vendor
 6. Statewide System Administrator
 7. Agency Staff
 8. End User

POLICY 30: RIHMIS STAFF AVAILABILITY

Consistent with the user’s reasonable service request requirements, RIHMIS staff is available for Technical Assistance, questions, and trouble-shooting between the hours of 8:30 AM and 4:30 PM Monday to Friday.

SECTION 5:

STAGES OF IMPLEMENTATION



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POLICY 31: STAGE 1: START-UP AND INITIAL TRAINING (REQUIRED FOR RIHMIS)

Prior to beginning Stage 1, a Participating Agency needs to have:

1. Completed security assessment, including all participation and data sharing agreements as well as client consent protocols;
2. Identified an Agency Administrator; and
3. Made proper connectivity arrangements. Because there is a great quantity of data transfer Bowman requires that the participating agency have a Broadband Internet connection greater than 56K/90v. This includes DSL, Cable or Satellite Internet access. This Broadband Internet connection requirement will avoid lost staff time and staff frustration.

Stage 1 of implementation with the RIHMIS:

4. Participating Agency staff and RIHMIS staff meet for the Security Assessment meeting.
5. The site users and Agency Administrator receive training on uses of the RIHMIS application. The Coordinator training will cover RIHMIS System Configuration as well as creation of User IDs and passwords.
6. RIHMIS staff and Agency Administrator will arrange a follow-up site visit to conduct operative tests on the program's equipment, should this be needed.

Indicators to exit Stage 1: The Participating Agency must complete all Stage 1 Activities before moving onto Stage 2 including:

- Signed PA (Partnership Agreement) returned to Rhode Island Housing, then to RI COALITION FOR THE HOMELESS
- Creation of User IDs and passwords.
- Completed training on the training site with at least one individual and family entered into the training site.

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POLICY 32: STAGE 2: DATA ENTRY BEGINS (REQUIRED FOR RIHMIS)

To enter Stage 2, the Participating Agency needs to have completed Stage 1.

Stage 2 of implementation:

- Begins when a program's trained staff works to enter client data into the system using the HUD 40118 and Food and Shelter Board default assessment protocol. These default assessment protocols will be used as the guideline for users to create clients' records.
- The RIHMIS Stage 2 continues until data has been entered based on the defined minimum Data Elements on at least 100% of clients served or for an entire month for all clients served within the Participating Agency. This includes both basic client data, and entry/exit transactions required to support production of the HUD APR and Food and Shelter Board report.

Indicators to exit Stage 2:

- Interview and data sharing protocols have been established including:
 - a. Implementation of standard default interview protocols,
 - b. Use of interview protocols and
 - c. Data entry including Entry and Exit transactions.
 - d. Execution of data sharing and client consent protocols if information is to be shared.
- Data have been entered on at least 100% of all new or current clients served within participating programs or for an entire month for all clients served within the Participating Agency.

Participating Agencies need to complete all Stage 2 Activities before moving onto Stage 3.

Participating Agencies will receive support from RIHMIS staff to complete all stages, both required and optional. To ensure that all parties are comfortable with the process and progress for this stage, the Participating Agency and RIHMIS staff may meet again to assess if obstacles to progress exist.

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POLICY 33: STAGE 3: BASIC INFORMATION ON MOST CLIENTS (OPTIONAL STAGE)

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To enter Stage 3 data entry must be completed for 100 % of clients served **or** for an entire month on all clients served.

Stage 3 of implementation:

- Begins when staff utilizes the RIHMIS System application to maintain client records.
- Continues until the site has achieved 90 % entry and usage of Case Management functionality or has entered information for 3 months continually related to required data for all clients served.

Indicator to exit Stage 3:

- The site has achieved 100 % coverage related to entry of required data or has entered information for 3 months continually related to required data for all clients served.
- The site has created custom reports that support the analysis of aggregate data.
- The site has used the software to make client referrals and/or add Resource Agencies for future use related to agency/program referrals.

Benefits of completing Stage 3 include the fact that much data outcomes and reporting can be more easily generated such as:

- Standard reports including the HUD APR, Food and Shelter Board and Bed reports
- Turnover rates
- Demographics, including income sources, amounts and non-cash benefits
- Residential history patterns

Participating Agencies will receive support from RIHMIS staff to complete all stages, both required and optional. To ensure that all parties are comfortable with the process and progress for this stage, at the end of 3 months, from time of entry to the stage, should it be needed, the Participating Agency and RIHMIS staff will meet again to assess if obstacles to progress exist.

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POLICY 34: STAGE 4: EVALUATION OF OUTCOMES (OPTIONAL STAGE)

Stage 4 of implementation:

- Begins when program management begins to use the system to enable the evaluation and reporting related to specific program goals and outcomes.
- Continues until the site has developed the necessary assessments/reports and implemented the workflow required to support data collection and reporting of outcomes.

Indicator to exit Stage 4:

- The site has created the assessments necessary to track specific outcomes.
- The site has created custom reports that report this outcome data.

Benefits of completing Stage 4 include the fact that much the reporting of outcomes can be used to substantiate requests for funding and demonstrate program effectiveness.

Participating Agencies will receive support from RIHMIS staff to complete all stages. To ensure that all parties are comfortable with the process and progress for this stage, the Participating Agency and RIHMIS staff may meet again to assess if obstacles to progress exist.

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POLICY 35: STAGE 5: SHARING OF DATA ACROSS AGENCIES (OPTIONAL STAGE)

Stage 5 of implementation:

- Begins when a program/agency creates and signs the required interagency authorizations necessary to share data.
- Continues until the agencies and programs share data and enhance the delivery of services to clients while decreasing the duplication of client data within the system.

Indicators to exit Stage 5:

- The agencies have created and signed the authorization forms necessary to share information between them. (Interagency Data Sharing Agreement)
- Agency client consent forms have been signed and agency informs individual clients that data collected by one agency would be shared with another program or agency.
- Individual clients have agreed to the sharing of their information between agencies, and they have signed the necessary client consent forms.
- The system has been configured to allow the sharing of client data between specific agencies and/or programs.
- Client Release of Information transactions has been completed and data has been entered into the system that is shared between agencies and/or programs authorized to share such data.

Benefits of completing Stage 5 include the enhanced customer service and decreased duplication of effort and client data stored within the system.

Participating Agencies will receive support from RIHMIS staff to complete all stages, both required and optional. To ensure that all parties are comfortable with the process and progress for this stage, the Participating Agency and RIHMIS staff may meet again to assess if obstacles to progress exist.

ATTACHMENTS



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Rhode Island Homeless Management Information System

Partnership Agreement between

Rhode Island Housing and Mortgage Finance Corporation

And

This agreement is entered into on _____ (d/m/y) between Rhode Island Housing and Mortgage Finance Corporation hereafter known as the “Corporation” and

_____ (agency name), hereafter known as “Agency,”

regarding access and use of the Rhode Island Homeless Management System hereafter known as “RIHMIS”.

The RIHMIS is a shared homeless database that allows authorized personnel at RIHMIS Member Agencies throughout Rhode Island to share information on common clients. Goals of the RIHMIS include: ability to expedite client intake procedures, improved referral accuracy, increased case management and administrative tools, and the creation of a tool to follow demographic trends and service utilization patterns of families and individuals experiencing homelessness or those families and individuals on the verge of homelessness

The project is administered by the Rhode Island Coalition for the Homeless. Bowman Internet Systems houses the central server that hosts the RIHMIS and limits access to the database to Member Agencies participating in the project. The Corporation intends to protect the RIHMIS data to the utmost of its ability from accidental or intentional unauthorized modification, disclosure, or destruction, and the Corporation does this by utilizing a variety of methods to guard the data.

When used correctly and faithfully by all involved parties, the RIHMIS is designed to benefit multiple stakeholders, including the community, homeless service agencies, and the consumer of homeless services, through a more effective and efficient service delivery system.

I. Confidentiality

- A. The Agency will uphold relevant Federal and State confidentiality regulations and laws that protect client records, and the Agency will only release confidential client records with written consent by the client, or the client’s guardian, unless otherwise provided for in the regulations or laws. A client is anyone who receives services from the Agency and a guardian is one legally in charge of the affairs of a minor or of a person deemed incompetent.
 1. The Agency will abide specifically by Federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2, regarding disclosure of alcohol and/or drug abuse records. In general terms, the Federal regulation prohibits the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Agency understands that Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.

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2. The Agency will abide specifically with the Health Insurance Portability and Accountability Act of 1996 and corresponding regulations passed by the U.S. Department of Health and Human Services. In general, the regulations provide consumers with new rights to control the release of medical information, including advance consent for most disclosures of health information, the right to see a copy of health records, the right to request a correction to health records, the right to obtain documentation of disclosures of information may be used or disclosed. The current regulation provides protection for paper, oral, and electronic information.
 3. The Agency will abide specifically by Rhode Island State law, which in general terms requires an individual to be informed that any and all medical records she/he authorizes to be released, whether related to physical or mental health, may include information indicating the presence of a communicable or venereal disease. The Agency is required to inform the individual that these records may include, but are not limited to the inclusion of information on diseases such as hepatitis, syphilis, gonorrhea, tuberculosis, and HIV/AIDS.
 4. The Agency will abide specifically by Rhode Island law in that this law prohibits agencies from releasing any information that would identify a person as a client of a mental health facility, unless client consent is granted.
 5. The Agency will provide a verbal explanation of the RIHMIS and arrange for a qualified interpreter or translator in the event that an individual is not literate in English or has difficulty understanding the consent form(s).
 6. The Agency will not solicit or input information from clients into the RIHMIS unless it is essential to provide services or conduct evaluation or research.
 7. The Agency will not divulge any confidential information received from the RIHMIS to any organization or individual without proper written consent by the client unless otherwise permitted by relevant regulations or laws.
 8. The Agency will ensure that all persons who are issued a User Identification and Password to the RIHMIS within that particular agency abide by this Partnership Agreement, including the confidentiality rules and regulations. The Agency will ensure that each person granted RIHMIS access at the Agency receives an RIHMIS manual. This manual will include information on how to use the RIHMIS as well as basic steps to ensure confidentiality. The Agency will be responsible for managing any of its own requirements that individual employees comply with RIHMIS confidentiality practices, such as having employees sign a consent confidentiality practices form. It is understood that those granted Agency Administrator access within each RIHMIS agency must become a Certified RIHMIS Agency Administrator through training provided by RIHMIS.
 9. The Agency understands that the database server-which will contain all client information, including encrypted identifying client information-will be physically located in Shreveport Louisiana.
- B. The Agency agrees to maintain appropriate documentation of client consent or guardian-provided consent to participate in the RIHMIS
1. The Agency understands that informed client consent is required before any basic identifying client information is entered into the RIHMIS for the purposes of interagency sharing of information. Informed client consent will be documented by completion of the standard RIHMIS client Authorization to Release and Exchange Basic Information for the RIHMIS form.
 2. The Client Authorization form mentioned above, once completed, authorizes basic identifying client data to be entered into the RIHMIS, as well as non-confidential service transaction information. This authorization form permits basic client identifying information to be shared among all RIHMIS Member Agencies and non confidential service transactions with select RIHMIS Member Agencies based on relevance.
 3. If a client denies authorization to share basic identifying information and non-confidential service data via the RIHMIS, identifying information shall only be entered into the RIHMIS if the client information is locked and made accessible only to the entering agency program, therefore, precluding the ability to share information. If client refuses any entry of data, the RIHMIS will not be used as a resource for that individual client and her/his dependents. This does not override the local agencies policy and responsibilities for collecting data used to meet its funder's requirements.

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4. The Agency will incorporate an RIHMIS Clause into existing Agency Authorization for Release of Information form(s) if the Agency intends to input and share confidential client data with the RIHMIS. The Agency's modified Authorization for Release of Information form(s) will be used when offering a client the opportunity to input and share service information. The Agency will communicate to the client what information, beyond basic identifying data and non-confidential services will be shared if client consent is given. The Agency will communicate to the client that while the Agency can restrict information to be shared with select agencies, those other agencies will have access to the information and are expected to use the information professionally and to adhere to the terms of the RIHMIS Partnership Agreement. Agencies with whom information so shared are each responsible for obtaining appropriate consent before allowing further sharing of client records. The RIHMIS will conduct periodic audits to enforce informed consent standards, but the primary oversight of this function is between agencies.
 5. If a client denies authorization to have information beyond basic identifying data and beyond non-confidential service transactions both entered and shared among the RIHMIS, then this record must be locked and made available only to the entering agency program, therefore, precluding the ability to share information. If the client refuses any entry of data, the RIHMIS will not be used as a resource for that individual client and her/his dependents. This does not override the local agencies policy and responsibilities for collecting data used to meet its funder's requirements.
 6. The Agency agrees to place all Client Authorization for Release of Information forms related to the RIHMIS in a file to be located at the Agency's business address and that such forms are made available to the Corporation for periodic audits. The Agency will retain these RIHMIS related Authorization for Release of Information forms for a period of 5 years, after which time the forms will be discarded in a manner that ensures client confidentiality is not compromised.
 7. The Agency understands that in order to update, edit, or print a client's record, the Agency must have on file a current authorization from the client as evidenced by a completed standard RIHMIS Authorization to Release form pertaining to basic identifying data, and/or a modified Agency form with a RIHMIS clause pertaining to confidential information.
 8. The Agency understands the Corporation does not require or imply that service be contingent upon a client's participation in the RIHMIS
- C. The Agency and RI Coalition for the Homeless understand the RIHMIS Project, and the RI Coalition as administrator, are custodians of data and not owners of data.
1. In the event the RIHMIS Project ceases to exist, Member Agencies will be notified and provided reasonable time to access and save client data on those served by the agency as well as statistical and frequency data from the entire system. Then, the information collected by the centralized server, located in Shreveport Louisiana will be purged or stored. If the later occurs, the data will remain in an encrypted and aggregate state.
 2. In the event the RIHMIS ceases to exist, the custodianship of the data will be transferred to another non-profit for administration, and all RIHMIS Member Agencies will be informed in a timely manner.

II. Data Entry and/or Regular Use

- A. User identification and passwords are not permitted to be shared among users.
- B. If an Agency has access to a client's basic identifying information, non-confidential service transactions, and confidential information and services records, it will be generally understood that a client gave consent for such access. However, before an agency can update, edit, or print such information, it must have informed client consent, evidenced by a current standard RIHMIS Authorization to Release form in writing pertaining to basic identifying data and/or an Agency-modified form with the RIHMIS pertaining to confidential information.

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- C. If a client has previously given permission to multiple agencies to have access to her/his information, beyond basic identifying information and non-confidential service transactions, and then chooses to eliminate one or more of these agencies, the Agency at which such desire is expressed will contact its partner agency/agencies with whom the client previously granted permission for information exchange and the Systems Administrator and explain that the record, or portions of the record, will no longer be shared at the client's request. The agency where the request is made or Systems Administrator will then either close the entire record, or simply lock out portions of the record to the other agency or agencies.
- D. In the event that a client would like to rescind consent to participate in the RIHMIS completely, the agency at which her/his desire is expressed, will work with the client to complete a brief form, which will be sent to the System Administrator to inactivate the client.
- E. The Agency will only enter individuals in the RIHMIS that exist as clients under the Agency's jurisdiction.
- F. The Agency will not misrepresent its client base in the RIHMIS by entering known, inaccurate information (i.e., Agency will not purposefully enter inaccurate information on a new record or to override information entered by another agency).
- G. The Agency will consistently enter information into the RIHMIS and will strive for real-time, or close to real-time, data entry.
- H. The Agency understands that with a current standard RIHMIS Authorization for Release form on file, it can update, edit, and print a client's basic identifying information.
- I. The Agency understands that a modified agency Authorization to Release Information form, with the added RIHMIS Clause, permits it to share confidential client information with select agencies.
- J. The Agency understands that assessment screens are only allowed to be edited by the individual that originally enters the data, whether that individual is employed by the Agency or another Member Agency. The Agency will create a separate assessment, as needed, to indicate a change in a client's status, updates, and to edit incorrect information.
- K. Discriminatory comments based on race, color, religion, national origin, ancestry, handicap, age, sex and sexual orientation are not permitted in the RIHMIS.
- L. Offensive language and profanity are not permitted in the RIHMIS.
- M. The Agency will utilize the RIHMIS for business purposes only.
- N. The Agency understands the RIHMIS will provide initial training and periodic updates to that training to assigned Agency Staff about the use of the RIHMIS; this information is then to be communicated to other RIHMIS Staff within the Agency.
- O. The Agency understands the RIHMIS will be available for Technical Assistance within reason (i.e., troubleshooting and report generation). Standard operating hours in which TA will generally be available are 8:30 a.m. – 4:30 p.m. on Monday through Friday.
- P. The Agency will keep updated virus protection software, firewall software and standard operating system critical security updates on Agency computers that access the RIHMIS.
- Q. Transmission of material in violation of any United States Federal or State regulations is prohibited and includes, but is not limited to: copyrighted material, material legally judged to be threatening or obscene and material considered protected by trade secret.
- R. The Agency will not use the RIHMIS with intent to defraud the Federal, State, or local government, or an individual entity, or to conduct any illegal activity.
- S. The Agency recognizes the RIHMIS Steering Committee to be the discussion center regarding the RIHMIS, including RIHMIS process updates, policy and practice guidelines and data analysis. The Agency will designate an assigned RIHMIS Staff member to attend RIHMIS meetings regularly, and understands that the Steering Committee will continue to be responsible for coordinating RIHMIS activities.

III. Reports

- A. The Agency understands that it will retain access to all identifying and statistical data on the clients it serves.

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- B. The Agency understands that access to data on those it does not serve will be limited to basic identifying information and non-confidential service data. Therefore, the Agency understands that, with exceptions, a list of all persons in the RIHMIS along with basic identifying information and non-confidential service data can be generated. (Exceptions are Locked records).
- C. Reports obtaining information beyond basic identifying data and non-confidential services on individuals not served by the Agency are limited to statistical and frequency reports, which do not disclose identifying information.
- D. The Agency understands that before non-identifying system wide aggregate information collected by the RIHMIS is disseminated to non-RIHMIS Member Agencies, including funders, it shall be endorsed by the RIHMIS Steering Committee and/or the Corporation. (The RIHMIS Steering Committee will serve in part to protect the confidentiality of clients and the integrity of the data by requiring certain methods of data analysis be utilized).

IV. Proprietary Rights of ServicePoint and Database Integrity

The Agency will not give or share assigned user identification and passwords to access the RIHMIS with any other organization, governmental entity, business, or individual that has not signed the Rhode Island Homeless Management Information System Partnership Agreement.

- A. Rhode Island Housing and Mortgage Finance Corporation Partnership agreement.
- B. The Agency will not cause corruption of the RIHMIS in any manner or way. Any unauthorized access or unauthorized modification to computer system information or interference with normal system operations on any ServicePoint computer system or network accessed by RIHMIS participants will result in immediate suspension of services and the Housing Resource Corporation and/or ServicePoint will pursue all appropriate legal actions.

V. Hold Harmless

- A. The RIHMIS makes no warranties, expressed or implied. The Agency, at all times, will indemnify and hold the Corporation and its Agents (Rhode Island Housing and Mortgage Finance Corporation and the Rhode Island Coalition for the Homeless) from any damages, liabilities, claims, and expenses that may be claimed against the Agency; or for injuries or damages to the Agency or another party arising from participation in the RIHMIS; or arising from any acts, omissions, neglect, or fault of the Agency or its agents, employees, licensees, or clients; or arising from the Agency's failure to comply with laws, statutes, ordinances, or regulations applicable to it or the conduct of its business. The Agency will also hold the Corporation and its Agents harmless for negative repercussions resulting in the loss of data due to delays, non-deliveries, mis-deliveries, or service interruption cause by the Agency's or another Member Agency's negligence or errors or omissions, as well as natural disasters, technological difficulties, and/or acts of God. The Corporation and its Agents shall not be liable to the Agency for damages, losses or injuries to the Agency or another party other than if such is the result of gross negligence or willful misconduct of the Corporation or its Agents.
- B. The Agency agrees to keep in force a comprehensive general liability insurance policy with combined single limit coverage. Said insurance policy shall include coverage of Agency's indemnification obligations under this agreement.

VI. Terms and Conditions

- A. The parties hereto agree that this agreement is the complete and exclusive statement of the agreement between parties and supersedes all prior proposals and understandings, oral and written, relating to the subject matter of this agreement.
- B. Neither party shall transfer or assign any rights or obligations without the written consent of the other party.
- C. This agreement shall remain in force until revoked in writing by either party, with 30 days advance written notice. The exception to this term is if allegations or actual incidences arise regarding possible or actual breeches of this agreement. Should such situations arise, the Corporation may immediately suspend access to the RIHMIS until the allegations are resolved in order to protect the integrity of the system.
- D. This agreement may be modified or amended by written agreement executed by both parties with 30 days advance written notice.

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Use of the RIHMIS constitutes acceptance of these Terms and Conditions.

Executive Director's Signature
Name and Address of Agency:

Date (d/m/y)

Executive Director Printed Name

Date (d/m/y)

Jim Ryczek

Executive Director
Rhode Island Coalition for the Homeless
160 Broad Street
Providence, RI 02903

Date (d/m/y)

Richard H. Godfrey, Jr.

Executive Director
Rhode Island Housing and Mortgage Finance Corporation
44 Washington Street
Providence, RI 02903

Date (d/m/y)

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RHODE ISLAND HMIS END USER AGREEMENT

Fill in Agency Name: _____

Print Your Name: _____

This agency recognizes the privacy of client needs in the design and management of the Homeless Management Information System (HMIS). These needs include both the need continually to improve the quality of homeless and housing services with the goal of eliminating homelessness in our community, and the need to vigilantly maintain client confidentiality, treating the personal data of our most vulnerable populations with respect and care.

As the guardians entrusted with this personal data, HMIS users have a moral and a legal obligation to ensure that the data they collect is being collected, accessed and used appropriately. It is also the responsibility of each user to ensure that client data is only used to the ends to which it was collected, ends that have been made explicit to clients and are consistent with the mission to assist families and individuals in our community to resolve their housing crisis. Proper user training, adherence to the HMIS Policies and Procedures Manual, and a clear understanding of client confidentiality are vital to achieving these goals.

By executing this agreement you agree to abide by the following client confidentiality provisions:

1. A Client Consent for Data Collection Form must be signed by each client whose data is to be entered into the HMIS.
2. Personal User Identification and Passwords must be kept secure and are not to be shared.
3. Client consent may be revoked by that client at any time through a written notice.
4. No client may be denied services for failure to provide consent for HMIS data collection.
5. Only general, non-confidential information is to be entered in the "other notes/comments" section of the Client Profile on the HMIS. Confidential information, including TB diagnosis, domestic violence and mental and/or physical health information, is not permitted to be entered in this section.
6. Clients have a right to inspect, copy, and request changes in their HMIS records.
7. HMIS Users may not share client data with individuals or agencies that have not entered into an HMIS Agency Agreement with this Agency without obtaining written permission from that client.
8. Discriminatory comments based on race, color, religion, national origin, ancestry, handicap, age, sex and sexual orientation are not permitted in the HMIS. Profanity and offensive language are not permitted in the HMIS.
9. HMIS Users will maintain HMIS data in such a way as to protect against revealing the identity of clients to unauthorized agencies, individuals or entities.
10. Any HMIS User found to be in violation of the HMIS Policies and Procedures, or the points of client confidentiality in this User Agreement, may be denied access to the HMIS.

I affirm the following:

1. I have received training in how to use the HMIS.
2. I have read and will abide by all policies and procedures in the HMIS Policies and Procedures Manual
3. I will maintain the confidentiality of client data in the HMIS as outlined above and in the HMIS Policies and Procedures Manual
4. I will only collect, enter and extract data in the HMIS relevant to the delivery of services to people experiencing a housing crisis in our community.

Your signature below indicates your agreement to comply with this statement of confidentiality. There is no expiration date of this agreement.

User's Signature

Date

Witness Signature

Date

Title

Date

Executive Director's Signature

Date

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RIHMIS

Interagency Data Sharing Agreement

The RIHMIS is a computerized record keeping system that captures information about people experiencing homelessness that is administered by the Rhode Island Coalition for the Homeless. In addition to creating an unduplicated count of the homeless population and developing aggregate information that will assist in developing policies to end homelessness, the system allows programs if they agree, to share information electronically about clients, including their service needs, who have been entered into the software, in order to better coordinate services. Client level information can only be shared between agencies that have established an Interagency Data Sharing Agreement and have received written consent from particular clients agreeing to share their personal information with another agency. The agency receiving the written consent has the ability to “share” that client’s information electronically through the system with a collaborating agency.

This process can benefit clients by eliminating duplicate intakes. Intake and exit interviews can be shared, with written consent, between collaborating agencies. By establishing this agreement, the collaborating agencies agree that within the confines of the RIHMIS and the software:

1. RIHMIS information in either paper or electronic form will never be shared outside of the originating agency without client written consent.
2. Client level information will only be shared electronically through the RIHMIS with agencies the client has authorized to see their information.
3. Information that is shared with written consent will not be used to harm or deny any services to a client.
4. A violation of the above will result in immediate disciplinary action.
5. Information will be deleted from the system upon client request.
6. Clients have the right to request information about who has viewed or updated their RIHMIS record.
7. In transmitting, receiving, storing, processing or otherwise dealing with any consumer protected information, they are fully bound by state and federal regulations governing confidentiality of patient records, including, but not limited to, the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 (‘HIPAA’, 45 CFR, Parts 160 & 164), and cannot use or disclose the information except as permitted or required by this agreement or by law.
8. Agencies agree to notify each of the other collaborating agencies, within one business day, of any breach, use, or disclosure of the protected information not provided for by this agreement.
9. Agencies agree to notify each of the other collaborating agencies of their intent to terminate their participation in this agreement.
10. Agencies agree to resist, through judicial proceedings, any judicial or quasi-judicial effort to obtain access to protected information pertaining to consumers, unless expressly provided for in state and/or federal regulations

We establish this interagency sharing agreement so that our agencies will have the ability to share client level information electronically through the RIHMIS. This agreement does not pertain to client level information that has not been entered into the RIHMIS. This electronic sharing capability provides us with a tool to share client level information. This tool will only be used when a client provides written consent to have his/her information shared. Collaborating agencies also have a Partnership Agreement with the RI COALITION FOR THE HOMELESS-HMIS project and have completed security procedures regarding the protection and sharing of client data.

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By signing this form, on behalf of our agencies, we authorize the RI COALITION FOR THE HOMELESS-RIHMIS to allow us to share information between our agencies. We agree to follow all of the above policies to share information between our collaborating agencies. **The signatures below constitute our acceptance of the “Interagency Data Sharing Agreement”**

1. **Agency:** _____

Address: _____

Name & Title of Authorized Signature:

Signature

Date

2. **Agency:** _____

Address: _____

Name & Title of Authorized Signature:

Signature

Date

3. **Agency:** _____

Address: _____

Name & Title of Authorized Signature:

Signature

Date

Rhode Island HMIS Policies and Procedures Handbook

AGENCY NAME

CLIENT HMIS ORAL INFORMATION SCRIPT FORM

- The Homeless Management Information System (HMIS) is a computerized record-keeping system that captures information about people experiencing homelessness, including their service needs. AGENCY NAME has decided to use the HMIS as its data management tool.
- We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law, or by organizations that give us money to operate our programs.
- Other personal information we collect is important to run our programs. It also helps us to better understand the needs of persons who are homeless and to improve services for them.
- Your participation in this program is voluntary. If you choose not to participate, that will in no way affect the services you receive.
- The HMIS is beneficial to you because you will not have to supply all your personal information again when you go to another agency for services. With your written consent, we can share your personal information with another collaborating agency.
- You can choose to share all or part of your personal information, including: demographic, housing, employment, military, legal, service needs, goals, and outcomes
- No medical, mental health or substance abuse history will be shared unless you provide express written consent.
- With your written consent, your information will be shared electronically via a secure, encrypted, web-based system with the agencies of your choice.
- The information you share with another agency will be used to access services for you. Your written consent to share information is effective for the period of time designated.
- You can choose to have any information you have shared deleted from the system at any time. You can also ask to see a document which lists the persons who have viewed or updated your client record.
- You can have any written consent revoked at any time.
- For the purposes of reporting requirements and advocacy, your information will be used without revealing your name or other information which would identify you.
- AGENCY NAME has an interagency agreement with other agencies regarding shared clients. All agencies using HMIS are required to have security procedures in place regarding the protection and sharing of client data.

Rhode Island HMIS Policies and Procedures Handbook

CLIENT CONSENT RI HMIS DATA COLLECTION (Green)

This client notice and consent describes how information about you may be used and disclosed and how you can get access to this information. Please review it carefully. **If you have any questions or desire any further information regarding this form please contact** Donald Larsen at 421-6458. Participation in data collection, although optional, is a critical component of the community's ability to provide the most effective services and housing possible. ***Please understand that access to shelter and housing services is available without participation in data collection.***

I, _____ (print client's name), understand and acknowledge that

_____ (the "Agency") is affiliated with the Homeless Management Information System (HMIS), and I consent to and authorize the collection of information and preparation of records pertaining to the services provided to me by the Agency. The information gathered and prepared by the Agency will be included in a HMIS database of collaborating agencies (list available), and **only to collaborating agencies**, who have entered into an HMIS Agency Participation Agreement and shall be used to:

- a) Produce a client profile at intake that will be shared by collaborating agencies
- b) Produce anonymous, aggregate-level reports regarding use of services
- c) Track individual program-level outcomes
- d) Identify unfilled service needs and plan for the provision of new services
- e) Allocate resources among agencies engaged in the provision of services
- f) Provide individual case management

- | | |
|--------------------------|--------------------------------------|
| • Name | • Residence Prior to Program Entry |
| • Date of Birth | • Zip Code of Last Permanent Address |
| • Social Security Number | • Family Composition |
| • Gender | • Employment Status |
| • Ethnicity and Race | • Veteran Status |
| • Program Entry Date | • Disabling Condition |
| • Program Exit Date | • HUD APR |
| • Food & Shelter Report | |

I understand that I have the right to inspect, copy, and request all HMIS records maintained by the Agency relating to the provision of services to me and to receive a paper copy of this form.

I understand that this release can be revoked by me at any time and that the revocation must be signed and dated by me. I further understand that this consent is subject to revocation at any time, except to the extent that the Agency has already taken action in reliance on it. If not previously revoked, this consent terminates automatically 1 year after my last treatment or discharge from Agency. I understand that my records are protected by federal, state, and local regulations governing confidentiality of client records and cannot be disclosed without my written consent unless otherwise provided for in the regulations.

Additionally, I understand that participation in data collection is optional, and I am able to access shelter and housing services if I choose not to participate in data collection. * This does not override this agency's active policies or intake procedures.

Date: _____

(Signature)

Witness: _____
Position Name

Rhode Island HMIS Policies and Procedures Handbook

CLIENT CONSENT RI HMIS DATA COLLECTION (Yellow)

This client notice and consent describes how information about you may be used and disclosed and how you can get access to this information. Please review it carefully. **If you have any questions or desire any further information regarding this form please contact** Donald Larsen at 421-6458.

Participation in data collection, although optional, is a critical component of the community’s ability to provide the most effective services and housing possible. ***Please understand that access to shelter and housing services is available without participation in data collection.***

I, _____(print client’s name), understand and acknowledge that

_____ (the “Agency”) is affiliated with the Homeless Management Information System (HMIS), and I consent to and authorize the collection of information and preparation of records pertaining to the services provided to me by the Agency. The information gathered and prepared by the Agency will be included in a HMIS database that have entered into an HMIS Agency Participation Agreement and shall be used by the Agency to:

- a) Produce a client profile at intake
- b) Produce anonymous, aggregate-level reports regarding use of services
- c) Track individual program-level outcomes
- d) Identify unfilled service needs and plan for the provision of new services
- e) Allocate resources among agencies engaged in the provision of services
- f) Provide individual case management

- | | |
|---|---|
| <ul style="list-style-type: none"> • Name • Date of Birth • Social Security Number • Gender • Ethnicity and Race • Program Entry Date • Program Exit Date • Food & Shelter Board Report | <ul style="list-style-type: none"> • Residence Prior to Program Entry • Zip Code of Last Permanent Address • Family Composition • Employment Status • Veteran Status • Disabling Condition • HUD APR |
|---|---|

I understand that I have the right to inspect, copy, and request all HMIS records maintained by HMIS the Agency relation to the provision of services to me and to receive a paper copy of this form.

I understand that this release can be revoked by me at any time and that the revocation must be signed and dated by me. I further understand that this consent is subject to revocation at any time, except to the extent that the Agency has already taken action in reliance on it. If not previously revoked, this consent terminates automatically 1 year after my last treatment or discharge from the Agency. I understand that my records are protected by federal, state, and local regulations governing confidentiality of client records and cannot be disclosed without my written consent unless other wise provided for in the regulations.

Additionally, I understand that participation in data collection is optional, and I am able to access shelter and housing services if I choose not to participate in data collection. * This does not override this agency’s active polices or intake procedures.

Date: _____ (Signature)

Witness: _____ Position Name

FACT Sheet: RI Homeless Management Information System (HMIS)

We will enter information you provide to us into a computer program called ServicePoint. We are doing this for several reasons:

- To find out what we need to end homelessness in Rhode Island;
- To provide better service;
- To receive federal funds.

IMPORTANT POINTS ABOUT HOW YOUR INFORMATION WILL BE USED

- We will use ServicePoint to keep a record of your contact with our agency.
- We will not share **any** information **without your written permission** through a signed client consent form that allows us to share client profile information with collaborating agencies. This means that you will not have to provide the same information at more than one intake.

HOW WILL MY INFORMATION BE KEPT SECURE?

We have done several things to make sure that your information is kept safe and secure:

- The computer program we use has the highest security protection available;
- Any information that could identify you, like your name, SS# or birth-date, will be viewed only by people working to provide services to you, and will be removed before reports are issued to local, state, or national agencies;
- All employees agree to follow privacy rules before using the system.

KNOW YOUR RIGHTS

You have the following rights:

- To see a report of your records within 48 hours.
- To have your record changed so that information is up-to-date and correct.
- To refuse consent and still receive services.
- To file a complaint about how the system was used.

To file a complaint, write to: HMIS Steering Committee, Attn: Don Larsen at the RI Coalition for the Homeless at (401) 421-6458.

Rhode Island Homeless Management Information System Flow Chart

Log on to <https://rihmis.servicept.com>
Place in Favorites. Enter your username and password. You must have had a certificate install by the HMIS Systems Administrator to access this site.

Click on the tab labeled ClientPoint. This will bring up the general client profile screen. Enter client information in spaces provided. Don't ever check off "Exact Match" or click on "Add as Anonymous Client".

The program will search the database and if the client is already in the database a blue link will appear in the top left-hand corner. At this point *do not* click on "Add this Client to the Database". [Click on the blue link](#) (client name) and this will bring you to the Client Profile screen that contains the Food and Shelter Board Report, a place to Add Clients to Household (called a sub-assessment) and the orange Entry/Exit button for the HUD APR.

If there is no blue link on the top of the screen it will say; "No Matching Clients Found". Enter client information in spaces provided. Remember, don't check off "Exact Match" or click on "Add as Anonymous Client". Click on "Add/Find Client." A pop up window will appear; click on OK. You are now in the Client Profile screen that contains the Food and Shelter Board Report, a place to Add Client to Household (called a sub-assessment) and the orange Entry/Exit button for the HUD APR.

Rhode Island HMIS Policies and Procedures Handbook

If you are not entering the information on the same day as client entry, you must Back Date to the entry date your guest entered the program. Go to the Assessment Date located under the Food & Shelter Board heading, set the date and time then click on the Back Date button. You must enter the date the person entered your shelter program. This will effect all entry/exit dates but has no effect on goals and service transactions.

Now you need to "Add this Client to a Household". The first person is automatically put in after you answer the questions so you would then enter the spouse, then fill out the questions and continue by entering the children. There are two pop-ups for this section. The first adds the client to the database and the second gives information on the type of household.

The next step is to fill in the Release of Information by either clicking on the red "None" or by Clicking on the orange ROI button. Answer the questions presented and exit. Please remember to answer as many questions as possible as this will provide you with the information you need for completing reports.

Then you would click on the orange Entry/Exit Button and this would bring up your HUD Annual Progress Report. Remember to fill out the sub-assessments by clicking on the "Gray Add buttons". They are; Disabilities, Work History and Income. If, for instance, the person is not working you can skip that particular sub-assessment.

It is very important to go into the drop-down menu called "Type" and click on HUD 40118. Be sure to "Exit" the client when they leave the shelter. You will need to go back into "Entry/Exit" to do this. Click on the edit pencil for Exit Date. This will give you accurate data for your Annual Progress Report.

Rhode Island HMIS Policies and Procedures Handbook

Then you go back to the Food and Shelter Board Report and fill in the required information. Remember to do the Entry/Exit for the Food and Shelter Board report by clicking on the “Gray Add” button on the right-hand side.

Fill out the “Food and Shelter Board Report” for every homeless person. Data for children is entered by filling out the first ten questions in the “Food and Shelter Board Report.” Children should have been entered as members of the household already. Just enter their last name and hit add/find client. They should show up as [a blue link](#) on the top of the page. Don’t forget to put the information in the “Entry/Exit” sub-assessment just above the first question of the Food and Shelter Board report. Click on the “Add” button on the right. The Start Date is the day the guest entered your shelter and the End Date is the date they left your shelter.

The next step is filling out case management information. This is important because this is how you will get reports on needs, services, and referrals provided. Here you can also enter case notes etc. In the grey area below the green tabs you will see “Case Plans” and “Service Transactions”. When you enter Case Plans you will be asked to fill out goals for your client, this begins the process of filling out 5 (buttons) sections. Three buttons in Case Plans and two in Service Transactions

They are 1) Add Case Notes 2) Add Action Step 3) Add Need /Service. After you save this page you will automatically go to Service Transactions and there are two buttons there. 1) Add Services and 2) Add Referrals. You must add service in the “Service Transactions” section.

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Every shelter should update its bedlist daily by assigning or removing clients from the bedlist. This will keep bed-night counts accurate for all reports. If you know a client is going to stay for a while “confirm next day stay”. You can use the “update bedlist” button on the bottom of the page, just check off anyone who is going to stay. The bedlist is accessed through the “Shelter Point” tab.

Don't forget to save every screen after making changes!

Thanks again for your patience and cooperation. As always, Don and Bob are available to troubleshoot and answer questions. He may be reached at the Coalition at 421-6458 or if he is not in the office, try his cell phone (862-9382) between 8:30am and 4:30pm. Please keep us posted about your experiences with HMIS and pass along any suggestions.

As a quick review:

Remember to enable the "Release of Information" after adding family to household by clicking on the red "none" on the top of the screen or by clicking on the orange ROI button. This must be done in order for security settings to take effect. Please fill out the HUD information before the Food and Shelter Board Report. Steps to take would be; 1. Add/Find Client, 2. (Back Date first if necessary), 3. Add Client to Household, 4. Release of Information, 5. Orange Entry/Exit button for HUD APR, 6. Food and Shelter Board Report-please don't forget the Entry/Exit "Add" button for the Food and Shelter Board Report, 7. Case Plans, 8. Service Transactions, Case Plans have 5 steps; a) case notes, b) action steps, c) services/needs, (service transactions) d) add service, e)referral. You must select HUD 40118 as "Type" in order for clients to be counted in your HUD APR. You must also select service transactions and choose a Need/Service (you must also “Add Service” in order for needs/services to be recorded, and you must Exit the person - you will see an exit date by clicking on the Exit edit pencil when you go into the HUD report through the Orange Entry/Exit button on the top right-hand corner! Don't forget to update your bed list!

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Agency Provider Numbers

80 Advent House	28 South County Community Action
90 Amos House	47 SStar of Rhode Island
11 Child and Family Services of Newport	73 Urban League Chester
12 Cranston CAP	24 Vietnam Era Veterans Action Center
33 Family Resources Community Action	30 Warwick House of Hope
29 House of Compassion	25 Welcome House of South County
45 Lucy's Hearth	21 Westbay Community Action Inc
35 MAP	27 Westerly Area Rest and Meals, Inc
95 McKinney Cooperative	31 Project Hope
92 Access RI	22 RI Coalition for the Homeless
50 New Hope Shelter of Pawtucket	15 Safe Havens
93 Nickerson Community Center	14 Crossroads N. Kingstown
74 Operation Stand Down	56 Crossroads Family Shelter
18 People to End Homelessness	94 Crossroads Medical
67 ProCap Interim House	75 208 Shelter Urban League
19 Providence Center	51 Crossroads Youth
96 Harrington Hall	52 Crossroads overnight
97 Rhode Island Family Shelter	81 MHA – EFS
16 East Bay	23 Riverwood
53 Harold Lewis House	57 Crossroads Case Management

Rhode Island HMIS Policies and Procedures Handbook

FOOD AND SHELTER BOARD REPORT (page 1 of 2)

1. Date of Admission _____ Date of Exit _____ 2. Client ID No. _____

3. Name _____ 4. Date of Birth _____ Age _____

5. SS# _____ 6. Gender _____

7. Race _____ 8. Ethnicity _____

9. Primary Language Spoken: _____ 10. City/Town of Last Residence: _____

11. Number of Months Since Last Permanent Residence: _____

12. How Long has Person Been Homeless? (In Months) _____

13. Immediate Past Place of Stay: 14. Why is Shelter Needed? (Primary Reason)

- Hotel/Motel
- Apartment/Home
- Shelter
- Medical Hospital
- Psychiatric Hospital
- Correctional Facility
- Family or Friends
- Street/Car
- Drug Treatment or
- Detox Facility
- Other _____

- No Income
- Housing Costs
- Landlord/Tenant Dispute
- Natural Disaster (e.g. fire)
- Domestic Violence
- Legal Eviction
- Utilities Shut Off
- Family Separation
- Relocation From Outside RI
- Foreclosure
- Other _____

15. Why is Shelter Needed? (Secondary Reason)

- No Income
- Housing Costs
- Landlord/Tenant Dispute
- Natural Disaster (e.g. fire)
- Domestic Violence
- Legal Eviction
- Utilities Shut Off
- Family Separation
- Relocation From Outside RI
- Other _____

16. Problems Experienced In Past Six Months:

	Yes	No
Domestic Violence	<input type="radio"/>	<input type="radio"/>
Medical Problems	<input type="radio"/>	<input type="radio"/>
Sexual Abuse	<input type="radio"/>	<input type="radio"/>
Family Separation	<input type="radio"/>	<input type="radio"/>
Loss Of Income	<input type="radio"/>	<input type="radio"/>
Mental Health Problems	<input type="radio"/>	<input type="radio"/>
Youth/Family Dispute	<input type="radio"/>	<input type="radio"/>
Alcohol Problems	<input type="radio"/>	<input type="radio"/>
Drug Problems	<input type="radio"/>	<input type="radio"/>
Incarceration	<input type="radio"/>	<input type="radio"/>
Both Alcohol and Drug	<input type="radio"/>	<input type="radio"/>

17. Client Presentation:

- Single Adult
- Family
- Other _____

18. If Family, How Many Children are Being Served? _____

19. If Family, Single-Parent Household? Yes No

20. Head-of-Household is Mother Father

21. Is Client Involved with DCYF? Yes No

22. Does Client Receive FIP at Present? Yes No

23. Has Client Received FIP in Past Six Months? Yes No

Rhode Island HMIS Policies and Procedures Handbook

FOOD AND SHELTER BOARD REPORT (page 2 of 2)

24. Does Client Receive SSI at Present? Yes No
25. Has Client Received SSI in Past Six Months? Yes No
26. Other Sources of Income at Present:
- Employment
 - Bridge/GPA
 - Disability/TDI
 - Pension
 - Unemployment Benefits
 - VA Benefits
 - Alimony/Child Support
 - None
27. Other Sources of Income in Past Six Months:
- Employment
 - Bridge/GPA
 - Disability/TDI
 - Pension
 - Unemployment Benefits
 - VA Benefits
 - Alimony/Child Support
 - None
28. Has Person Lost Income in the Past Six Months? Yes No
29. If So, What Income was Lost in the Past Six Months?
- SSI/SSDI
 - Bridge/GPA
 - Alimony/Child Support
 - FIP
 - VA Benefits
 - Pension
 - Unemployment Benefits
 - Disability/TDI
 - Employment
30. Annual Income in Past Twelve Months:
- Under \$5,000
 - \$5,000-\$9,999
 - \$10,000-\$14,999
 - \$15,000-\$19,999
 - \$20,000 and over
31. Employment Status:
- Employed
 - Unemployed, actively seeking employment
 - Unemployed, not actively seeking employment
32. If Employed, For How Long?
- Less than 6 months
 - 6-11 months
 - 13-23 months
 - 2-5 years
 - Over 5 years
 - Not Applicable
33. If Employed, How Many Hours?
- 35 Hours or More Weekly
 - Less Than 35 Hours Weekly
 - Not Applicable
34. If Unemployed, For How Long?
- Less than 6 months
 - 6-11 months
 - 13-23 months
 - 2-5 years
 - Over 5 years
 - Not Applicable
35. Education: Highest Grade Completed _____
36. Type of Education:
- GED Certificate
 - High School Graduate
 - Tech./Trade School
 - Some College or University
 - College or University Graduate
 - Post College Graduate
 - None of the Above
37. Military Service Veteran? Yes No

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HUD HMIS Data and Technical Standards FR-4848-N-02

Universal Data Elements

1. Name
2. Social Security Number
3. Date of Birth
4. Ethnicity and Race
5. Gender
6. Veterans Status
7. Disabling Condition
8. Residence Prior to Program Entry
9. Zip Code of Last Permanent Address
10. Program Entry Date
11. Program Exit Date

These are provided through ServicePoint

12. Person ID Number
13. Program ID Number
14. Household ID Number

Program-Specific Data Elements

1. Income and Sources
2. Non-Cash Benefits
3. Physical Disability
4. Developmental Disability
5. HIV/AIDS
6. Mental Health
7. Substance Abuse
8. Domestic Violence
9. Services Received
10. Destination
11. Reasons for Leaving

Data Elements that may be added to the HUD APR in the future (Not Mandatory)

12. Employment
13. Education
14. General Health Status
15. Pregnancy Status
16. Veteran's Information
17. Children's Education

Steps for Completing ServicePoint

1. Add Client to the Database
2. Backdate if Needed
3. Add Client to the Household (Families only)
4. Fill out Release of Information
5. Fill out HUD Report (orange entry/exit)
6. Fill out Food and Shelter Board Report (Remember the Add button for Sub-assessment)
7. Add Goals and Service Transactions and add Services
8. Record Referrals

Programs that Require Program-Specific Data Elements

HUD's supportive Housing Program, Shelter Plus Care, Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program, and homeless programs funded through Housing Opportunities for Persons with AIDS (HOPWA), ESG.

**** You must also fill in the HUD information for each child!**

Entry/Exit

* It is extremely important that each client is exited from your programs when they are no longer receiving services. You must also have end dates for services that you provide.

Rhode Island HMIS Policies and Procedures Handbook

HUD Entry/Exit Form (page 1 of 2)

PRINT NAME: _____

Social Security _____ - _____ - _____ **Date of Birth** ____/____/____

Gender Male Female

Ethnicity Hispanic Non-Hispanic

Race Asian African American Native American/Alaskan Native Pacific Islander White Other Multi Racial

Marital Status Single/No children Single Head of Household Two parent household Married Divorced

Program ENTRY DATE ____/____/____ **Program EXIT DATE** ____/____/____

Is Client Homeless? Yes No **Is client chronically homeless?** Yes No

Place living one week prior to program entry:

Domestic Violence situation	Living with Family (HUD)	Place not meant for habitation (HUD)
Don't Know (HUD)	Living with Friends (HUD)	Psychiatric Hospital or Facility (HUD)
Emergency Shelter (HUD)	Nursing Home (HUD)	Refused (HUD)
Foster care/group home (HUD)	On the street (HUD)	Rental House Apartment (HUD)
Hospital (HUD)	Other (HUD)	Subsidized Housing (HUD)
Hotel/Motel without emergency shelter (HUD)	Own House/Apartment (HUD)	Substance Abuse Treatment Center (HUD)
Jail, Prison or Juvenile Facility (HUD)	Permanent Housing for Formerly Homeless (HUD)	Transitional Housing for Homeless (HUD)

Shelter name if coming from another shelter _____

Length of stay at place prior to program entry:

One week or less (HUD)	More than three months, but less than one year (HUD)
More than one week, but less than one month (HUD)	One year or longer (HUD)
One to three months (HUD)	

Extent of homelessness: First time homeless

1-2 times in the past	Long term: 2 years of more
Chronic:/4times in past 3 years	

Date of present homelessness ____/____/____

Homeless verification on file: Formal eviction documentation

Signed client statement with confirmation statement	Verification from outreach worker (for on the street)
Verification from an institution	Verification from referring agency/shelter

Homelessness primary and secondary reason (Place a 1 and 2 next to the appropriate item):

Addiction	Family/personal illness	Other
Divorce	Jail/prison	Physical/mental disabilities
Domestic Violence	Moved to seek work	Unable to pay rent/mortgage
Evicted within past week	Natural disaster Evacuee	Unemployment

Actual or pending eviction Yes No **If yes, date of eviction** ____/____/____

Institutional living prior to 18 year of age (Foster Care) Yes No

Zip code of last permanent address _____

Zip data quality: Full zip code recorded Don't know Refused

Domestic violence victim Yes No

Extent of domestic violence:

Within the past three months (HUD)	More than a year ago (HUD)
Three to six months ago (HUD)	Don't know (HUD)
From six to twelve months ago (HUD)	Refused (HUD)

Disability Type: *These two questions can only be asked after client is accepted into the program!

Alcohol Abuse (HUD)	Mental Illness (HUD)	Vision Impaired
Developmental (HUD)	Physical/mobility limits (HUD)	Dual diagnosis
Drug Abuse (HUD)	HIV/AIDS (HUD)	Other
Physical/medical (HUD)	Hearing Impaired	

Rhode Island HMIS Policies and Procedures Handbook

HUD Entry/Exit Form (page 2 of 2)

* Do you have a disability of long duration? Yes No Don't know Refused

Health condition compared to people of your age:

Excellent (HUD)	Poor (HUD)
Very good (HUD)	Don't know (HUD)
Good (HUD)	
Fair (HUD)	

Pregnant Yes No **If yes, projected birth date** ____/____/____

Source of Monthly Income: Please Circle all that apply

Veteran's disability payment (HUD)	Medicaid (HUD)	SCHIP (HUD)
Alimony	Medicare (HUD)	Section 8, public housing or rental assistance (HUD)
Alimony or other spousal support (HUD)	No Financial Resources (HUD)	Self employment wages
Annuities	Other (HUD)	Special supplemental nutrition programs for WIC (HUD)
Bridge	Other TANF-funded services (HUD)	Self employment wages
Child support (HUD)	Pension from a former job (HUD)	Special supplemental nutrition program for WIC (HUD)
Contributions from other people	Pension/retirement	SSDI (HUD)
Dividends (Investments)	Private disability insurance (HUD)	Unemployment
Earned Income (HUD)	Railroad retirement	
Food stamps (HUD)	Rental Income	
General assistance (HUD)	Retirement disability	
Interest (Bank)	Retirement Income from SSI (HUD)	

Total monthly income \$ _____

Means of transportation:

Bicycle	Other
Bus	Taxi
Car	Walk
Friend/family	(None)

Have valid drivers license Yes No

Presently attending school Yes No **If yes, school name** _____

Highest level of education attained:

College degree	Some high school	9th grade (HUD)
High school diploma/GED	Technical school training	10th grade (HUD)
Less than high school	No schooling completed (HUD)	11th grade (HUD)
Other	Nursery school to 4th grade (HUD)	12th grade (HUD)
Post Graduate	5th grade or 6th grade (HUD)	GED (HUD)
Some College	7th or 8th grade (HUD)	Post-secondary school (HUD)

Received Vocational training Yes No **Currently in school or working on any degree** Yes No

Degrees Earned Information:

None (HUD)	Masters (HUD)
Associates Degree (HUD)	Doctorate (HUD)
Bachelors (HUD)	Other graduate/professional degree (HUD)

If child enrolled, type of school Public Private **If no, date last enrolled in school** ____/____/____

Unemployed Yes No **If unemployed, looking for work** Yes No

If employed, hours worked last week _____ hrs.

If currently employed, select tenure Permanent (HUD) Temporary (HUD) Seasonal (HUD)

U.S Military veteran Yes No

Receiving veterans services Yes No

Military service related disability Yes No

Rhode Island HMIS Policies and Procedures Handbook

HUD Military Form

Name – PLEASE PRINT _____

Military Information:

U.S. Military Veteran (Please circle) Yes No

Discharge Type (Please Circle)

Honorable General Medical Bad Conduct Dishonorable Other (please specify):

Military Service Related Disability (Please circle) Yes No

Receiving Veterans Services? (Please circle) Yes No

If yes, List Veterans Services

Months Served on Active Duty in the Military _____

Military Service Era Information: (Please circle all that apply)

Persian Gulf Era (August 1991-Present) Afghanistan Post Vietnam (May 1975-July1991)
Persian Gulf Era (August 1991 – Present) Panama Vietnam Era (August 1964-April 1975)
Lebanon Between WWII and Korean War (August 1947 – May 1950) Grenada
World War II (September 1940 – July 1947) Bosnia Korean War (June 1950 – January 1955)
Between Korean and Vietnam War (February 1955- July 1964)

Military Branch (Please circle all that apply)

Army Coast Guard Air Force National Guard Air Force National Guard
Marines Navy Other

Did you serve in a War Zone? (Please circle) Yes No

War Zone Information: (Please circle all that apply)

Europe North Africa Vietnam Laos and Cambodia China, Burman, India
Korea South Pacific Persian Gulf Other

How Many Months Served in War Zone? _____

Did you receive hostile or friendly fire in a War Zone? (Please circle) Yes No

Rhode Island HMIS Policies and Procedures Handbook

Food & Shelter Board Backup Report (Children Forms) Agency Provider No. _____

- 1. Date of Entry _____ Date of Exit _____ 2. Client ID No. _____
- 3. Name _____ 4. Date of Birth _____ Age _____
- 5. SS# _____ 6. Gender _____
- 7. Race _____ 8. Ethnicity _____
- 9. Primary Language Spoken: _____ 10. City/Town of Last Residence: _____
- 11. Is Client Involved With DCYF? _____ 12. Other Problems _____

Food & Shelter Board Backup Report Agency Provider No. _____

- 1. Date of Entry _____ Date of Exit _____ 2. Client ID No. _____
- 3. Name _____ 4. Date of Birth _____ Age _____
- 5. SS# _____ 6. Gender _____
- 7. Race _____ 8. Ethnicity _____
- 9. Primary Language Spoken: _____ 10. City/Town of Last Residence: _____
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HMIS Data Collection Statement

We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.

Rhode Island HMIS Policies and Procedures Handbook

1. **Version 1.0. October 30, 2004. Initial Policy**
2. **Version 1.1. January 15, 2005. Revised access/correction procedure.}**
3. **Version 2.0: Revisions, Additions, Deletions (11/06)**

Title Page.....	revised
Table of Contents	revised
Introduction	revised
POLICY 1: RIHMIS Contract Requirements.....	revised
POLICY 5: Participating Agency Responsibility	revised
POLICY 10: Participation And Implementation Requirements.....	revised
POLICY 14: Written Client Consent Procedure for Electronic Data Sharing	revised
POLICY 17: Information Security Protocols	revised
POLICY 19: Maintenance Of Onsite Computer Equipment.....	revised
POLICY 20: RIHMIS Steering Committee Grievance Procedure.....	addition
POLICY 21: Access Levels for System Users	revised
POLICY 23: Access to client paper records.....	revised
POLICY 24: Unique User Id and Password.....	revised
End User Agreement	revised
Oral explanation of RIHMIS to client Script	revised

Version 2.1: Revisions, Additions, Deletions (1/06)

Policy 27: Using RIHMIS Data for Research	addition
Partnership Agreement	addition
List of Revisions, Additions, Deletions	

Version 2.2: Revisions, Additions, Deletions (11/06)

This document was revised on 11/06 and adapted from the Connecticut Coalition to End Homelessness for use in the Rhode Island HMIS CoC.

Version 2.3: Revisions, Additions, Deletions (03/07)

This document was revised on 08/29/2007.

HUD Entry/Exit form.....	revised
Client Consent form.....	revised
Letter-To-Number Code Conversion cannot be used because of duplicates.....	deleted

Rhode Island HMIS Policies and Procedures Handbook

Revised 08/06/2008

Unemployment added to the HUD Form.....revised

Foreclosure added to the F&SB report.....revised