

San Luis Obispo County HMIS Policies & Procedures

Continuum of Care:

CA-614 San Luis Obispo County

HMIS Lead Agency:

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1. Revision History

These Policies and Procedures shall be reviewed and, if necessary, revised at least annually by the Continuum of Care. See Section 6.10 for Policies and Procedures related to changes of this and other documents.

Date	Author	Description
11/27/2012	County of San Luis Obispo Department of Planning and Building	Full revision referencing all HUD standards and 2011 HEARTH HMIS Proposed Rule
1/6/2014	County of San Luis Obispo Department of Planning and Building	Revisions referencing designations
10/27/2016	County of San Luis Obispo Department of Planning and Building	General revisions
7/21/2021	County of San Luis Obispo Department of Social Services	General revisions and updates
08/22/2023	County of San Luis Obispo Department of Social Services	Formatting update and revisions to reflect the FY 2024 HUD Data Standards
1/9/2024	County of San Luis Obispo Department of Social Services And the Institute for Community Alliances (ICA)	Revisions to reflect the migration and functionality in BitFocus Clarity Human Services
12/13/2024	County of San Luis Obispo Department of Social Services, ICA, and HSOC Data & Performance Committee	Revisions to update Roles and Responsibilities, Grievance Policy, Posted Notice, and Data Quality Management Plan

2. Introduction

The Homeless Management Information System (HMIS) is a longitudinal database to assist in the service of homeless populations throughout the United States. It is designated by a local Continuum of Care (CoC) to comply with the requirements of the CoC Program Interim Rule 24 CFR 578. The San Luis Obispo Continuum of Care (CoC) has implemented this system since 2010. It has undergone several instances of change since the initial implementation. With this version of Policies and Procedures the Homeless Services Division within the Department of Social Services hopes to see further expansion of participating agencies and streamlined delivery of Homeless Services. The Homeless Services Division is undergoing a multi-year effort to grow and improve the system.

HMIS Data and Technical Standards Final Notice, published by HUD in July 2004, and revised in March 2010. As described in the March 2010 HMIS Data Standards Revised Notice, an HMIS is an electronic data collection system that stores longitudinal person-level information about persons who access the Homeless Services system in a Continuum of Care. HMIS is a valuable resource because of its capacity to integrate and de-duplicate data from all homeless assistance and homeless prevention programs in a Continuum of Care.

Aggregate HMIS data can be used to understand the size, characteristics and needs of the homeless population at the local, state, and national levels.

The following HUD HMIS Standards were referenced in the creation of this document:

- 2004 HMIS Data and Technical Standards Final Notice
- Guidance on HPRP Subgrantee Data Collection and Reporting for Victim Service Providers
- 2010 HMIS Data Standards Revised Notice
- 2011 HMIS Requirements Proposed Rule

HMIS is used by the federal partners and their respective programs in the effort to end Homelessness, which includes:

- US Department of Health and Human Services (HHS)
- US Department of Housing and Urban Development (HUD)
- US Department of Veterans Affairs (VA)
- Housing Opportunities for Persons with HIV/AIDS (HOPWA)

Partners with funding from the State of California may be required to participate in HMIS under Title 42. Programs with other sources of funding are not required to participate in the HMIS, but they are strongly encouraged to participate to contribute to a more comprehensive understanding of homelessness in the region.

Comparable databases are required for use by providers of services for survivors of domestic violence, as described in the Violence Against Women Act (VAWA). It is the San Luis Obispo County CoC HMIS Lead's responsibility to ensure the compliance of comparable databases. Other federal and state partners also require HMIS participation for grantees and subrecipients.

The HMIS and its operating policies and procedures are structured to comply with the most recently released [HMIS Data Standards](#). Recognizing that other Federal, State, and local laws may further regulate agencies, the San Luis Obispo County CoC may negotiate its procedures and/or execute appropriate business agreements with Partner Agencies so they are in compliance with applicable

laws.

3. Governing Principles

Described below are the overall governing principles upon which all decisions pertaining to HMIS are based. Participants are expected to read, understand, and adhere to the spirit of these principles.

3.1 Confidentiality

Policies regarding client data are founded on the premise that a client owns his/her personal information. Everyone will have the right to grant informed consent, limit data sharing, or revoke consent related to his/her PPI at any time. Policies are in place to protect client, agency, and the SLO County CoC's interests. Collection, access and disclosure of client data through HMIS will only be permitted by the procedures set forth in this document.

The protection of clients' rights and privileges is crucial to the successful operation of HMIS. These policies and procedures are intended to ensure clients' privacy without impacting the delivery of services. Security and confidentiality will be prioritized by System Administrators and End Users at all times.

3.2 Data Quality

All End Users will strive for the highest possible degree of data quality. Complete and accurate data recording will help improve service coordination and data-driven decision making.

3.3 System Availability

The availability of a centralized data repository is necessary to achieve an aggregation of unduplicated homelessness statistics. The San Luis Obispo County CoC will strive for broad deployment and availability of the HMIS by human service agencies that adopt the aforementioned governing principles.

4. Roles and Responsibilities

4.1 Homeless Services Oversight Council

The Continuum of Care, through its Governing Board the Homeless Services Oversight Council (HSOC) is responsible for the governance of the San Luis Obispo HMIS. In all HMIS governance decisions, the Continuum of Care will balance the interests and needs of all HMIS stakeholders, including clients, service providers, and policy makers. Through this role it will provide the following:

- Oversight to the HMIS Lead
- Approval of HMIS policy forms and documentation
- Ensure Agency participation and feedback
- Approve and facilitate HMIS Funding
- Compliance with HMIS Policies & Procedures

4.2 HMIS Lead Agency

The San Luis Obispo Department of Social Services (DSS) will serve as the HMIS Lead Agency, known informally and interchangeably as HMIS Lead or HMIS Lead Agency. The HMIS Lead Agency provides day-to-day management of system participation, operations, and security. Through this role, DSS staff will be the primary contact for both HUD and the HMIS vendor. HMIS lead staff will bring in additional subcontractors to fulfill these tasks as necessary. In addition, they will be responsible for the following:

- Negotiate software vendor contracts
- Evaluate potential Partner Agencies for HMIS Participation
- Ensure Compliance with HMIS Policies & Procedures
- Authorized agent for Agency Participation Agreements
- Creation of Project forms and documents
- Maintain up to date information on the HMIS website
- Monitoring end user licenses
- Point of contact with software vendor
- Add & Remove user rights
- Develop and administer training curriculum
- Ensure documentation of training
- Provide confidentiality training
- Provide initial software training for Agency Administrators and end users
- Provide end user support
- Review security of Participating Agencies via site visits
- Monitor data quality and timeliness
- Assure vendor adherence to HMIS Data and Technical Standards
- Application Customization
- Aggregate data reporting and extraction per agency needs
- Assist Partner Agencies with agency-specific data collection and reporting needs
- Manage User licenses

4.3 HMIS Partner Agency

- An HMIS Partner Agency is an entity that has agreed to uphold these Policies and Procedures

by executing an HMIS Participating Agency Agreement with the County of San Luis Obispo. Representatives from HMIS Partner Agency are responsible for the actions of the HMIS End Users within their agency workgroups. Serve as Authorizing Agent for Partner Agency

- Designates 1-2 Agency Administrators
- Notify HMIS Lead Agency of departure of any HMIS user, before or on the date of their departure in order to maintain site security and client confidentiality
- Designate individual for Agency Technical support
- Monitor Agency compliance with Policies & Procedures
- Hold executed Client Informed Consent forms
- Serve as Authorizing Agent for user ID requests
- Ensure compliance with HMIS Policies & Procedures
- Ensure data quality and timeliness
- Ensure data is corrected on monthly data quality reports or per request of HMIS Lead
- Attend monthly HSOC Finance and Data Committee meetings
- Monitor security of staff workstations
- Maintain their agency's internet connectivity
- Ensure virus protection and spyware detecting software is installed on all computers that access HMIS and ensure a virus scan is run at least once a week
- Run data integrity reports, run down discrepancies and make corrections

4.4 HMIS Agency Administrator

- Serves as main point of contact between HMIS Lead and Partner Agency
- Enrolls HMIS users in New User Training
- Serves as first level in evaluating and addressing any HMIS data entry questions

4.5 HMIS End User

An HMIS End User is an individual designated by the Partner Agency to enter, view, or contribute client Protected Personal Information (PPI) into the San Luis Obispo HMIS on behalf of the Partner Agency. All HMIS End Users are required to complete training assigned by the HMIS Lead Agency, adhere to all End User responsibilities outlined in the HMIS Policies and Procedures, and sign the San Luis Obispo HMIS End User Agreement.

All HMIS End Users are required to read and comply with the most recent HMIS Data Standards Manual. Failure to comply with the HUD standards warrants the same consequences as failure to comply with SLO CoC HMIS Policies and Procedures. In any instance where these Policies and Procedures are not consistent with the HUD Standards, the HUD Standards take precedence. Should any inconsistencies be identified, the end user and Partner Agency are expected to immediately notify the HMIS Lead Agency.

- Sign HMIS End User Agreement
- Attend and participate in HMIS training provided by the County of San Luis Obispo
- Safeguard client privacy through compliance with confidentiality policies
- Collect data as specified in end user training and as directed in compliance with the HMIS Policies and Procedures
- Enter data within 3 business days of program entry or exit
- Adhere to the HMIS Policies & Procedures

5. Operating Procedures

5.1 Agency Participation

Agencies participating in HMIS shall commit to abide by the governing principles of HMIS and adhere to the terms and conditions of this partnership as detailed in the HMIS Participating Agency Agreement.

Participating agencies must have a signed HMIS Participating Agency Agreement prior to project set up, entry of client data or requesting HMIS end users. This document allows agencies to specify if they would like their client data shared with other agencies in the database. Data sharing is encouraged, with appropriate client consent, to help facilitate referral of services between agencies. This will also help reduce the number of duplicate entries. New Agencies interested in participating in HMIS must enter into an HMIS Participating Agency Agreement, which the HMIS Lead Agency reserves the right to approve, deny, or seek additional information thereof. Upon receipt of an executed Agency Agreement, HMIS Lead staff will begin the New Project Set- Up and New User processes detailed below. Once a new agency is granted access to HMIS by the HMIS Lead, the new agency will be added to the list of participating agencies posted to the HMIS website.

Assign Participating Agency HMIS Administrator

Each Partner Agency shall designate a primary contact for communications regarding HMIS. This individual will receive regular updates regarding any changes in HMIS and monthly Data Quality reports. They will be expected to respond to any direct inquiries on data quality issues and assist in overall compliance and training new users at their agency. For Partner Agencies that do not designate an HMI Agency Administrator, the HMIS Lead reserves the right to assign one.

Minimum Participation Standards

HMIS partner agencies and users that enter data into HMIS directly must collect all of the universal data elements, as defined by HUD, for all clients receiving services in programs participating in the San Luis Obispo County HMIS. Additionally, all participating agencies are responsible for ensuring that Common Program Specific Data Elements, as defined by the [HMIS Data Standards](#), are collected from all clients that are served by applicable HUD funded programs.

Other optional data elements may also be required for certain programs or Coordinated Entry. Any optional or custom data elements will be developed in partnership with stakeholders and approved by the Homeless Services Oversight Council (HSOC).

5.2 New Project Set-Up, Project Closures and Project Changes

Participating agencies in HMIS are expected to submit a New Project Request Form for all new projects within the HUD recommended timeframe of 90 days prior to serving clients or spending funds specific to HMIS compliance. Agencies must be in compliance with and have a current Agency Agreement with HMIS LEAD to submit new projects. The New Project Form can be retrieved online at the HMIS Knowledge Base website, <https://slocounty.helpscoutdocs.com/> or by emailing the HMIS Support inbox. It is the responsibility of the HMIS participating agency to ensure projects are set up correctly and timely. Projects entered into HMIS, unless specifically determined otherwise, are subject to the San Luis Obispo CoC HMIS Data Quality Management Plan.

HMIS Agency Administrators are responsible for informing HMIS Lead staff when a project is no longer serving clients. The HMIS Lead will deactivate the project in HMIS so no new enrollments can be added to the project. Data from deactivated projects will remain available in HMIS for 7

years per HUD requirements. Agency Administrators interested in requesting changes to current projects in HMIS must reach out directly to the HMIS Lead by emailing the HMIS Support inbox at: ss_hmissupport@co.slo.ca.us, or an otherwise determined support ticket process.

5.3 New User Enrollment

Any agency that is a provider of homeless services to clients in San Luis Obispo County is encouraged to participate in contributing data to HMIS. Participation may be required depending on funding source. The HMIS Lead will determine if there are available user licenses. New users will only be enrolled in HMIS after an HMIS Participating Agency Agreement is in place.

Detailed New User Enrollment Process can be found at the HMIS Knowledge Base at slocounty.helpscoutdocs.com. New users must be enrolled in training by an Agency Administrator. It is the responsibility of the Agency Administrators and individual users to ensure timely and accurate completion of HMIS End User Training as outlined in the HMIS Knowledge Base and the training website.

User access is agency and project specific and at the discretion of the HMIS Lead Agency. User access level will be determined based on the information provided in the “Sign Up” section of the HMIS training website.

User IDs are individual, and passwords are confidential. No individual should ever use or allow use of a User ID that is not assigned to that individual, and user-specified passwords should never be shared or communicated in any format.

HMIS Partner Agencies must notify HMIS Lead and Homeless Services staff of relevant personnel changes. Additional details regarding change of user status can be found in the section for Deactivating Accounts below.

5.4 Security

Assessment

For new agencies accessing HMIS, the Partner Agency's Administrator(s) will meet with Homeless Services staff to review and assess the security measures in place. They will assess agency information security protocols. This review shall in no way reduce the responsibility for agency information security, which is the full and complete responsibility of the Partner Agency and its staff.

Annual Security Audit

Existing HMIS Participating Agencies may be subject to additional security assessments during Annual HMIS Project Monitoring. Site visits will be held to confirm security at participating HMIS Partner Agencies during this monitoring. Agencies will be notified in advance of any site visit

Workstation Security

Each HMIS user is required to utilize the following at their workstation:

- Anti-spyware software and virus protection properly installed
- A full-system scan has been performed within the last week
- Each workstation has and uses a hardware or software firewall
- Screens that “go to sleep” after 5 minutes of inactivity and require a password to re-activate
- Screens positioned or equipped so that data is not visible to others
- Does not have usernames and/or passwords posted in visible locations

Prior to access, Partner Agencies will confirm that any workstation accessing HMIS has and uses a hardware or software firewall and that anti-virus software performs frequent full-system scans.

Unencrypted PPI may not be stored or transmitted in any fashion—including sending file attachments by email or downloading reports including PPI to a flash drive, to the End User’s desktop or to an agency shared drive. All downloaded files containing PPI must be deleted from the workstation temporary files and the “Recycle Bin” emptied before the End User leaves the workstation.

Access Rights

Access to the HMIS will only be approved for those staff members that require access for business purposes only. The user's access rights will be determined by the Partner Agency Administrator and the HMIS Lead.

If a user changes roles within a Partner Agency or needs to access new Projects within HMIS, the Partner Agency Administrator should contact Homeless Services staff to modify those permissions. It is important that the Partner Agency Administrator notifies the HMIS Lead of these changes as soon as possible so that rights can be added and removed as appropriate. Further details for Agency Administrators regarding removing access, personnel changes, and consequences for data breach found in the Deactivating Accounts section.

Password and User ID Assignment

Upon completion of training and signing the [User Agreement](#), the user will be assigned a unique ID and password to access the rights assigned that user within the HMIS. Users should not allow anyone else use of their assigned unique user ID. A user should never use an ID that is not assigned to them nor should passwords be shared and or communicated in any format. To do so is considered a breach of security and users may have their HMIS access revoked at the discretion of the HMIS Lead.

Changing Passwords

When the user logs onto the system for the first time they will be prompted to change their password to a password only they know. Passwords must consist of at least 8 characters, a combination of at least one upper case letter, at least one lower case letter, and at least one special character.

Passwords must be changed every 90 days. If they are not changed within that time period, they will expire and the user will be locked out of the system. Three consecutive unsuccessful attempts to login will disable the User ID until the HMIS Lead or Partner Agency Administrator reactivates the

account.

In the event a user's password has expired, or the user forgets their password, users may use the "Forgot Password" feature on the website to reset their password. If a user still cannot access the site, they should contact Homeless Services staff at ss_hmissupport@co.slo.ca.us for assistance.

Deactivating Accounts

It is important that a user account be deactivated in the system when they leave the agency or otherwise becomes inactive. It is a breach of security to have unused user accounts active. It is the responsibility of the Partner Agency Administrator to notify the HMIS Lead within two (2) business days if a staff member leaves the Agency. In the event that HMIS account access is not revoked for any reason, the former HMIS user is required to act with integrity and not attempt to access HMIS if their job duties no longer include HMIS or if they leave their HMIS participating agency.

Access may be immediately rescinded when any HMIS user is suspected of breaching the [Partner Agency User Agreement](#), violating the Policies & Procedures, or breaching confidentiality or security, while an investigation by the HMIS Lead and the Partner Agency is conducted. If the user is found to have breached or violated the above, and the Partner Agency does not otherwise permanently inactivate the user from the system (termination of employment, reassignment of duties) the HMIS Lead has the right to permanently inactivate the account thereby denying access to the system for that user.

Data Breach

A data breach is the unauthorized access or acquisition of data that compromises the security, confidentiality, or integrity of data in HMIS. Data may be in any format (electronic, hardcopy or verbal) and may consist of a single piece of data and/or an entire data system. Breaches to the HMIS servers are managed by the HMIS vendor. If a breach to the HMIS servers occurs, the HMIS vendor will notify the HMIS Lead, and the CoC. Should a data breach occur through a Partner Agency, the Partner Agency is required to notify the HMIS Lead immediately. The HMIS Lead and CoC reserve the right to revoke access to HMIS to any individual or Partner Agency because of a data breach. Additionally, HIPAA covered entities and their business associates are required to provide notification of a breach to the affected individuals, the US Secretary of Health and Human Services, and in some instances the media per the HIPAA Breach Notification Rule, 45 CFR Section 164.

5.5 Collection and Entry of Client Data

Each participating agency is responsible for their clients' data. Participating agencies must obtain informed consent prior to sharing any client protected identifiable information (PII) in the San Luis Obispo HMIS. These policies and procedures are intended to provide the minimum level of consent and accompanying documentation. Participating agencies may develop more stringent policies to fit their organizational needs.

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements (as specified in those requirements) and these Policies and Procedures. Agencies and programs are responsible for ensuring HIPAA compliance.

Victim service providers that are recipients of funds requiring participation in HMIS do not directly enter data into an HMIS but must use a comparable database in compliance with the latest HUD

HMIS Data Standards. A comparable database allows the collection of the aggregate data needed for reporting while respecting the sensitive nature of the client-level information if it complies with all HMIS data technical, and security standards. Legal service providers may also use a comparable database if allowed by the funder and said database is in compliance with all applicable standards.

HMIS-participating Agencies will be given access to view, enter or otherwise modify data in HMIS depending on the terms of their Agency Agreement. Some data may be restricted and not visible to all participating Agencies based on sensitive nature of the information or a client's right to request their data not be shared. Agencies receiving funding that requires HMIS but who have additional privacy restrictions including domestic violence shelters, law enforcement agencies or some healthcare agencies may enter data through data exchange but will not have direct HMIS access. Data entry via an existing Partner Agency may be allowable with the prior approval of the HMIS Lead.

The HMIS Lead Agency reserves the right to remove HMIS Access if the access is not being used to improve service provision for clients or contributing meaningful data to the CoC. Examples of unacceptable uses of HMIS include but are not limited to:

- a) Using HMIS data to monitor the whereabouts or service utilization of participants for purposes outside of housing-focused case management
- b) Using HMIS data outside of a business need
- c) Using data in HMIS as a reason to not serve a client that is not related to eligibility criteria (i.e. substance use history, mental health issues, etc.)
- d) Sharing client identifying data with persons or groups that don't have access HMIS

Client Informed Consent and Confidentiality

Client Data will only be shared with Partner Agencies if the Client consents, has signed the [Release of Information Authorization \(Appendix II\)](#), and the signed Informed Consent & Release of Information Authorization is available on record. All Universal and Common Program Specific Data Elements from the current [HMIS Data Standards](#) should be collected, subject to client consent.

Additional data may also be collected to support other programs. Client confidentiality is further detailed in the HMIS Privacy Notice (Appendix I).

Client Enrollment Data (Entry and Exit Data)

Client program entry and exit dates should be recorded for all program participants. Entry dates should record the first day of services or program entry with a new program entry date for each period/episode of services. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter/housing or the last day a service was provided in a program. Add bed night citation.

Data Timeliness

Per the [San Luis Obispo County CoC HMIS Data Quality Management Plan](#), HMIS data must be entered into HMIS in real time or within three (3) business days from the point of the event (intake/enrollment, service delivery, annual assessments, or exit/discharge).

Data Quality Plan

A Data Quality plan is a systematic approach for the CoC to establish and define data quality expectations. Data quality is a key component for HUD reporting purposes such as the System Performance Measures (SPM), Longitudinal Systems Analysis Report (LSA), Annual Performance

Report (APR), Point-In-Time (PIT) Count and Housing Inventory Count (HIC), as well as reporting purposes for federal and state partners. In addition, HUD ties data quality to overall CoC competitiveness for funding.

In order to qualify as “participating in the HMIS,” all HMIS Participating Agencies must meet the data quality benchmarks as described in the [San Luis Obispo County CoC HMIS Data Quality Management Plan](#). These benchmarks apply to all HMIS Participating Agencies, whether or not the agency provides the data directly into the HMIS or submits it to the HMIS Lead Agency for input into HMIS, including the following mandated projects: HUD Continuum of Care (HUD CoC) & Emergency Solutions Grant (ESG), US Department of Veterans Affairs Supportive Services for Veterans Families (VA SSVF), and US Department of Health and Human Services Runaway and Homeless Youth (HHS RHY) Substance Abuse and Mental Health Services Administration Projects for Assistance in Transition from Homelessness (SAMHSA PATH).

Data Quality Monitoring

The HMIS Lead will perform monthly data integrity checks on the HMIS data, which will include the following steps:

- Run latest version of the HUD Eva Data Quality Tool
- Notify Partner Agency Administrator of findings and timelines for correction;
- Re-run reports for errant agencies/programs, as requested. Follow up with Partner Agency Administrators if necessary;
- Notify Agency Executive Director if Partner Agency Administrators are not responsive to required corrective actions; and
- Notify HSOC Finance and Data Committee regarding any uncorrected data quality issues.

5.6 Release and Disclosure of Client Data

Client-specific data from HMIS may be shared with Partner Agencies only when the sharing agency has secured informed consent authorizing such sharing, as demonstrated by a signed HMIS Release of Information Authorization form, and only during such time that Client Informed Consent and Release of Information Authorization is valid (before its expiration). Other non-HMIS inter-agency agreements do not cover the sharing of HMIS data. Sharing of client data may be limited by program specific confidentiality rules.

The HMIS Release of Information Authorization (ROI) must constitute informed consent. The burden rests with the Partner Agency End User or intake counselor to inform the client about the purpose and function of HMIS data before asking for consent. As part of informed consent, a Privacy Posted Notice must be posted in the intake area explaining the reasons for collecting the data, the client’s rights regarding data collection, and any potential future uses of the data. An example of such a sign may be found on the HMIS website.

Partner Agency End Users must obtain a new signed ROI and enter it into HMIS if the client’s original release has expired. ROIs can be signed by the client electronically in the HMIS user interface, or may be uploaded to the client profile.

No client-specific data will be released or shared outside of the Partner Agencies unless the client gives specific written permission or unless withholding that information would be illegal. Note

that services may NOT be denied if client refuses to sign Release of Information Authorization or declines to state any information. Requests by any law enforcement agency, including State or Federal agencies, for information contained in HMIS must be directed to the HMIS Lead. This escalation must take place prior to sharing any client or programmatic information. These requests will be reviewed in accordance to San Luis Obispo County Department of Social Services policy. Notice and consultation will be given to agencies with shared clients. Regulation specific to law enforcement and legal data sharing is provided in the section for Collection and Entry of Client Data.

Aggregate data that does not contain any client-specific identifying data may be shared with internal and external agents without specific permission. This policy should be made clear to clients.

HMIS Privacy Posted Notice

HUD's HMIS Privacy and Security Standards specify the guidelines for the privacy and security of personal information collected and stored in an HMIS. The standards require each covered HMIS Participating Agency to publish a [HMIS Privacy Posted Notice](#). The standards establish baseline privacy requirements for the HMIS Participating Agencies. A HMIS Participating Agency must post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting this information. Consent of the individual for data collection may be inferred from the circumstances of the collection.

HMIS Privacy Notice

The [HMIS Privacy Notice](#) applies to all San Luis Obispo County CoC HMIS Participating Providers and addresses how information about clients may be used and disclosed at Providers as well as client rights over their information. The HMIS Privacy Notice may be amended at any time, and amendments may affect information obtained before the date of the amendment. The agency will provide copies of the privacy notice to any client upon request. The agency should also include a copy of the HMIS Privacy Notice on their organization website.

Clients' Rights to Data

A client shall have the right to receive a copy of HMIS data relating to their individual profile upon request.

Grievance Policy

Per the SLO County HMIS Privacy Notice, the client has the right to ask questions of, or submit grievances to, the provider regarding privacy and security policies and procedures.

The [HMIS Grievance Form](#) will be used for clients who feel their privacy rights have been violated by an HMIS Participating Agency. The form is to only be used after the client has worked with the agency to resolve an HMIS issue.

The client will submit the form to the HMIS Lead and will be reviewed by the HSOC Finance and Data Committee to recommend resolution between client and agency.

5.7 Reporting

Reporting for Funders

All standard HUD reports can be found in the Report Library in Clarity Human Services. Additionally, some users will have access to the Data Analysis feature in Clarity, that holds dashboards with more detailed information. These dashboards can be customized by emailing the help desk.

Custom reporting done on a regular cadence can be built into Clarity by submitting a request to the help desk. This will ideally be done before the project starts, so that data collection and reporting align. It is the responsibility of the Agency to inform the HMIS Lead of any report needs.

Funders may also request information for monitoring. These requests should be pre-determined whenever possible. The agency or agencies whose activities are being monitored must be informed, and the HMIS Lead must receive the request at least 10 days prior to the date when the report is needed.

5.8 Training

HMIS Orientation

All users accessing HMIS must first complete the San Luis Obispo CoC HMIS training. Training includes videos, written material, and quizzes located on the Homeless Services training website. The CoC and HMIS Lead Agency reserve the right to improve and innovate training procedures so long as reasonable and ample notice is provided for HMIS Partner Agencies and end users. Users will receive a link to access this site once they have been enrolled by an Agency Administrator as described in the New User Enrollment section of this document.

Training for privacy and security measures will occur annually, and all participating agencies and users must participate. Additionally, users must attest to their knowledge and application of the privacy and security measures.

Live Training

The Partner Agency Administrator will coordinate with the HMIS Lead to schedule any additional live trainings with the HMIS vendor and/or Homeless Services Staff. Live, virtual training will also be coordinated for any HUD Data Standard updates or other system changes. All users will be expected to attend these trainings or view a recording if one is made available.

Technical support includes issue reporting, requests for enhancements (features), or other HMIS-related requests. The HMIS Lead will only provide support for issues specific to the HMIS software and systems, not for technical support of hardware being used by HMIS users.

Request for Support

End Users should submit support requests to their Partner Agency HMIS Administrator, who may escalate the request to the HMIS Lead Agency, who may in turn escalate the request to the HMIS software vendor as appropriate. Under no circumstances should End Users submit support requests directly to the HMIS software vendor.

The user should evaluate the immediacy of the issue. If the user needs immediate resolution of the issue because the issue is hindering the user from being able to enter the data into the system, the user should contact the HMIS Lead at ss_hmissupport@co.slo.ca.us. When submitting a request to the HMIS Support inbox, only one issue should be contained per email. This will allow Support staff to more efficiently assign or escalate items.

Most common emergent issues are a forgotten password, a password that is not working, or the user is trying to access the system from a computer that an individual has not accessed the system from before. Forgotten passwords can be resolved using the “Forgot Password” button on the software landing screen.

HMIS Office Hours

HMIS End Users and Agency Administrators are encouraged to attend monthly HMIS Office Hours. These will be held virtually and will be an opportunity for users to bring questions or concerns to the HMIS Lead. Calendar invitations will be sent to new and existing users through the ss_hmissupport email.

6. Changes to The Policies and Procedures and Other Governance Documents

Revisions

The HMIS Lead will seek approval for revisions of all HMIS documents in consultation with the HSOC Finance and Data Committee. Final approval will be granted by a vote at the Full HSOC Committee.

Distribution

A copy of the revised Policies and Procedures document will be distributed to the partner agencies. Partner Agencies will be asked to sign a receipt acknowledging they have received the revised Policies and Procedures. It is the agency's responsibility to make sure everyone participating in the HMIS has access to a copy of the document, reads it, understands it, and agrees to comply with it. If anyone participating in the HMIS has issue with any revision, they may contact the HMIS Lead and voice their concern. They must, however, comply with the revisions or stop using the system until the issue is resolved.

7. Other Obligations and Agreements

The San Luis Obispo County CoC will decide funding responsibilities for additional licenses as the needs arise. While it may not be possible to meet every Partner Agency's request for End User licenses with the existing funding, the HMIS Lead Agency, in partnership with the Continuum of Care will endeavor to ensure that every Partner Agency will have its minimum requirements met.

8. Glossary of Terms

HMIS Vendor: BitFocus Clarity Human Services beginning in 2024.

Client: Any persons who is, has been, or will be entered into HMIS.

CES: Coordinated Entry System

CoC: Continuum of Care

End User: Any person given access to the database for entering or updating HMIS data.

HIPAA: Health Insurance Portability and Accountability Act

HMIS: Homeless Management Information System

HMIS Data Standards: HUD HMIS Data Standards Manual containing specification on type of data elements required. San Luis Obispo CoC will always use the most recent Data Standards Manual posted to the HUD Exchange.

HSOC: Homeless Services Oversight Council

HUD: U.S. Department of Housing and Urban Development

Appendix I- Privacy Notice (Updated)

San Luis Obispo County HMIS Privacy Notice

This Privacy Notice applies to all San Luis Obispo County HMIS-Participating Providers and addresses how information about you (client) shall be used and disclosed by Providers as well as rights over your information. This notice establishes minimum standards by which the Providers must follow. Providers may implement more stringent rules and procedures. This Notice may be amended at any time, and amendments may affect information obtained before the date of the amendment.

1. HMIS DATA COLLECTION & PURPOSE

A Homeless Management Information System (HMIS) is a local information technology system used to collect data on the housing and services provided to individuals and families experiencing homelessness and persons at risk of homelessness. This information is critical to better understand the extent and nature of homelessness at a local level, evaluate program effectiveness, and improve future housing and service provision. Providers may also be required by their funders to obtain certain additional information to determine eligibility, and to monitor outcomes.

This agency is an HMIS-participating homeless service provider ("HMIS Provider"). We collect information about the persons we serve in the shared County HMIS (HMIS) database. The agency shall only collect information deemed appropriate and necessary for program operation or information that is required by law or by the organizations that fund this program.

2. CONSENT

Through HMIS, we share your name, date of birth, age, gender, veteran status, and partial SSN ("Standard Information") with other HMIS Providers, unless you indicate that you do not want your Standard Information to be visible or tell an agency to mark your "Profile/Name" as private. You are still eligible for services if you refuse to have your standard information shared in HMIS.

Personal and Health Information: If you choose to sign the HMIS Consent for Release of Information (ROI), we will also share your enrollment information, which may include personal health information and information about your race, ethnicity, disabling conditions, previous residence history, employment history, substance abuse, sexual orientation, educational history and more. Your Standard Information and any information you release in your ROI is referred to as your Personally Identifiable Information (PII). This information will be visible in HMIS and may also be exchanged on paper, verbally or electronically based on uses and disclosures below.

Written consent to share your data in HMIS should be obtained at your first in-person meeting with the provider. Written consent may be obtained using the Electronic HMIS Consent for Release of Information, which indicates your consent to share your information.

Verbal consent to share your PII may only be obtained if the interaction meets the following criteria:

- The visit is not in person or not in a place conducive to paper or electronic signature.
- Agency staff reviews (or reads, if not in person) the Privacy Notice with you (posted at intake desk, on clipboard, via electronic methods or comparable location). An electronic link to the privacy notice can be found [here](#) (link).
- You verbally agree to provide and share personal information.
- Agency staff complete the Verbal Consent record in HMIS, attesting to their compliance with the procedure above.

3. PERMITTED USES AND DISCLOSURES

HMIS is designed to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data, including Personally Identifying Information. Once collected, we (as an HMIS Provider) have obligations about how these data may be used and disclosed (**uses** are internal activities for which providers interact with your PII; **disclosures** occur when providers share PII with an external entity). **We may use and disclose your PII only for the following purposes:**

To fulfill HUD Requirements:

- (1) To allow you to access to your information; and
- (2) Disclosures for oversight of compliance with HMIS privacy and security standards.
- (3) To provide or coordinate services to an individual or household, including with other California Counties;
- (4) For functions related to payment or reimbursement for services;
- (5) To carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions;
- (6) For creating de-identified reports from PII including public dashboards;

Additional Uses and Disclosures: In rare instances we may use or disclose your Personally Identifying Information without your permission for the following purposes:

- (7) Uses and disclosures required by law;
- (8) Uses and disclosures to avert a serious threat to health or safety;
- (9) Uses and disclosures about survivors of abuse, neglect or domestic violence; and
- (11) Uses and disclosures for law enforcement when a subpoena is provided.
- (12) For research or local analysis where a limited number of fields will be included.

HMIS Providers must also ensure that **any use or disclosure does not violate other applicable local, state, or federal laws**. Therefore, some HMIS Providers **may have more restrictive privacy policies**, often dependent upon funding source or the nature of a projects. Specific, per-project information regarding data use and disclosure can be obtained upon request. This can include agencies that must comply with the Health Insurance Portability and Accountability Act (HIPAA), Violence Against Women Act (VAWA). In these instances, the more restrictive policies take precedence.

4. UNDERSTANDING YOUR RIGHTS

HMIS recognizes every independent legal adult (person over 17 years of age) as the owner of all information about themselves, and any parent, legal guardian, or legal power of attorney as the designated owner of all information about any household members under their guardianship (all minors and any incapacitated/disabled adults).

By seeking assistance from this HMIS Provider and consenting to your personal information being shared within the HMIS, you transfer governance responsibility over your HMIS record to us, and we are responsible for handling your record in accordance with HMIS privacy policies and any applicable federal, state, or local requirements. You retain ownership of your information within your HMIS record, and as owner **you have the following rights, in general:**

- Your refusal to share information will not be used to deny you services at this agency.
- You have a right to see your information, request to change it, and have a copy of your information from the servicing agency by written request. You may also request assistance from this agency in documenting your history of homelessness to qualify for certain programs. An agency can refuse to change information but must provide you with a written explanation of the refusal within 60 days of the request¹

¹ We can deny a request to inspect or copy your PII for the following reasons: (1) *Provider Right to Deny Review: if information is compiled in reasonable anticipation of litigation or comparable proceedings;* (2) *if information about another individual other than the participating provider staff would be disclosed;* (3) *if information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the sources of the information;* or (4) *if the disclosure of information would be*

- Any information you provide related to race, color, religion, sex, national origin, disability, familial status, and actual or perceived sexual orientation, gender identity, or marital status will not be used in any way that would discriminate against you or prevent you from receiving services or housing assistance. You have the right to file a complaint if you feel that you have been discriminated against.
- You may request a copy of this Privacy Notice and other agency policies that explain HMIS and your rights associated with how information is kept and shared through HMIS.
- You may request that a provider mark your personal data as private (not shared) within HMIS; and
- You may withdraw your consent to share at any time by writing to the staff identified in our Agency Privacy Notice. However, any information already shared with another agency cannot be taken back. Your request to discontinue sharing will have to be coordinated between sharing partners. You should tell each agency that you work with when you withdraw your consent.
- The confidentiality of your records is protected by law. This agency will never give information about you to anyone outside the agency without your specific written consent through this release or as required by law (The regulations are 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 (HIPPA), 45 CFR, Parts 160 & 164) and applicable California laws.
- **You should expect to provide additional, prior written consent for any use or disclosure of HMIS PII not included in the permitted uses and disclosures above.**

5. Requests and Grievance Policy

Agency Requests and Grievance

If you feel your privacy rights have been violated, or to request changes or copies of your records, please first submit a written request to the agency at which you are receiving services. Any privacy violations involving breaches of data will be reported to the HMIS Lead Agency. All other grievances must go through the grievance process at the agency at which you are receiving services. You cannot be retaliated against for filing a grievance. The grievance process may involve multiple steps for resolution. You may request to see the agency's full grievance process.

Escalated Grievance Policy

An escalated grievance is to only be used after you have worked with the agency to resolve an HMIS issue and that resolution was not satisfactory. The [HMIS Grievance Form](#) or a similar written format can be used if you feel your privacy rights have been violated by an HMIS Participating Agency.

You may submit this form to the HMIS Lead to the contacts below. This will be reviewed by HMIS Lead Staff and routed to an internal review body. It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.

Grievances may be submitted in writing to:

County of San Luis Obispo Dept of Social Services
 Attn: HMIS Program Manager
 3433 S. Higuera St San Luis Obispo, CA 93401
 Or
 Via Email to: SS_hsdconcern@co.slo.ca.us

reasonably likely to endanger the physical safety of any individual; and we can reject repeated or harassing requests for access or correction.

Appendix II- Consent for Release of Information

San Luis Obispo County Continuum of Care Homeless Management Information System

Consent for Release of Information

The San Luis Obispo County Continuum of Care (CoC) Homeless Management Information System (HMIS) is a secure database used to collect data on the housing and services provided to individuals and families experiencing homelessness and persons at risk of homelessness. Providers participating in a HMIS are required to collect universal data elements from all clients, including Personally Identifiable Information (PII), demographic characteristics, and residential history. This information is critical for providers and communities to better understand the extent and nature of homelessness at a local level, evaluate program effectiveness, and improve future housing and service provision. Some providers are also required by their funders to obtain certain additional information to determine eligibility, and to monitor outcomes. Most federally-funded homeless service providers are required to participate and record the clients they serve in an HMIS. This Agency participates in HMIS and shares information with other HMIS Participating Agencies to help coordinate the most effective services for you and your household members.

What information is shared in HMIS?

Standard Information	Personal and Health Information
• Name • Date of Birth • Age • Gender • Veteran Status • Partial SSN • Race and Ethnicity	• Disabling Conditions, including substance use disorder and mental health conditions • Health Insurance Information • Homeless History • Employment Status • Sexual Orientation • Educational History • Domestic Violence Survivor data, if applicable.

How your information will be used?

- To provide or coordinate services on behalf of an individual or household;
- For payment or reimbursement for services;
- To carry out administrative functions, including but not limited to oversight and management functions; or
- For creating summary reports without identifying you or confusing you with someone else
- For additional, specific uses defined in the HMIS Privacy Policy.

Who can have access to your information?

Your information will be shared with other San Luis Obispo CoC HMIS Participating Agencies that agree to maintain the security and confidentiality of the information. For additional coordination of care and deduplication, your information may be shared with the Santa Barbara/Santa Maria CoC-CA 603 or the State of California's Homeless Data Integration System, HDIS. A list of HMIS Participating Agencies is available upon request.

How is your personal information protected?

The information that is collected in HMIS is protected by limiting access to the database and by limiting with whom the information will be shared, in compliance with the standards set forth in federal, state and local regulations governing confidentiality of client records. Each person and agency that is authorized to read or enter data into HMIS has signed an agreement to maintain the security and confidentiality of the information. HMIS data is secured by passwords and encryption technology.

By signing this form, you understand and agree that:

- Your refusal to share information will not be used to deny you services at this agency.
- You have a right to see your information, request to change it, and have a copy of your information from the servicing agency by written request. You may also request assistance from this agency in documenting your history of homelessness to qualify for certain programs. An agency can refuse to change information but must provide you with a written explanation of the refusal within 60 days of the request.
- Any information you provide related to race, color, religion, sex, national origin, disability, familial status, and actual or perceived sexual orientation, gender identity, or marital status will not be used in any way that would discriminate against you or prevent you from receiving services or housing assistance. You have the right to file a complaint if you feel that you have been discriminated against.
- You may request a copy of this Privacy Notice and other agency policies that explain HMIS and your rights associated with how information is kept and shared through HMIS.
- You may request that a provider mark your personal data as private (not shared) within HMIS; and
- You may withdraw your consent to share at any time by writing to the staff identified in our Agency Privacy Notice. However, any information already shared with another agency cannot be taken back. Your request to discontinue sharing will have to be coordinated between sharing partners. You should tell each agency that you work with when you withdraw your consent.
- The confidentiality of your records is protected by law. This agency will never give information about you to anyone outside the agency without your specific written consent through this release or as required by law (The regulations are 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 (HIPPA), 45 CFR, Parts 160 & 164) and applicable California laws.
- **You should expect to provide additional, prior written consent for any use or disclosure of HMIS PII not included in the permitted uses and disclosures above.**

SIGNATURE AND ACKNOWLEDGEMENT

Your signature indicates that you have read (or been read) this client consent form, have received answers to your questions. Check the appropriate box to indicate:

- ☐ Consent: You willingly consent to have your information, and that of your minor children or dependents (if any), entered into the HMIS database. You also consent to share your information with other participating organizations as described in this consent form.
- ☐ Decline: You understand the information presented and you DO NOT want your Personal and Health Information shared. You understand that the Standard Information will still be shared, but not connected with this agency or program in HMIS.

CLIENT NAME

SIGNATURE OF CLIENT

DATE

SPOUSE NAME

SIGNATURE OF SPOUSE

DATE

Signature of guardian or authorized-representative (when required): _____

Relationship to client: _____ Date signed by guardian/authorized representative: _____

This release of information also applies to the following dependents:

Last Name	First Name	Date of Birth