



COMMUNITY TECHNOLOGY ALLIANCE

Networking Solutions for the Community

Highlights of the New and Revised Proposed Draft Data Standards: 2008

These highlights are based on the drafts issued at the HMIS National Conference in Atlanta, September 21 – 23, 2008. These highlights do not cover every change or revision proposed but attempts to capture the main themes.

HUD currently proposes to consider comments and feedback given at the Atlanta Conference and incorporate that feedback into the draft that will issue in a couple of months. There will then be a 90 day comment period with the Final publication of the Standards in Spring 2009. There may therefore be changes to what is in this paper when the draft finally issues.

Main Thrust:

Generating a community wide understanding of the extent and nature of homelessness and assessing the effectiveness of programs that serve persons who are homeless within each CoC.

Clarified and Emphasized Definition of “Unduplicated Accounting of Homelessness”:

An unduplicated accounting of homelessness is not just the count but includes measuring the extent and nature of homelessness, utilization of homelessness programs over time, and the effectiveness of homelessness programs.

*Standards apply to HMIS and organizations operating other systems that send PPI to HMIS, organizations processing of any data on clients whether on paper or electronic media, recorded for HMIS or extracted from HMIS. Any client data collected **on paper or electronically** with the intention of automatically or manually transferring the information to the HMIS must be collected, maintained and secured in the same manner as client data stored in the HMIS.*

Renewed emphasis and clarification on the roles and responsibilities of Continuums of Care as the ultimate responsible authority for HMIS.

Changes required to accommodate the new APR which will need to be electronically generated from HMIS, new Annual Homeless Assessment Reports and Bed Inventory and Utilization and to provide options for measuring program performance.

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Deadline:

HUD will consider the feedback from the Atlanta Conference and will issue DRAFT Standards within the next couple of months. There will be a 90 day comment period and the Final Standards are expected to issue in Spring 2009.

Continuums of Care will have 6 months to approve all local changes and Lead Agencies will have 6 months to implement all changes. All changes must be implemented within 12 months of the publication of the Final Standards.

HMIS Participation:

*With the exception of victim service providers defined by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA), **all programs that are inventoried as part of the CoC must participate in the HMIS as contributory programs, whether or not the specific program receives direct funding from HUD or other federal agencies.** These programs include prevention, outreach, emergency shelter, transitional housing, permanent housing and permanent supportive housing, and supportive services designed to meet the specific needs of people who are homeless. Other programs providing services to homeless persons are encouraged to participate in the HMIS.*

HUD expects to set a goal for all Continuums of Care to include **at least 75% of the non-HUD funded programs** to be "Contributing Agencies" to HMIS.

***The CoC must collect program information in the HMIS on all homeless assistance programs in the CoC, regardless of whether the program participates in the HMIS.** The general purpose of these requirements is to ensure that the HMIS is the central repository of information about homelessness in the CoC, including both programs and clients*

***Program descriptor data for all victim service providers (DV) must be included in the HMIS; however a street address for a facility that provides services to clients need not be included.** This does not mean that DV client data should be in HMIS.*

Program Descriptor Data Elements:

- *New – 12 new Program descriptor elements.*

Governance:

This is a whole new section.

- *Each CoC is responsible for formally designating a HMIS Lead Agency with whom the CoC must enter into a **written HMIS Governance Agreement** that specifies the functions and responsibilities of the HMIS Lead Agency on behalf of the CoC.*
- *The designation should occur by resolution or other formally documented action of the CoC.*

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At a minimum, the HMIS Lead Agency has the responsibility to establish, support, and manage the HMIS in a manner that will meet HUD's Standards for minimum data quality, privacy, security, and other requirements for organizations participating in an HMIS. An HMIS Lead Agency may also define additional standards that reflect local requirements, provide protections that exceed HUD Standards, or take into account other applicable laws.

- *If the CoC expects the HMIS Lead Agency to seek advice or approval from an HMIS Steering Committee or other CoC committees, the roles, requirements, and relationships should be specified in the Agreement.*
- *The Agreement should also define the rights, obligations, timelines, and **transition procedures for HMIS governance, software, and data, in the event that the agreement is terminated.***
- *The HMIS Lead Agency must formally designate the information system that will be used as the CoC's official HMIS. The designated information system must be operated in compliance with the HMIS Data and Technical Standards.*
- *The 2008 Standards require the CoC to designate one system to be used by the CoC to generate an unduplicated accounting of homelessness.*
- *The HMIS Lead Agency must execute an HMIS Participation Agreement with each [new definition] "Contributing HMIS Organization" (CHO) that defines: 1) the data quality, privacy, security, and other standards that a CHO must meet in order to participate in the Lead Agency's HMIS; and 2) the requirements that the HMIS Lead Agency must meet in order to accept PPI contributed to the HMIS by the CHO.*
- *Each CHO is responsible for implementing internal procedures to ensure and monitor compliance with applicable agreements and baseline Standards.*

Universal Data Elements:

Largely unchanged but some additional response categories have been added.

- *"Don't Know" and "Refused" response categories have been added.*
- *Race and Ethnicity have been split into two separate data elements.*
- *A data quality response has been added to Date of Birth.*
- *Transgender has been added as an acceptable response.*
- *Disabling condition is now to be asked of **ALL** clients.*
- *Safe Haven has been added as a response to prior residence.*
- *A new "Homeless Status" element added (literally homeless, at imminent risk of becoming homeless, precariously housed, in stable housing).*

Program-Specific Data Elements:

- *"Don't Know" and "Refused" response categories have been added.*
- *Certain elements such as "Income and Sources" and "Non-Cash Benefits" are now required for assessment at program entry, exit AND at least once annually.*
- *Follow-up question added to data elements related to Disabilities to help determine whether a client is currently receiving services for their condition. Information now to be collected at program entry, and at program exit.*

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- *Some data elements previously asked only of adults should now be asked of **all** clients, including children. (non-cash benefits, physical disability, developmental disability, chronic health condition[a new data element]HIV/AIDS, mental health, substance abuse, DV, Street Outreach, employment, education)*
- *Two new data elements required for street outreach programs that complete APRs. These are "Date of engagement" and Date of contact"*
- ***All programs that complete an APR** are now required to collect information about client progress on one or more domains (18 domains to choose from) that can be used to assess client self-sufficiency and measure program performance. Recommend a 5 point scale **Self-Sufficiency Matrix**.*

Data Quality Standards:

- *CoC must implement data quality benchmarks.*
- *HUD Required benchmarks are*
 - *that "95% of data entered into HMIS must reflect what clients are reporting"*
 - *"Across the CoC, all (100%) of (non-domestic violence) programs needed to achieve an unduplicated count must participate in the HMIS" Goal benchmark is 75% of all non-HUD funded programs to be in HMIS.*
 - *Missing information for each participating agency does not exceed 10% for required Universal and program specific elements in any given month".*
 - *"Client information is entered within 5 days of intake"*
 - *Client information that changes must be updated regularly'*
- *Lead Agency must develop and implement a Data Quality Plan. HMIS Lead Agency is tasked with monitoring the quality of the data produced by individual agencies.*
- *Data Quality Plan must be submitted to The CoC within 6 months of release of Final Notice.*
- *Plan must be implemented within 6 months of approval of the CoC.*
- *Plan must identify specific staff at Lead Agency and participating agencies charged with implementation.*
- *Plan must describe procedures that Lead Agency will take to implement the Plan and procedures for reporting on progress toward meeting the benchmarks.*
- *Plan must be updated annually.*
- *Participating agencies must address issues identified within 4 weeks.*

Privacy Standards:

Revised to better reflect how privacy standards are developed and applied within a shared operating system.

- *Lead Agency must develop a Privacy Policy*
- *At a minimum:*
 - *1) describes its role in the processing of PPI obtained from CHOs;*
 - *2) describes accountability measures for meeting applicable privacy and security obligations;*

- 3) informs data subjects how to pursue their privacy rights with CHOs for PPI about themselves that the Lead Agency processes;
 - 4) describes the community privacy standards for CHOs applicable to contributory program and non-contributory program participating in the HMIS, including standards and procedures for CHO programs that are covered by HIPAA and other privacy rules;
 - 5) describes the Lead Agency's plan for disposing of or de-identifying any PPI in its possession that no longer needs to be maintained for current use; and
 - 6) states that the notice may be amended at any time and that amendments may affect information obtained before the date of the amendment.
- Privacy Policy must be submitted within 6 months of release of Final Notice.
 - Policy must be implemented within 6 months of approval of CoC.
 - Privacy Policy must be posted on Lead Agency web page.
 - If a CHO maintains and provides the content of a public web page, the CHO must post the current version of its privacy notice on the web page.
 - A CHO and an HMIS Lead Agency must each develop and implement a plan to dispose of or de-identify PPI in its possession or control that is not in current use and is not required to be maintained under the HMIS Data and Technical Standards. Each plan must determine when PPI is considered to be no longer in current use and must take into account any statutory, regulatory, contractual, or other requirements for data retention. Each plan must balance any continuing value of PPI for research and other uses against the interest of clients in the disposal or de-identification of data no longer needed to provide services to clients. A CHO and an HMIS Lead Agency should coordinate disposal plans, but they may have different plans and different standards for the disposal of data.
 - Participation Agreements between Lead Agency and CHO must specify that written agreements are required for dealing with use of data for Research purposes.

Security Standards:

Reorganized and revamped.

New format of Standards is based on the HIPAA standards.

- Lead Agency must develop an HMIS Security Plan.
- HMIS Security Plan must be submitted within 6 months of release of Final Notice.
- Security Plan must be approved by CoC.
- Security Plan must be implemented within 6 months of approval of CoC.
- Lead Agency and each participating agency (CHO) must designate an official HMIS Security Officer. Names of each security officer must be documented in the Plan.
- Lead Agency must ensure that **background checks** are conducted on Lead Agency Security Officer and all administrative users with access to combined shared data.
- Lead Agency must **verify the technical competence** of every administrative user and security officers prior to granting administrative access to HMIS.
- Lead Agency must document the protocol for background checks and technical verification in the Security Plan

- *Lead Agency must implement a policy and chain of communication for reporting and responding to security incidents.*
- *Revised requirements for system access, background checks, system auditing, disaster recovery and wireless security.*
- *The Lead Agency must develop or be included in a broader CoC-wide Continuity Operations Plan or Disaster Recovery Plan.*
- *Lead Agency must have a security check list that is reviewed annually.*
- *Participating Agencies (CHOs) must obtain appropriate access agreements with all HMIS users and these access agreements must be part of the End User Agreements.*
- *Lead Agencies and CHOs must obtain documentation from vendors, contractors, sub-contractors attesting to their compliance with these Security Standards.*
- *Only software and hardware that are compliant with the HMIS security standards can be connected to or installed onto a system directly accessing HMIS. The process for determining the compliance of particular hardware or software must be documented in the security plan.*
- *The process for designating and appropriately protecting public areas must be documented in the security plan.*
- *Acceptable means of transmitting hard copy documents containing PPI, whether in bulk or individual client data must be described in the security plan.*
- *Disposal – storage medium must be reformatted at least 3 times before re-use or disposal.*
- *Details of back-up and back-up testing and restoration procedures must be included in the security plan.*
- *Inventory of all servers housing HMIS applications and data must be kept.*
- *Lead Agency must obtain and track certification that servers or data were disposed of in accordance with these standards.*
- *All procedures relating to User IDs automatic log-off of users after specified time, how a computer and location is authorized for HMIS access (?) must be documented in security plan.*
- *Outreach organizations may be defined in terms of geographic boundaries rather than specific addresses – secure boundary protection devices must be in place.*
- *Must be audit controls – Lead Agency must review audit logs on monthly basis and procedure documented in security plan.*
- *Software must automatically prepare audit report and Lead Agency must define what information must go into this audit reporting module. Must be documented in security plan.*
- *All PPI whether stored in HMIS database, on a workstation, server, mobile device, or any other storage device **must be encrypted**. The key sizes used for encryption must be documented in the security plan.*
- *Wireless access must be approved by System Administrator of HMIS. (numerous rules on wireless access)*

HMIS Application Standards (For Vendors):

All HMIS software used must be able to:

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- *Generate an unduplicated count*
- *Produce AHAR Table Shells*
- *Produce APRs*
- *Housing Inventory Reports*
- *Data Quality Reports*
- *Missing values report*
- *Bed utilization report*
- *Data timeliness report unduplication data quality report*
- *Support HMIS XML Schema or HMIS CSV standard. Be capable of importing and exporting data using at least one of the two technical formats (XML or CSV)*
- *Rigorously deter a user from creating a new client record where the record matches the data of a previously recorded client.*
- *Multiple matching options for de-duplication must ensure that no single missing or inaccurate field will prevent data matching.*
- *Must provide Lead Agency comprehensive documentation regarding method or algorithm used for de-duplication.*

Ray Allen
 Executive Director
 Community Technology Alliance

September 26, 2008

