



***THE PALM BEACH COUNTY  
CLIENT MANAGEMENT  
INFORMATION SYSTEM  
(CMIS)***

**POLICIES & PROCEDURES**

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## **1. PURPOSE**

This document provides the policies, procedures, guidelines, and standards that govern the Palm Beach County Client Management Information System (CMIS). CMIS staff will provide each CMIS Partnering Agency, hereafter referred to CMIS Member Agency, with a copy of this document. As a condition of participation, each CMIS Member Agency is mandated to adhere to all policies within the document as signed in the CMIS Agreement of Understanding.

The purpose of Palm Beach County's CMIS is to:

- Improve the level of service to clients by reducing duplication of information and focusing on referrals and contacts with appropriate agencies.
- Maximize agency resources by increasing communication among the staff of Member Agencies by broadening knowledge of available community resources.
- Provide quality data for planning information related to community needs, service gaps, outcome measures and service utilization.
- Provide longitudinal data to allow for easy construction of accurate reports, to assess the trends, needs and services of Palm Beach County clients.
- Conform to all HUD requirements, policies and regulations.
- Conform to all applicable state and local government requirements.

## **2. HISTORICAL PERSPECTIVE**

In 1992 United Way of PBC established a DOS-based database system. This system, called the Client Service Network, was intended to track and assist clients and client services, and then report on the services and actual operation of the system. Over time, there was recognition that this system could not accommodate the growing number of users and the varied informational needs required for planning.

In May of 2002 The State of Florida's Department of Children and Families Office on Homelessness allocated \$250,000 to implement a Client Management Information System (CMIS). A committee chaired by members from the United Way of PBC, local funders and the COC selected ServicePoint, a web based application, to track homeless services and 'people in peril' in Palm Beach County. At that time, seven years of client data was migrated into ServicePoint from the Client Service Network. As part of this migration client information was stored on a server in a secure and locked facility accessible only via ServicePoint software.

In October 2014, Palm Beach County assumed the responsibility of administering CMIS at the request of the Homeless and Housing Alliance members.

### **3. CMIS SYSTEMWIDE GOALS**

- **Provide Data on the Extent and Nature of Homelessness** – The first goal is to inform public policy makers about the extent and nature of the homeless population in Palm Beach County, Florida. This is accomplished through analysis of homeless client and service provider data. CMIS is capable of producing an unduplicated count of those accessing services, service trends, bed utilization rates, bed coverage rates, service volume coverage rates, unmet needs, recidivism rates, and CMIS system usage. All data is provided in an aggregated (void of any identifying client level information) format and made available to public policy makers, service providers, advocates, and consumer representatives. Data may also be used to access the effectiveness and efficiency of Member Agency programs.
- **Streamline the Intake and Referral Process for Member Agencies** – The second goal is to streamline the intake and referral process for Member Agencies in Palm Beach County, Florida. CMIS provides a standardized mechanism for collecting client information across all providers. As part of the system, a Member Agency can send an electronic referral to another Member Agency. This streamlined process allows for the development of centralized in-take centers where clients could get assessed, appropriately referred to programs, and followed through as they travel through the system through one shared information system.
- **Provide for In-depth Case Management by Sharing Client Information** – The third goal is to allow for in-depth case management through the sharing of client information in a centralized system. CMIS provides a standardized mechanism in which Member Agencies collect information and then share it among other Member Agencies to better assist clients and be able to target the root of the problems.
- **Inventory Homeless Housing** – Finally, the fourth goal is to inventory homeless housing and track its usage in Palm Beach County. CMIS captures this inventory and allows for real-time collection and tracking of shelter availability in Palm Beach County. As Case Managers are making referrals, they will be able to check which providers have housing beds/units available to refer clients. They can also check the system for referrals made to their programs for easy intake.

## **4. CMIS ADMINISTRATIVE AGENCY**

### **4.1 ROLES & RESPONSIBILITIES**

Palm Beach County has been designated by the Palm Beach County Continuum of Care as the Client Management Information System Lead Agency. As the CMIS Lead Agency, Palm Beach County's role is to provide training and technical support to the Continuum of Care and CMIS Member Agency providers. CMIS staff coordinates and participate in numerous projects annually regarding data collection and performance measurement.

Software System – CMIS has sole responsibility for all communication with the vendor on system wide software issues and problems as well as submitting future enhancement requests of the COC.

- **User training** - CMIS staff is responsible for all end user training. This is to ensure continuity and consistency with training as well as ensuring the proper work flow for CMIS Member Agencies is properly taught and followed.
- **End User Security Setting** – The CMIS staff will assign the security level of every end user based on the agreed upon security settings established by the Member Agency at the Initial CMIS site visit.
- **Technical support** - CMIS staff is responsible for providing technical support as it relates to the software or project to Agency Administrators and End Users. Technical support services attempt to help the user solve specific problems with operating issues but do not include in-depth training, customization, reporting, or other support services.
- **Data quality initiatives** - Together with Member Agencies, CMIS staff works diligently on monitoring data quality standards in order to ensure that reports both at the provider level and the system level are complete, consistent, accurate, and timely.
- **System-wide reporting** - CMIS staff train CMIS Member Agencies on how to access and run reports on the data they contribute to the CMIS. Additionally, reports are provided to local community planners monthly and to Statewide and National partners quarterly and annually. This data is in an aggregate format and details the trends on how clients are being served in Palm Beach County.
- **Performance Measures** - Providing data to the COC to enable them to access the performance of Member Agency programs.
- **License administration** – CMIS staff is responsible for the issuance, revocation and monitoring use of system licenses. They also oversee the administration of license fees.

## 4.2 REQUIRED REPORTING

The Palm Beach County Client Management Information System (CMIS) coordinates and/or participates in numerous reports annually regarding data collection and reporting. Below is a sample list of reports in which CMIS is involved in:

- **Annual Homeless Assessment Report (AHAR)** – The Annual Homeless Assessment Report (AHAR) is submitted to the Department of Housing and Urban Development (HUD) who presents the data in a report to the U.S. Congress detailing the extent and nature of homelessness in the United States. It provides counts of the homeless population and describes their demographic characteristics and service use patterns.
- **Emergency Food and Shelter Program (EFSP)** – These funds originate from the Federal Emergency Management Agency (FEMA), but are overseen by a National EFSP Board. The Emergency Food and Shelter Program (EFSP) is a national program that provides additional funds to existing shelters, food pantries, soup kitchens and financial assistance providers.
- **Housing Inventory Chart (HIC)** – The Housing Inventory Chart (HIC) is an annual report submitted to the Department of Urban Development (HUD) that lists all homeless emergency, transitional, safe haven, shelter plus care, and permanent supportive housing beds in our Continuum of Care and how they were used over the reporting period.
- **State of Florida Department of Children and Family Services Office on Homelessness Grants- Challenge Grant and TANF Grant TANF (Temporary Assistance for Needy Families)** Homelessness Prevention Grant program, pursuant to section 414.161, Florida Statutes, for families with minor children who are at risk of losing their housing and becoming homeless due to a financial or other crisis. Assistance is available to pay past due rent, mortgage or utility bills for up to four (4) months. The **Challenge Grant program** is authorized by section 420.622(4), Florida Statutes, to provide grant funding to lead agencies for homeless assistance Continuums of Care (CoC). The Challenge Grants must be used to assist to implement a written plan for addressing the needs of the homeless populations. The grant funds are to provide programs, services, or housing providers support. Monthly reports will be generated as well as a final report at the completion of the grant period.
- **Financially Assisted Agency Reports-** For those non-profit agencies that receive local Ad Valorem funds to serve homeless individuals and families monthly data reports will be generated as well as a final report at the completion of the contract period.

- **Homelessness Pulse** – The Homelessness Pulse is a quarterly report similar to the AHAR that provides real-time information on service usage and trends to the Department of Housing and Urban Development.
- **Homeless Point in Time (PIT)** – Bi-annually our Continuum of Care counts and surveys the homeless client population on a given day and submits the data to local, State and Federal Government entities and other community planners. This data is used to estimate the number of homeless in our community and allocate funding based on those estimates.
- **Projects for Assistance in Transition from Homelessness (PATH)** – is a program funded by SAMHSA (Substance Abuse and Mental Health Services Administration). PATH programs provide services to people who are experiencing mental illness and homelessness or risk of homelessness. An annual report is submitted to SAMHSA.
- **Emergency Solutions Grant (ESG)** - Designed as the first step in the Continuum of Care, the Emergency Solutions Grants (ESG) provides funds for emergency shelter outreach, transitional housing, Rapid Re-Housing and homeless prevention. An annual report is submitted to HUD on these activities.
- **Veteran Administration (VA) Bed Programs** – The VA provides funding for the VA grant Per Diem, VA contract and VASH programs. Each program has different reporting requirements.
- **The Supportive Services for Veteran Families Program (SSVF)** – a VA program that awards grants to private non-profit organizations and consumer cooperatives who provide supportive services to very low-income Veterans and their families residing in or transitioning to permanent housing. The grantees provide a range of supportive services designed to promote housing stability.
- **Continuum of Care Performance Data Reports** – data is utilized by the COC to assess Member Agency's program effectiveness, efficiency and overall performance against a predetermined set of targets.



## **5. CMIS MEMBER AGENCY**

### **5.1 ROLE AND RESPONSIBILITIES**

CMIS Member Agency is the term given by the CMIS staff to reference participating health care and/or human service providers who actively enter data into the Palm Beach County Client Management Information Network (CMIS). A qualified CMIS Member Agency is required to sign and abide by the terms of the CMIS Member Agency Agreement and the CMIS Policies and Procedures.

Any agency or governmental organization that provides a health and human service may qualify to participate in CMIS. To participate in CMIS, Member Agencies must sign and agree to abide by the terms of the CMIS Member Agency Agreement. They must also abide by the policies and procedures outlined in this document as well as the End User Agreement and purchase a license for each end user.

All Member Agencies receiving funding from the United States Housing and Urban Development Department (HUD), the United States Department of Veteran Affairs, the United States Department of Health and Human Services, the United States Department of Homeland Security, the State of Florida's Department of Children and Families office on homelessness and local ad valorem funding may be mandated to participate in CMIS by contract. Victim service providers and legal service providers that are recipients of funds requiring participation in CMIS and do not directly enter data into CMIS, must use a comparable database. A comparable database allows the collaborative applicant and Continuum to obtain the aggregate data needed while respecting the sensitive nature of the client-level information if it complies with all CMIS data, technical, and security standards. For others, participation is voluntary, but strongly encouraged.

### **5.2 CMIS MEMBER AGENCY AGREEMENT**

The CMIS Member Agency Agreement must be signed by a legal authorized representative of each CMIS Member Agency. The CMIS Member Agency Agreement is a contract between the CMIS Member Agency and Palm Beach County regarding specific CMIS guidelines and use. This contract outlines specific details regarding Member Agency's involvement including, but not limited to, the areas of confidentiality, data entry, security, data quality and reporting.

#### **PROCEDURE FOR EXECUTION:**

- The Agency's Executive Director (or legally authorized officer) will sign two copies of the CMIS Member Agency Agreement and mail them to Palm Beach County.
- Upon receipt of the signed agreement, both will be signed by the Palm Beach County.

- One signed copy of the CMIS Member Agency Agreement will be filed with Palm Beach County. One signed copy will be mailed back to the CMIS Member Agency.

### **5.3 EXECUTIVE USER**

A member agency may choose to request a license for an upper level executive who will use the CMIS database primarily for quality control and reporting. This user is exempt from the inactivity requirements.

### **5.4 AGENCY GRIEVANCE**

A CMIS Member Agency has the right to file a grievance with the CMIS staff about any other CMIS Member Agency related to violations of access in CMIS, violations of CMIS policies and procedures, or violations of any law. Any grievance must be in writing to the Program and Contract Manager of Palm Beach County Division of Human Services. The Program Manager will:

- review the grievance
- gather additional information necessary from the grieving agency and the agency against whom a grievance is filed
- make recommendations, if any, necessary within 60 days of the receipt of the the grievance to the Director of Human Services.

Recommendations could include but not be limited to referring any violations to the appropriate authority.

## **6. CMIS MEMBER AGENCY ADMINISTRATOR**

### **6.1 ASSIGNING AN AGENCY ADMINISTRATOR**

Each Member Agency will assign an Agency Administrator who acts as the operating manager/liaison over the CMIS system at the CMIS Member Agency. They are the centralized contact for the CMIS staff, coordinate CMIS activities for their organization and are the first line of defense for technical assistance to their users. Each Member Agency will also assign a back-up Agency Administrator to act in absence of the Agency Administrator. This role is vital to the success of CMIS at the CMIS Member Agency locations to ensure that the data is entered in a timely manner, the quality of the data is continuously monitored, and communication and support between CMIS and the CMIS Member Agency is streamlined.

#### **PROCEDURE:**

The Executive Director (or legal authorized officer) of the Agency will assign these positions to specific staff persons by completing the Agency Administrator Agreement and submitting it to the CMIS Coordinator. In the event of a change of Agency Administrator, the Executive Director will inform the CMIS Coordinator within 24 hours of the change and complete a new agreement.

### **6.2 ROLES AND RESPONSIBILITY**

The Agency Administrator acts as the operating manager/liaison over the CMIS system at the CMIS Member Agency. They are responsible for ensuring that CMIS Policies and Procedures are adhered to. This includes but it not limited to:

- Communicating and authorizing personnel/security changes for CMIS End Users to CMIS Staff within 24 hours of a change.
- Submitting requests for new licenses to CMIS no later than 72 hours before a scheduled training date.
- Scheduling/Authorizing CMIS End User Training.
- Informing CMIS Staff of all program changes (eg. bed additions or deletions, new program services, bed types) within at least 5 business days prior the change in order to update the system for accurate data entry.
- Ensuring client privacy, security, and confidentiality policies are adhered to
- Ensuring data collection, entry and quality standards are met.
- Responding to CMIS data quality questions within 5 business days.
- Correcting client data in CMIS within 3 business days of notification of data errors.
- Attending at least one Agency Administrator Training and Level 1 Training.
- Attending all CMIS required meetings and conference calls.
- Acting as the first tier of support for CMIS End Users.

- Ensuring a basic competency with running CMIS system reports and have an understanding of system wide data quality reports.
- Ensuring Agency and all users are using the correct CMIS related forms and following the most current CMIS procedures and work flow.
- Ensuring the CMIS Privacy Notice is posted in a visible area of the Agency and communicated in a language understood by clients.
- Assisting with CMIS projects as needed (AHAR, PIT, EHIC, and Pulse).

## **7. CMIS MEMBER AGENCY DATA SECURITY OFFICER**

### **7.1 ASSIGNING A DATA SECURITY OFFICER**

Each Member Agency will assign a Data Security Officer who oversees the integrity of the agency's security policies. They will liaise with the CMIS Data Security Officer. Member Agencies may elect to choose the Agency Administrator as their Security Officer.

In the event of a change of Data Security Officer, the Executive Director will inform the CMIS coordinator within at least 5 business days prior to the change and complete a new agreement.

### **7.2 ROLES AND RESPONSIBILITIES**

The Agency Data Security Officer oversees agency security policies. They are responsible for:

- Submitting Agency security plan as it relates to CMIS.
- Ensuring that end users complete security training annually.
- Reporting security breaches to CMIS lead Agency.
- Ensuring each End User completes required background checks.
- Completing an annual security review and report results to CMIS Lead Agency.

## **8. CMIS END USER**

### **8.1 CMIS END USER**

A CMIS End User is any user who has an active license to CMIS. End Users are bound by inactivity requirements.

### **8.2 COMPETENCY/SKILLS**

All End Users are required to have minimum set of basic computer competency/skills to adequately perform their data entry roles in CMIS. Each CMIS Member Agency Administrator must meet the skill requirements set forth in initial training. All other End Users must have basic computer competency/skills to adequately be able to use and navigate CMIS. Users will be evaluated for competency at the beginning of training. Users who do not have a minimum competency will be asked to leave training and seek basic computer competency classes. Basic computer competency classes can be found at a local library, community center, college, or business learning center. Once the user has completed these classes, they can register and attend CMIS training. Upon return, they will be required to produce proof of attendance at any classes attended.

### **8.3 AFFIDAVIT OF GOOD MORAL CHARACTER**

All end users must complete and have notarized the Affidavit of Good Moral Character.

### **8.4 BACKGROUND CHECKS**

The COC recommends as best practice that all End Users should have had a background check prior to being assigned access to CMIS. Background checks that are returned with a criminal history should be carefully considered by the Member Agency's Executive Director prior to giving them access to client information, particularly any criminal history which could impact the security of the CMIS system

### **8.5 FORMER CMIS CLIENT END USERS**

Any prospective End User who was a previous client of the CMIS system should be carefully considered by the Member Agency's Executive Director prior to giving them access to client information.

### **8.6 LAW ENFORCEMENT EXCLUSION**

To protect current clients who may be accessing health and human service programs from harassment or harm, active members of law enforcement or Detention and Corrections staff will not be granted access to CMIS. Limited exceptions may be negotiated and an agreement executed for agencies directly involved in an active homeless jail diversion and/or prison release program. Any agreement with exceptions must include a statement that: CMIS use is (1) limited to the purpose for which it was intended; and (2) is only for work with program involved clients.

Former members of law enforcement who are employed at a homeless service provider post-law enforcement career may have access to CMIS if it is imperative to their new responsibilities.

### **8.7 END USER AGREEMENT**

End users must sign and adhere to an End User Agreement. This document outlines the role and responsibility of having and maintaining their access in CMIS. To ensure accurate and quality data the End User will adhere to the timeframe in the agreement for data entry. All End Users are provided a software license and training through the CMIS staff prior to entering or accessing client data in CMIS.

### **8.8 REMOVING A USER LICENSE**

Requests for removal of a license by a CMIS Member Agency can only come from the Agency Administrator or Executive Director and the request must be submitted in writing. All license requests should be communicated to CMIS within 24 business hours after the end user has left the employment of the CMIS Member Agency, the end user has changed positions and is no longer in need of CMIS access, or has knowingly breached or is suspected of a system breach where client data has been compromised.

### **8.9 REMOVING A USER LICENSE**

CMIS reserves the right to inactivate or delete the license for any End User for cause.

## **9. CMIS CLIENTS**

### **9.1 CLIENT CONSENT / RELEASE OF INFORMATION**

A CMIS Member Agency must obtain written consent from all clients for whom they are entering or accessing client data into CMIS. The CMIS Member Agency will obtain this written consent. CMIS End Users will explain the release of information form in a language the client understands using the standard Informed Consent / Release of Information form. A signed original copy should be placed in each client's file.

Clients have the right to refuse any or all questions they consider sensitive. The form must be completed by each member of the household receiving services who is 18 years of age or older. The head of the household may sign for any children or members of the household under the age of 18 on the same form. A court appointed legal guardian must sign for an adult deemed incompetent by the courts.

### **9.2 CLIENT ACCESS TO INFORMATION**

All clients entered into CMIS have a right to obtain a copy of their electronic file contained in CMIS.

Clients can request a copy of their information in writing to the Member Agency through email or regular mail.

### **9.3 THIRD PARTY REQUEST FOR CLIENT INFORMATION**

CMIS and CMIS Member Agencies may consider and respond to third party requests for client information, only after obtaining client consent.

CMIS will only provide information to law enforcement related to evidence and information concerning a criminal matter only pursuant to a Court Order.

### **9.4 CLIENT GRIEVANCE**

Clients have the right to file a grievance with the CMIS staff about any CMIS Member Agency related to violations of access in CMIS, violations of CMIS policies and procedures, or violations of any law.

CMIS staff will request that a client fill out a CMIS Client Grievance Form which can be obtained by contacting the CMIS staff by phone, email or regular mail. A client has the right to file a grievance with the CMIS staff about any CMIS Member Agency or CMIS End User related to violations of access in CMIS, violations of CMIS policies and procedures, or violations of any law. Any grievance must be in writing to the Program and Contract Manager of Palm Beach County Division of Human Services. The Program Manager will review the grievance and gather additional information necessary from the client and the agency/user against whom a grievance is filed, and will make recommendations, if any, necessary within 60 days of the filing of the grievance to the



Director of Human Services. Recommendations could include but not be limited to referring any violations to the appropriate authority.

#### **9.5 REVOKING AUTHORIZATION FOR CMIS DATA COLLECTION**

All clients who initially agree to participate in CMIS have the right to rescind their Release of Information for any future data input in CMIS with the exception of those who have been entered into a financial assistance program.

Clients who choose to rescind their permission must do so in writing to the Member Agency. The Agency Administrator will immediately inform CMIS staff. Information already in the system that was entered under a previous Release of Information form can be maintained in the system and does not have to be closed. The letter revoking authorization should be kept on file by the Member Agency. Any future data entry requires the execution of a new Release of Information form.

## **10. CMIS SYSTEM SECURITY**

### **10.1 MINIMAL TECHNICAL REQUIREMENTS**

All CMIS End User workstations must meet minimum technical requirements as specified below in order for CMIS to be functional and to meet the required security specifications. CMIS works with all operating systems.

- Hardware: Memory: 4 Gigabyte recommended, (2 Gigabyte minimum) Monitor: Screen Display - 1024 by 768 (XGA)
- Processor: A Dual-Core processor is recommended.
- Internet Connectivity: Broadband Internet Connectivity recommended (High Speed Internet).

Authorized Browsers:

- Firefox 3.5 or greater (MINIMUM LEVEL OF SECURITY PROTECTION/MALWARE)
- Internet Explorer 8.0 or greater
- Safari 4.0 or greater
- Google Chrome 5.0 or greater
- Anti-malware applications will be used to protect the users computer from malware infections and attacks. All desktop and laptop computers, servers and applicable devices used to access the CMIS system must have current versions of software applications designed to detect malicious software.
- The agency security officer will be responsible for verifying as having up-to-date anti-virus protection prior to allowing the device to access the CMIS System. All individuals accessing CMIS System must not disable or disrupt the operation of anti-virus protection on any device. Nor should they in any way engage in practices that would introduce malicious software into the users computing environment either directly or through data exchanges and transfers.

### **10.2 WORKSTATION MAINTENANCE**

- Workstations should have their browsing history refreshed on a regular basis to allow for proper speed and functionality.
- Workstations should continue to be updated to the most current version of Java, as suggested by their software.

### **10.3 CONFIDENTIALITY**

CMIS Member Agencies will not breach system confidentiality by misusing CMIS data. CMIS data is not to be used for any purpose outside the use of program evaluation, education, statistical and research purposes.

### **10.4 DISCLOSURE AND NON-SOLICITATION**

CMIS Member Agencies shall not use any data within CMIS to solicit clients, organizations or vendors for any reason.

At no time shall confidentiality of clients, organizations and vendors be violated by disclosing client information to non-members. Data in CMIS will not be used to solicit donors, volunteers, sponsorship, or employees of any type. This information must not be sold, donated, given, or removed from CMIS for any purpose that would violate client, organization, or vendor confidentiality or put them at harm or risk.

### **10.5 SALE OF DATA**

CMIS Member Agencies shall not sell, donate or give client, organization or vendor information.

### **10.6 VIOLATION OF TERMS**

Those found in violation of these stated security policies will have their access to CMIS immediately terminated and the violation disclosed to local government and funding entities if applicable. Violation or breeches in HIPAA and 42 CFR regulations may include fines and jail time.

### **10.7 END USER INACTIVITY**

An End User must successfully log-in within 5 business days after the initial training date and allow no more than 30 days between log-in sessions on the live site to keep their license active. Any End User who is non-compliant will have their access inactivated by CMIS staff and the user will be required to attend re-training prior to regaining access. A user inactivity report is generated monthly and shared with the Agency Administrator. This report will help the Agency Administrator to monitor end user activity. A user inactivity report may also be shared with local government entities, and other community planners if applicable. Any program that anticipates being inactive for more than 30 days should notify Palm Beach County to make other accommodations.

### **10.8 REGULATION COMPLIANCE**

The Palm Beach County Client Management Information System (CMIS) complies with all federal, state, local laws, standards, and regulations. It is imperative that Member Agencies have policies and procedures in place that ensure compliance with applicable laws and regulations that govern their programs.

**HIPAA Covered Entities.** Any Agency that is considered a “covered entity” under the Health Insurance Portability and Accountability act of 1996, 45 C.F.R., Parts 160 & 164, and corresponding regulations established by the U.S. Department of Health and Human services is required to operate in accordance with HIPAA regulations. More information about 45 C.F.R. may be found at: <http://www.hhs.gov/ocr/privacy>

**42 CFR Part 2 Entities.** Any Agency that is considered a “covered entity” under 42 C.F.R. Part 2, and corresponding regulations establishing by the U.S. Department of Health and Human Services is required to operate in accordance with the corresponding regulations. More information about 42 C.F.R. may be found at: [http://www.access.gpo.gov/nara/cfr/waisidx\\_02/42cfr2\\_02.html](http://www.access.gpo.gov/nara/cfr/waisidx_02/42cfr2_02.html)

**Domestic Violence (DV) Shelters.** Any agency that is a victim service provider is barred from disclosing identifying information to HMIS as of 2007. More information about DV Shelters and HMIS may be found at: <http://epic.org/privacy/dv/hmis.html>

**Other Entities.** Any Agency that is NOT considered a “covered entity” under any of the above mentioned programs is required to operate in accordance with HMIS/CMIS privacy and security rules, as well as any applicable federal, state, local laws and regulations. More information about HMIS Privacy and Security Rules may be found at: <http://www.hmis.info/Default.aspx?classicAsp=resources.aspQStringcvid=234^ccid=1>

## **10.9 PRIVACY POSTING**

By law, CMIS Member Agencies are required to post the CMIS Privacy Notice that discloses collection and use of Client Information. CMIS Member Agencies are required to provide a copy of the CMIS Privacy Notice to all clients upon request by the client.

## **10.10 PROTECTION OF INFORMATION**

The Palm Beach County CMIS has implemented extensive technical and procedural measures to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data as recommended in the HMIS Data and Technical Standards.

Palm Beach County has and will continue to be in compliance with these Privacy and Security Standards even while not being considered a HIPAA covered entity as the CMIS Lead Agency.

## **10.11 SERVER SECURITY**

The location of the server is in a controlled hosting environment providing security from data loss and theft.

The Palm Beach County CMIS contracts with a HUD approved software vendor to provide HMIS to the Continuum of Care. As a web based HMIS solution, the HMIS software and data-bases are hosted on secure servers in a highly secure computer room accessible only by employees who are responsible for maintaining and supporting the system. The vendor computers are also protected by firewalls to prevent unauthorized external access.

## **10.12 USER SECURITY**

The CMIS System is constructed to offer a dynamic range of levels of security based on the needs of the agency and End User. As a default, End Users will only have enough security access to perform their normal job duties. End Users gain and retain system access through a user authentication process via their internet web browser.

The CMIS database is accessed through a confidential URL, which is not available or published outside the Palm Beach County Continuum of Care Community. Each user must use a valid user sign on and dynamic password. All user names and initial temporary passwords are issued by CMIS staff only. Passwords expire every 45 days and users are prompted for new dynamic passwords. Additionally, after three failed log in attempts, user ID's and passwords automatically become inactive and users must contact an Agency Administrator or CMIS staff for re-activation. Passwords are always encrypted and can never be seen in clear text.

## **10.13 DATA SECURITY**

The Palm Beach County CMIS secures data as it is traveling over the internet and stored on the centralized server by providing encryption for all data.

All CMIS transactions are fully encrypted using Secure Socket Layer (SSL) with 128 bit encryption. This is the highest commercially available encryption level and is the same as used by financial Institutions. This encryption is indicated by the CMIS web address beginning with the letters HTTPS.

## **10.14 SYSTEM ACCESS**

The Palm Beach County CMIS staff, in conjunction with the CMIS Member Agency Administrator, ensures that all End Users have access to the components of the system appropriate for their level of data usage.

Each CMIS End User is assigned a security level in their user profile that grants them access to only the areas they need to accurately do their work. A change to the level of system security for an end user may only be requested by an Agency Administrator or Executive Director for which the end user works.

## **10.15 AUDIT TOOLS**

The CMIS software has built-in audit trail applications that allow CMIS system administrators to audit the use and access of data. Audit reporting is an integral part of maintaining system security protocols and is performed on a scheduled basis. These audit trail tools ensure system oversight and can be used to investigate privacy or security breaches or filed client grievances.

## **10.16 DEFAULT SECURITY SETTINGS**

The CMIS system utilizes a set of Visibility Settings that allow sharing of only agreed upon data elements among the participating CMIS Member Agencies. These Visibility Settings allow for the sharing of the most useful data while denying sharing of protected

data. These denials are based upon federal, state, or local laws and guidelines, and by agreement with each CMIS Member Agency.

Pursuant 42 and 45 CFR notwithstanding, CMIS is an open or shared HMIS system. The default Visibility Settings for clients will be set to OPEN for all CMIS clients that are not registered or receiving services from any 42 or 45 CFR facility or program. If client is enrolled in a 42 or 45 CFR covered entity program, program visibility settings will be set in accordance to applicable laws.

System Visibility Settings may only be changed by the CMIS staff and requests to change Visibility Settings must be made via written request to CMIS staff.

### **10.17 DATA ARCHIVING**

CMIS staff, in consultation with the COC Executive Committee and following any HUD recommendations, will determine appropriate time limits for data archiving. Data will never be destroyed.

## **11 CMIS TECHNICAL SUPPORT**

### **11.1 HELP DESK**

The Palm Beach County CMIS staff provides a free technical help desk that will allow End Users to email or telephone in requests for technical assistance, work flow questions, and data quality assistance.

During normal business hours, requests for technical assistance will be answered on an on-demand basis. CMIS staff will return calls and emails within 24 hours of receipt.

After hours and weekend requests will be treated as if the request was received at opening of the next business day. CMIS staff normal working hours for Technical Assistance are Monday through Friday, 8:00 am. through 5:00 pm. For after-hour requests, please contact your Agency Administrator.

### **11.2 SYSTEM ENHANCEMENTS**

The Palm Beach County CMIS staff will submit to the CMIS software vendor all feature enhancement requests submitted through the proper channels from Agency Administrator(s) or End Users.

### **11.3 QUARTLERLY MEETINGS**

The Palm Beach County CMIS staff will hold quarterly mandatory meetings with Agency Administrators to discuss system changes and provide technical support.

Annually two quarterly conference calls and two in-person meetings will be scheduled. Agendas will include submitted requests for agenda or discussion. Agency Administrators should submit agenda items no later than 2 weeks prior to the meeting. All information, including agenda and instructions, will be sent to agency administrators via email 48 hours before the meeting. All attendance records are open to review by local government entities and other community planners.

## **12 CMIS SECURITY VIOLATION POLICIES**

### **12.1 CORRECTIVE ACTION**

If a CMIS Member Agency or any of its End Users has violated any CMIS policy, the CMIS Staff will implement an action plan upon discovery of the violation.

If a violation is discovered, it is the role of the CMIS staff to swiftly respond in order to prevent further violations from occurring or the current violation from harming clients or other CMIS Member Agencies. The CMIS staff will determine a course of action depending on the type and the severity of the policy violation.

### **12.2 PROCEDURE IN EVENT OF VIOLATION**

**CRITICAL SECURITY RISK** (Which includes such risks as: Security Breach, imamate risk to clients, Unresolved Data Quality Errors):

- CMIS Coordinator will suspend all CMIS Member Agency Active End User Licenses. Affected End Users will be suspended until retrained.
- CMIS Coordinator immediately reports the violation to the Division Director of Palm Beach County Human Services.
- CMIS Coordinator / Division Director of Palm Beach County Human Services will contact the CMIS Member Agency in question to discuss the violation and course of action.
- CMIS Member Agency will be suspended until violation resolved and placed on probation for 90 days.

**MEDIUM SECURITY RISK** (Which includes such risks as: Grievance has been filed against CMIS Member Agency or general complaints that threaten or endanger clients):

- CMIS Coordinator immediately reports to the Division Director of Palm Beach County Human Services to discuss the course of action and plan.
- The Division Director of Palm Beach County Human Services and/or CMIS Coordinator may also contact the CMIS Member Agency to discuss violation and review action plan.
- CMIS Member Agency may be placed on probation for 90 days and possible suspension until violation resolved.
- If appropriate, CMIS System Administrator may suspend all CMIS Member Agency End User Licenses.



**LOW SECURITY RISK** (Which includes such risks as: Unresponsive CMIS Member Agency to CMIS Requests, Ceased Data Entry, Incorrect Bed List, End User Inactivity, and Timeliness Issues):

- CMIS Coordinator immediately reports to the Division Director of Palm Beach County Human Services to discuss the course of action and plan.
- The Division Director of Palm Beach County Human Services and/or CMIS Coordinator will contact the CMIS Member Agency in question to discuss the violation and course of action.
- If appropriate, CMIS Member Agency may be placed on probation for 90 days or until violation is resolved.
- If appropriate, CMIS Coordinator may suspend all or some of the CMIS Member Agency End User Licenses in question.

### **12.3 POTENTIAL COURSES OF ACTION**

#### **Probation**

The CMIS Coordinator will notify the Agency's Executive Director and CMIS Agency Administrator in writing to set up a one-on-one meeting to discuss the violation in question. During the meeting, an action plan will be developed and documented with relevant time frames set to correct actions. If a training issue is identified, the CMIS Coordinator will coordinate further follow up with the End Users in question. The Member Agency will be placed on probation for 90 days, where monitoring and auditing may be required and performed regularly during this period. Notification of probation will be communicated to any relevant funding entities.

#### **Suspension**

If a violation is of critical security risk or the corrective measure(s) are not achieved in the probationary period or more CMIS violations occur during the probationary period, the CMIS Administrator will suspend their access to CMIS until the issues are resolved. A written notice of suspension will be sent to Member Agency's Executive Director, giving reasons and effective date. During the suspension period a mandatory meeting will be held between the Member Agency Executive Director, Division Director of Palm Beach County Human Services, CMIS staff and any relevant funding agencies, if appropriate, to discuss suspension and requirements for resolution. All meeting deliverables will be documented in writing and must be achieved within the set suspension period.

### **Termination**

If the Member Agency violates any policies deemed a critical security risk and fails to achieve resolution within the suspension period, the CMIS staff will permanently terminate the Member Agency from CMIS. The CMIS Member Agency will receive a written notice to the Executive Director of the termination, reasons and effective date. Notification of the termination will be sent to relevant funding agencies. In the case there is data quality costs, transfer costs or license costs, the Member Agency must assume responsibility for payment.

### **Removal of User License**

CMIS reserves the right to inactivate or delete the license for any End User for cause. In all cases where a licensee is removed for cause, the assigned CMIS Member Agency Administer and Executive Director will be notified immediately via email with the stated cause of license removal. There will be no refunds for licenses removed for cause. Reasons that a licensee would lose their license or otherwise have their license temporarily inactivated or revoked would include, but not be limited to:

- Multiple failed log on attempts in the same day.
- A consistent lack of good data quality.
- Failure to complete the training test assignment within the 5 day period post training.
- Three consecutive no call, no shows to scheduled training.
- Failure to log on to system at least once in a consecutive 30 day period.
- Sharing system credentials (log in and password) with any other party.
- Allowing non-authorized users to view any data from, have access to, see the screens of, or be provided any print outs of client data from CMIS.
- Other violations of CMIS Policies.
- Other serious infractions that result in a compromise of the CMIS Member Agency and/or any client level data in the system.

## **13 CMIS TRAINING**

### **13.1 CMIS TRAINING DESCRIPTIONS**

The Palm Beach County CMIS offers the following training opportunities:

- Agency Administrator Training (Mandatory for Agency Administrators) to include CMIS Data Quality and Basic Reporting
- CMIS Basics (Mandatory for all Users)
- CMIS Ad Hoc Reporting

### **13.2 AGENCY ADMINISTRATOR TRAINING**

**Prerequisite:** Completion of CMIS Basic Training and CMIS Agency Administrator Designation form signed by the Executive Director/Chief Executive Officer.

**Description:** This training is specialized to teach the Agency Administrator how to manage their CMIS data, what expectations are required in holding the role of Agency Administrator, how to communicate with CMIS staff, how correct client data entry errors, and how to utilize technical tools to assist them in their role. This training will also focus on data quality basics and the canned reports in CMIS. Reports will include: Client Served Report, Daily Unit Report, Exit/Entry Report, Outstanding Referral Report, and Service Transaction Report.

### **13.3 CMIS Basics**

**Prerequisite:** Proof of basic computer competency or proof of attendance in a basic computing course. A CMIS End User License Form must be on file within 72 hours of the training date before users may attend.

**Description:** During CMIS Basic Training, users will begin by learning the privacy and ethics requirements of working in CMIS including: user name and password protection, viewing, entering, printing, and storing client information. Users will begin learning the basics of CMIS for their security level. The following forms will be reviewed: the CMIS End User Agreement, CMIS Informed Consent, CMIS Privacy Notice and CMIS Intake Form.

### **13.4 CMIS Ad Hoc Reporting**

**Prerequisite:** CMIS Basic Training and Agency Administrator Training

**Description:** This training provides basic information to users on how to develop and run Ad Hoc data reports. The training will be focused on where the data is located and how to connect the data to a report.

## **14 DATA COLLECTION PROCESS**

### **14.1 DATA QUALITY**

Data quality is vitally important to the success of the Palm Beach County Client Management Information System (CMIS). Together with the Continuum of Care, CMIS Member Agencies and CMIS staff will work diligently on adhering to data quality standards. Adherence to set data quality standards will help bring additional funded dollars into our community as well as ensure our data reflects our communities level of service when reported locally, Statewide, or Nationally. The COC Data Quality Measures will be evaluated on accuracy, completeness, consistency, and timeliness. This data will be used to review the Continuum of Care's progress towards meeting its indicators. Data quality reports will be issued monthly to member agencies and published quarterly on the COC website.

### **14.2 CLIENT DATA**

All client data entered into CMIS by the Member Agency should be that of clients receiving services and/or its current household.

Data on all members of the family should be entered individually, but tied together as a household.

The head of household can give consent for all minor children (under 18 years of age) in a family but cannot give consent for any adult members (18 and over). All adults must give their consent individually. Minors under the age of 18 or adults deemed incompetent by the courts should not be entered into the system without consent from a legal guardian.

### **14.3 DATA STANDARDS**

The Palm Beach County CMIS requires each CMIS Member Agency to enter client level data based on a set of predefined data standards based on the most current revision of the HUD Homeless Management Information System (HMIS) Data Standards. Every program entering into CMIS must adhere to the requirements set by HUD and the Palm Beach County Continuum of Care and are evaluated based on the following elements: accuracy completeness, consistency, and timeliness.

The procedure for all programs dictates that every CMIS member agency is required to enter the HUD Universal Data Elements (UDE) in order to meet minimum standards. A copy of the current standards can be found in Appendix 1.

For a Member Agency using the ShelterPoint module, a service transaction is already generated at the time of bed entry. For a Member Agency supplying services or financial assistance only, they must add at least one service under the ServicePoint module. Financial assistance providers must also include the funding source and cost associated with the financial assistance transactions.

For all clients entered into a program, the client record must reflect an Intake completed or service completed entry date upon admission and an exit date upon departure. For those using the ShelterPoint module, an entry and exit is system generated at the time of bed entry and exit. For those who do not use ShelterPoint yet have clients in a program, they must be entered using the Entry/Exit feature under the ServicePoint module.

CMIS Member Agencies who are funded through any of the programs below must meet the basic requirements set by CMIS and also meet additional Program Specific Data Elements (PSDE).

- Emergency Solutions Grant (ESG)
- DCF TANF Grant
- Projects in Assistance of Transition from Homelessness (PATH)
- Supportive Housing Program (SHP)
- Shelter Plus Care (S+C)
- Section 8 Moderate Rehabilitation for Single Room Occupancy (SRO)
- Housing Opportunities for Persons with AIDS (HOPWA)
- DCF Challenge Grant
- Community Development Block Grant (CDBG)
- Emergency Food and Shelter Program (EFSP)
- Financially Assisted Agencies Homeless Program (FAA)
- Safe Haven
- VA per diem beds and contract beds
- Veteran's Administration Supportive Housing voucher Program
- Veteran's Administration Self-Sufficiency for Families Program

All providers receiving HUD funding must have at least one service transaction per client. Every client must have a program entry and program exit and the UDE of income and sources and housing status must be recorded at program entry and program exit and at least one time during a year.

#### **14.4 BEDS INVENTORIES (HOUSING PROVIDERS ONLY)**

All Housing Providers must work with CMIS Staff to build accurate bed lists in CMIS. Each CMIS bed list should be assigned to the appropriate program (Emergency, Transitional, Permanent Supportive, etc.). If there are any changes to the bed lists, the Agency Administrator is required to notify the CMIS Administrator at least 5 business days prior to the beds being removed or added. Clients being assigned to beds or exited from beds in the system should be done in real time as the client is entering / exiting the program. In cases where clients are unable to be entered or exited in real time due to technical difficulties, all data must be current within two (2) business days. Clients entering as households must be built as households in CMIS prior to bed entry and must be assigned together as part of the ShelterPoint module.

## **14.5 SERVICE PRIORITIZATION DECISION ASSISTANCE TOOL (SPDAT)**

Palm Beach County Continuum of Care adopted the SPDAT as the coordinated assessment tool in January 2014. In order for families/individuals to enter into the homeless services system, they must be navigated through the Lewis Center and assessed utilizing the SPDAT.

The SPDAT assesses 15 dimensions (individuals) and 20 dimensions (family) to determine an acuity score that will provide insight into the areas of least and greatest need within each individual or family. The SPDAT identifies the components of an individual or family's life that most likely lead to housing instability. This score will be used to place each client in the most appropriate housing/service intervention based on the needs identified during the assessment. The SPDAT scores will be shared only with appropriate, authorized county agencies to ensure the most accurate results.

Only authorized and trained agency staff can administer and score the SPDAT. Trained staff completes a 1-day training provided by a certified trainer. Upon receipt of the SPDAT certification, access to the tool will be made available.

## **14.6 DATA ACCURACY**

All client data entered into CMIS should match the information captured and filed in the CMIS Member Agency's client record/case file. Observed discrepancies could be subject to audit by HUD, CMIS staff, a local government entity or other community planner.

The CMIS Administration staff will evaluate the quality of all CMIS Member Agency data on the accuracy of the data entered monthly.

Accuracy is the degree to which data correctly reflects the client situation or episode as self-reported by the client.

## **14.7 DATA CONSISTENCY**

Client records entered into CMIS should reflect the client population served, match capacity of enrollment, program type, and entry/exit should fall within service parameters. This information is based on the consistency of accurate data entered on clients receiving services. For example:

- a program for men should not enter data on females or households.
- if a beds program with 20 beds should report more than 20 people in the shelter unless overflow beds are being utilized.
- a fully HUD funded program should only have entry/exit type designated as HUD.

All CMIS Member Agency client data should be consistent with agreement and compatibility of previously entered client data. CMIS staff will complete a review of data over time to look for anomalies, trends, patterns of program and system use.

#### **14.8 DATA COMPLETENESS**

Completeness is the level at which a field has been answered in whole or in its entirety. Measuring completeness can ensure that client profiles are answered in whole and that an entire picture of the client situations emerges.

The Palm Beach County CMIS staff will evaluate the quality of all CMIS Member Agency data on the completeness of the data entered using a CMIS Report Card.

For all clients served and entered into CMIS, a CMIS Member Agency must maintain grade "A" data quality of 95% or above in completeness.

#### **14.9 NULL DATA**

CMIS Member Agencies will be expected to have no more than 5% of all client data "blank/not reported/null" value rate for all clients entered into CMIS (or 95% or above completeness). Blank/not reported/null values include fields that are left blank or answered with a don't know, or unknown value. While these options may accurately reflect what the client has self-reported, they are considered of a low quality value.

#### **14.10 DATA FIELDS**

For all clients served and entered into CMIS by a CMIS Member Agency, all system data quality fields must be completed as there are several data quality fields that are essential to understanding patterns of data entry and client self-reporting. These fields are part of the Universal Data Element (UDE):

- Social Security Data
- Date of Birth Data
- Zip Code of Last Permanent Address Data

If any of these fields are left blank end users must enter a reason. These fields in conjunction with the associated data element field will be used to account for grades on the report card.

#### **14.11 DATA DUPLICATION**

All End Users must search for existing clients in the system before adding a new client into the system. Client data can be searched by Name, Social Security Number, and/or date of birth.

CMIS staff will review duplicate data entries into the system. When duplicate client records created by a CMIS Member Agency are discovered, the CMIS staff will contact the designated Agency Administrator to notify and address the End User creating the duplication.

#### **14.12 REAL-TIME ENTRY**

All CMIS Member Agency client data must be entered in real-time or no later than two (2) business days after intake/entry, assessment, program or service provision, and exit.

Real-time is defined as the actual time during which a process takes place or an event occurs. Real-time data entry allows for efficient client data sharing for all Member Agencies and enhances services for clients

CMIS staff will evaluate the timeliness of the data entered by CMIS Member Agencies. Timeliness is an important measure to evaluate daily bed utilization rates and current client system trends.

#### **14.13 BACK DATE POLICY**

All CMIS Member Agencies should back date any client data not entered in real-time to ensure that the data entered reflects client service provision dates.

##### **ENTRY DATE POLICY**

All CMIS Member Agencies will make every effort to enter data in real-time. In the event that is not possible, the data shall be entered as soon as possible and the entry date shall be the date of service to ensure that data reflects client service provision dates.

#### **14.14 COOPERATIVE ACCURACY**

All The Palm Beach County CMIS staff, CMIS Member Agencies, and the COC will work together to ensure accuracy of reporting.

#### **14.15 BASIC DATA REPORTS**

CMIS software includes a series of reports to aid in reporting successes, finding and correcting data quality errors, and evaluating system trends.

There are 2 types of free reporting tools available to all Member Agencies.

- Canned Reports: For users with Case Management II level access and above, the canned reports are hard coded reports created by the vendor that allow for review of aggregate client level data using pre-determined reporting and format parameters.
- Report Writer: Additionally, there is a Report Writer tool that provides a method to look at some client level details for small sets of data. This is a tool that allows CMIS Member Agencies to customize reports, look at counts, and download sets of client level data.



## **14. 16 ADVANCED DATA REPORTING**

For Advanced Users with Ad Hoc reporting is available to provide for complex detail reporting on client level data as well as providing reports with charts and graphs.

## **15. PERFORMANCE MEASUREMENT**

The HMIS Oversight Committee will establish annual performance goals for the CoC and each program within the CoC in consultation with each Member agency. CMIS staff will provide performance reports on annual goals on a quarterly basis to Member Agencies. These reports will be analyzed by the HMIS oversight committee and published on the CoC website.

## **16. GLOSSARY**

This glossary includes a list of terms that will be used throughout this document and by the CMIS staff:

**Palm Beach County Continuum of Care** –A collaborative funding and planning network that helps communities plan for and provide, as necessary, a full range of emergency, transitional, and permanent housing and other service resources to address the various needs of homeless persons. The PBC COC is also known locally as the Homeless and Housing Alliance (HHA)

**HUD** – US Department of Housing and Urban Development.

**Member Agency** – An partner agency who has signed all CMIS agreements and who is actively entering data into the system.

**CMIS (Also Known as HMIS)** – Refers to the Palm Beach County Client Management Information System, which is known as the Homeless Management Information System by HUD.