POLICIES & PROCEDURES

CLIENT MANAGEMENT INFORMATION SYSTEM (CMIS)

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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 Member Agency License Agreement.

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.

In July 2015, Palm Beach County changed HMIS vendors from Service Point to Client Track. Any enrollments open as of January 1, 2015 were migrated from Service Point into Client Track. The community manually entered basic entry and exit information for housing programs dating back to October 2012 and has access to storage of data prior to October 2012.

3. CMIS SYSTEM WIDE 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 be 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.

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, referred to hereafter as CMIS Staff. 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 staff 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 workflow 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 at both 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:

- 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. In 2018 this report was changed by HUD to the Longitudinal Systems Analysis Report (LSA).
- 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 (Temporary Assistance for Needy Families) Grant, 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) provide 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. Monthly reports will be generated as well as a final report at the completion of the grant period.
- Continuum of Care Performance Data Reports – data is utilized by the COC to access Member Agency's program effectiveness, efficiency and overall performance against a predetermined set of targets.
- System Performance Measures (SPM) – the McKinney Vento Homeless Assistance Act requires communities to measure their performance as a coordinated system, in addition to analyzing performance by specific projects or project types. The intent is to encourage CoCs, in coordination with ESG Program recipients and all other homeless assistance stakeholders in the community, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD on an annual basis.

5. CMIS MEMBER AGENCY

5.1   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 Board of County Commissioners regarding specific CMIS guidelines and use. This contract outlines specific details regarding the CMIS 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 Board of County Commissioners.
- One signed copy of the CMIS Member Agency Agreement will be filed with Palm Beach County Board of County Commissioners. One signed copy will be mailed back to the CMIS Member Agency.

5.2   ROLES 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 in good standing 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 Agency Administrator and End User Annual License Agreements.

All Member Agencies receiving funding from the United States Housing and Urban Development Department (HUD), the United States Department of Veteran Affairs (VA), the United States Department of Health and Human Services (HHS), the United States Department of Homeland Security (DHS), the State of Florida's Department of Children and Families (DCF) office on homelessness and/or 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 of Care 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.

5.3   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 Homeless Program and Contract Manager of Palm Beach County Division of Human Services.

The Homeless Program and Contract Manager will:

- review the grievance
- gather additional information necessary from the agency filing grievance and the agency against whom a grievance is filed
- make recommendations, if any, necessary within 60 days of the receipt of 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 CMIS 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. Each Agency will be responsible to assign a CMIS Member Agency Administrator who can perform the roles and responsibilities outlined below.

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 Administrator. In the event of a change of Agency Administrator, the Executive Director will inform the CMIS Administrator within 24 hours of the change and complete a new agreement. CMIS Agency Administrator Agreement Form will be updated annually.

6.2 ROLES AND RESPONSIBILITIES

The Agency Administrator acts as the operating manager/liaison over the CMIS system at the CMIS Member Agency. They are responsible for ensuring adherence to CMIS Policies and Procedures. This includes but is 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 End User Licenses to CMIS staff no later than 72 hours before a scheduled training date.
- Scheduling/Providing CMIS End User Training.
- Informing CMIS Staff of all program changes (e.g. bed additions or deletions, new program services, bed types) within at least five business days prior to the change in order to update the system for accurate data entry.
- Ensuring client privacy, security, and confidentiality policies are adhered to (Section 9 and 10).
- Ensuring data collection, entry and quality standards are met.
- Responding to CMIS data quality questions within three business days.
- Correcting client data in CMIS within five business days of notification of data errors.
- Attending at least one Agency Administrator Training , yearly or as needed. Attending one Basic User 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 workflow.
- 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 (LSA, PIT, HIC, Pulse, etc.)

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 Data Security Officer.

In the event of a change of Data Security Officer, the Executive Director will inform the CMIS Administrator within at least five 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.
- Verifying as having up-to-date anti-virus protection prior to allowing a device to access the CMIS system.
- 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. All other End Users must have basic computer competency/skills to adequately be able to use and navigate CMIS. Agency Administrator will be responsible for ensuring end users have, at minimum, basic computer competency/skills.

8.3   AFFIDAVIT OF GOOD MORAL CHARACTER

All end users must complete 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, as written in their funding contract, 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 that could affect 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 with the CoC 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   INACTIVATING 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 Staff 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 Staff reserves the right to inactivate or delete the license for any End User for cause, as defined in Section 12.

8.10   TECHNICAL SECURITY

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.

8.11   DETERMINING LEVEL OF CMIS ACCESS

8.11.1 Basic User Level

- View Recycle Bin
- Write reports in Data Explorer
- Print Forms
- Print Reports
- Acuity List Entry – by agency request
- Data Export – by agency request
- SPDAT Access – once trained

8.11.2 Supervisor User Level

- View Recycle Bin
- Edit Recycle Bin (Delete) – by agency request
- Write reports in Data Explorer
- Print Forms
- Print Reports
- Acuity List Entry – by agency request
- SPDAT Access – once trained
- Data Export
- Case Note Editing

8.11.3 Agency Administrator Level

- View Recycle Bin
- Edit Recycle Bin (Delete)
- Write reports in Data Explorer
- Print Forms
- Print Reports
- Acuity List Entry – by agency request
- SPDAT Access – once trained
- Data Export
- Case Note Editing
- Write Case Note Templates
- Merge Organization Clients
- Password Changes

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 sharing client data within 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 written 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 Homeless Program and Contract Manager (Program Manager) of Palm Beach County Division of Human and Veteran 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 and Veteran 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.

Clients who choose to rescind their permission must do so in writing to the CMIS Member Agency by filling out the CMIS Revocation of Client Consent form. 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 form revoking authorization should be kept on file by the CMIS Member Agency. Any future data entry, after revocation, requires the execution of a new Release of Information form.

9.6   REFUSING AUTHORIZATION FOR CMIS DATA COLLECTION

All clients applying for services have the right to refuse consent for CMIS data input. By refusing consent, clients may be denied services based on the type of services they are applying for.

Clients who refuse, or are unable to provide consent, will not be identified in CMIS. The client's record should not have any personal identifiers (First Name, Last Name, Social Security Number, complete Date of Birth) attached to it anywhere in the system. The CMIS Member Agency creating the file must retain a separate record with the CMIS ID and the demographic information excluded from CMIS. To create an anonymous client record:

- Click on Add Anonymous Client (this will create first name "Anonymous" and add a client ID for a last name).
- Enter Refuse (HUD) for Social Security Number Data Quality, and
- Enter 01/01/Year of Birth in Date of Birth field, and d. Enter Approximate or Partial DOB Reported (HUD) in the DOB Data Quality field, and e. Enter Gender, Primary Race and Ethnicity.

****Original Policy

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 Palm Beach County Division of Human and Veteran Services financial assistance program.

Clients who choose to rescind their permission must do so in writing to the CMIS 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, after revocation, requires the execution of a new Release of Information form.

10. CMIS SYSTEM SECURITY

10.1 MINIMUM 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 and most mobile devices.

- Hardware:
- RAM: 4 Gigabyte recommended, (2 Gigabyte minimum)
- Monitor: Screen Display - 1024 by 768 (XGA)
- Processor: Dual-Core processor.
- Internet Connectivity: Broadband Internet Connectivity recommended (High Speed Internet).
- Authorized Browsers:
- Google Chrome 5.0 or greater
- Firefox 3.5 or greater (MINIMUM LEVEL OF SECURITY PROTECTION/MALWARE)
- Safari 4.0 or greater
- Anti-malware applications must be used for protection of the user's computer from malware infections and attacks. All desktops, laptops, servers and other 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 up-to-date anti-virus protection prior to allowing the device to access CMIS.
- 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, 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.

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 the confidentiality of clients, organizations or 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 cause them 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 login within five business days after the initial training date and allow no more than 30 days between login sessions on the live site to keep their license active. Any End User who is non-compliant will have their access revoked by CMIS staff and the user may be required to attend re-training prior to regaining access. A user inactivity report is generated quarterly by CMIS Staff 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 C.F.R. 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 (HHS) 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

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: https://www.hudexchange.info/programs/hmis/hmis-data-and-technical-standards/

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 databases 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 90 days and users are prompted for new dynamic passwords. Additionally, after four 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 256-bit encryption. Exports use 256-bit Advanced Encryption Standard. 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 from their organization.

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, workflow 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   QUARTERLY 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 request items for agenda or discussion. Agency Administrators should submit agenda items no later than 2 weeks prior to the scheduled 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.

11.4   SYSTEM CHANGES REQUESTS

All system change requests must go through the HMIS Subcommittee for approval. The System Change Request Form must be submitted to the CMIS Help email (cmishelp@pbcgov.org) and the request will then be sent out to the subcommittee for a vote. The HMIS Administrator will send out the vote within 2 business days. The vote will be yes, no, or needs discussion. Committee Members will have 2 business days to vote. One vote per agency will be counted. If 2/3 vote "yes", the change request will be approved. If 2/3 vote is not achieved, then the change request will be discussed at the next HMIS Subcommittee meeting. If 2/3 vote is "no", the change request will be denied. The requesting agency and subcommittee members will be notified of the result within 5 business days of initial request. If the request is denied at the subcommittee level, the requesting agency can appeal to the HHA Executive Committee.

All system updates will take effect during pre-scheduled syncs. Syncs occur after the close of business day on the last Tuesday of every month.

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, imminent risk to clients, Unresolved Data Quality Errors):

- CMIS Administrator will suspend all CMIS Member Agency Active End User Licenses. Affected End Users will be suspended until retrained.
- CMIS Administrator immediately reports the violation to the Division Director of Palm Beach County Human and Veteran Services.
- CMIS Administrator / Division Director of Palm Beach County Human and Veteran 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 Administrator 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 and Veteran Services and/or CMIS Administrator 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 Administrator 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 Administrator 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 Administrator may suspend all or some of the CMIS Member Agency End User Licenses in question.

12.3 POTENTIAL COURSES OF ACTION

Probation

The CMIS Administrator 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 Administrator will arrange 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. Frequency of monitoring will be defined in action plan. Notification of probation will be communicated to any relevant funding entities.

<u>Suspension</u>

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.

<u>Termination</u>

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.

<u>Removal of User License</u>

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 Administrator 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:

13.1.1 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.

13.1.2 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 to 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, Clients in Program Report, Outstanding Referral Report, and Service Transaction Report.

13.1.3 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 on the HUD Exchange as part of the HMIS Data Dictionary (https://www.hudexchange.info/resource/3824/himis-data-dictionary).

For a Member Agency using the Housing Workspace, 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 Client Workspace. 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.

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)
- 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)
- VA per diem beds and contract beds
- Veteran's Administration Supportive Housing Voucher Program (VASH)
- Veteran's Administration for Families Program (HCV)
- Veteran's Administration Supportive Services for Veteran Families (SSVF)

All providers receiving HUD funding must have at least one service transaction per client. Every client must have a program entry and program exit (the UDE of income, 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 five 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 in the Housing Workspace.

14.5   BY-NAME LIST

The By-Name list represents the persons or households who are in need of permanent housing. This includes clients who are Category 1 or 4 homeless, and youth who are Category 2 homeless. In CMIS, the By-Name List is accessible by all users on the Home Screen. It is a search form that displays all clients who are enrolled in the CoC By Name List.

Clients are removed from the By-Name list when they are housed or they become inactive. The agency who houses the client is responsible for removing them from the list. The CoC By Name List program will auto-exit after 90 days of no contact. All agency administrators are responsible for ensuring that their agency's enrollments are up to date in a timely manner. All contact services must be updated at least every 90 days to ensure the CoC By Name List enrollment does not auto-close. The CoC By Name List enrollment should be reviewed by each agency inputting on the list at least every 30 days to check for accuracy of entries and exits.

14.6   SERVICE PRIORITIZATION DECISION ASSISTANCE TOOL (SPDAT) VI- 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 with appropriate, authorized county agencies to ensure 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.

14.7 ACUITY LIST DETAIL

For housing programs, the acuity list is utilized to ensure that those with the highest level of vulnerability and longest time homeless are prioritized for enrollment into housing services. The Acuity List is filtered from the CoC By Name List and includes clients who's Acuity Detail Score is entered. Palm Beach County's Acuity list is formulated through the utilization of an index comprised of multiple indicators of vulnerability, as well as associated criteria for program and/or sub-population eligibility. Each indicator is weighted. The values of each indicator are calculated to identify a final score. This score determines ranking on the acuity list. The list is ordered from highest to lowest score. The highest scoring client receives priority for service/housing enrollment. Refer to the PBC Standards for Coordinated Intake and Assessment for more details on this process.

The Acuity Detail options populate based on the client's most recent VI-SPDAT type (individual, TAY-, F-):

- Length of time homeless populates from the homeless start date on the BNL qualifying program and calculates daily.
- Race populates from the basic client information
- Sexual Orientation populates from the basic client information
- Gender populates from the basic client information
- Veteran status populates from the basic client information
- FUSE: Populates as Yes/No based on VI-SPDAT sections if all three are true:
  - o Homelessness: A. History of Housing and Homelessness – Questions 2-3 or 6-7 F-VI (chronic)
  - o Jail Bookings: B. Risks – Question 4f or 8f VI-F (1+)
  - o Behavioral Health: D. Wellness – yes to at least one of the following questions:
    - VI-SPDAT: 21, 22, 23a, 24
    - TAY-VI SPDAT: 22, 23, 25a, 26
    - F-VI SPDAT: 24, 25, 26a, 27

  Additional indicators are added using dropdown menu options on the Acuity Detail screen.
- Chronic Mental/Health/Physical Issue: Yes, Not Engaged in Care; Yes, Engaged in Care; No chronic issue
- Experience in Human Trafficking: Yes/No
- Current Exposure to Violence in Home/Community: Yes/No

Coordinated Entry and Outreach staff assists the identified client with obtaining the required documentation to enter a program. When applicable, staff will be responsible to upload to CMIS documentation of homelessness, chronicity and disability documentation for those on the Acuity List in order to be referred to eligible programs. Documents verifying client's housing eligibility should be visible to partner agencies by selecting "Restrict to MOU/InfoRelease" on the CMIS document upload screen.

14.8 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.

14.9   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 not report more than 20 people in the shelter unless overflow beds are being utilized.

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.

14.10   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 data quality of 95% or above in completeness.

14.11   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.

14.12   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

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.

14.13   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.

14.14   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.

14.15   BACK 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.

14.16   COOPERATIVE ACCURACY

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

14.17   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 two types of free reporting tools available to all Member Agencies.

- Baseline or Canned Reports: 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.
- Data Explorer: provides a method to look at some client level details for small sets of data. This tool allows CMIS Member Agencies to customize reports, look at counts, and download sets of client level data.

14.18   HOUSING PROJECT ENROLLMENT DATES

14.18.1   PROJECT ENTRY DATE

To be enrolled indicates the following factors have been met:

1) Information provided by the client or from the referral indicates they meet the criteria for admission;

2) The client has indicated they want to be housed in this project;

3) The client is able to access services and housing through the project. The expectation is the project has a housing opening (on-site, site-based, or scattered-site subsidy) or expects to have one in a reasonably short amount of time.

14.18.2   HOUSING MOVE-IN DATE

For any permanent housing project (PSH, RRH), the housing move-in date recorded is the date the client or household moves into a permanent housing unit. "This data is critical to point-in-time and housing inventory counts as it differentiates households which have already moved into permanent housing from households which are enrolled in a Permanent Housing project but are still literally homeless (in Emergency Shelter, Safe Haven, Transitional Housing or on the street) as they prepare to move into an available unit." This date should be on or after the project entry date. For example, if the project has an available unit, the entry and housing move-in date may be the same. When there is no unit available at entry, the housing move-in date will be after the project entry date.

The housing move-in date can be entered on the enrollment screen if the move-in date is known when the enrollment is entered. If unknown, the housing move-in date should be added using the update/annual assessment workflow when the client moves in. If a client exits the enrollment to a

permanent destination, but is not housed in your project, the Housing Move-in Date should be added on the exit screen.

"For RRH projects only, a *Housing Move-in Date* must be entered regardless of whether or not the RRH project is providing the rental assistance for the unit. For example, if an RRH project provides supportive services, but is not providing the rental assistance for the unit, a *Housing Move-in Date* must still be entered to differentiate RRH clients in housing from those still experiencing homelessness."

14.18.3   PROJECT EXIT DATE

Project exit represents the end of a client's participation with a project. The project exit date should coincide with the date that the client is no longer considered to be participating in the project.

Each individual client in a household will have their own *Project Exit Date*. If one member of a household leaves the project before the rest of the household, the leaver's exit date should reflect the actual day that client left the project.

For *residential projects (Emergency Shelter, Transitional Housing, PSH),* this date represents the last day of a continuous stay in the project before the client transfers to another residential project or otherwise stops participating in the project.

Clients in *rapid re-housing projects* are to be exited after the last RRH service is provided. If eligible RRH case management services are provided past the final date of receiving rental assistance, for example, the client must not be exited until those services cease.

For *non-residential projects*, the exit date must represent the last day a contact was made or a service was provided. The exit date should coincide with the date the client is no longer considered a participant in the project.

In a *street outreach* services project, similarly, clients may be exited when the outreach worker has been unable to locate the client for an extended length of time and there are no recorded contacts.

If a client uses a service for just one day (i.e., starts and stops before midnight of same day), then the *Project Exit Date* may be the same as the *Project Start Date*.

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:

- **Acuity List –** A list that represents the prioritization of persons who are in need of homeless services or housing interventions, in rank order based on highest level of need to lowest.

- **Assessment –** A process that reveals the past and current details of an individual's/household's strength, and needs, in order to match the client to appropriate services and housing. For the purpose of this document, assessment will refer to a process (whether at primary screening and intake or at entry to a housing program) that reveals a client's eligibility, needs, barriers and strengths.

- **By-Name List –** A list that represents the persons or households who are in need of permanent housing.

- **Central Point of Access –** For the purpose of this document, Central Point of Access is the Homeless Resource Center where individuals or families can go to for intake and assessment of homeless and housing services for which they may qualify.

- **Chronic Homelessness –** A chronically homeless individual is someone who has experienced homelessness for one continuous year or longer, or who has experienced at least four episodes of homelessness in the last three years that add up to 12 months or more and has a disability. A family with an adult member who meets this description would also be considered chronically homeless.

- **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. Homeless Management Information System is a centralized database designated to create an unduplicated accounting of homelessness that includes housing and services.

- **Continuous Stay** – Refers to residential projects where a client checks in and stays each night for an extended period of time and then checks out.

- **Coordinated Assessment –** Relates to the utilization of the same assessment tool across multiple systems to connect clients to services as a means for a coordinated entry system. For the purpose of this document, that tool is the SPDAT (Service Prioritization Decision Assistance Tool) based on population, Individual, Family, or Transition Age Youth.

- **Coordinated Entry (CE)** – The goal of CE is to streamline processes through which communities assess, house, and support housing retention for individuals/families who are homeless; to ensure all of our homeless neighbors are known and supported; to target and maximize limited housing resources; and comply with the federal mandate to adopt a standardized intake and coordinated assessment process for housing.

- **Coordinated Intake Provider Network –** is a consortium of partners that includes homeless service providers, advocacy groups, government agencies, and homeless individuals who are working together to address the housing and support needs of the homeless in Palm Beach County.

- **Diversion** – An approach that supports individuals and families by assisting them in identifying immediate alternative housing arrangements and, if necessary, connecting them with financial and other services to help them return to permanent housing.

- **Document Ready –** This term indicates that an individual's status has been documented through verification of homelessness and/or chronic homelessness through HMIS data, letters from outreach providers or shelters, confirmation documents provided by hospitals or treatment programs, or self-certification up to 30 days and/or verification of disability through SHP form, disability income, or psychiatric and/or medical diagnosis.

- **FUSE –** Palm Beach County FUSE (Frequent User System Engagement): A multiple systems approach to housing unsheltered community members who have high rates of criminal justice contacts, homeless service utilization, and admission to detox and crisis stabilization services. This small subpopulation consists of the top utilizers of services that result in high public costs.

- **Homeless –** HUD definition as of January 2012; is an individual or family who lacks a fixed regular, and adequate nighttime residence, which includes a primary nighttime residence of: a place not designed for or ordinarily used as a regular sleeping accommodation (including car, park, abandoned building, bus/train station, airport or camping grounds); a publicly or privately operated shelter or transitional housing, including a hotel or motel paid for by government or charitable organizations. In addition a person is considered homeless if he or she is being discharged from an institution where he or she has been a resident for 90 days or less and the person resided in shelter (but not transitional housing) or place not meant for human habitation immediately prior to entering the institution.

- **Homeless Resource Center –** The agency identified as the primary administrator of coordinated intake and assessment. For the purpose of this document, that is the Philip D. Lewis Center and the partners administering the coordinated assessment process; Gulfstream Goodwill Industries, Adopt-A-Family and all Homeless Outreach Teams.

- **Housing First –** Evidence-Based programming for housing homeless individuals and families according to the provisions of a standard lease without requiring services other than case management in order to attain and retain housing.

- **Housing Stability (formerly Prevention) –** Assistance that can aid households in preserving their current housing situation by providing assistance to households that otherwise would become homeless.

- **HUD –** The Department of Housing and Urban Development; the United States federal department that administers federal program dealing with homelessness. HUD oversees HEARTH-funded programs.

- **Intake –** the general process between the client's initial point of contact and screening for eligibility. This step involves primary assessment of needs, strengths and resources to refer households into appropriate services

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

- **Navigation –** The process of assessing eligibility in order to connect or refer individuals for services.

- **Navigator –** An intake worker whose responsibility is to provide coordinated intake and assessment for individuals or families seeking housing services.

- **Night by Night** – Refers to emergency shelters where clients check in and stay one night at a time.

- **Outreach –** An outreach worker whose responsibility it is to identify individuals and families who are sleeping in places not meant for human habitation and engage with these individuals with the goal of connecting them to housing resources through coordinated intake and assessment.

- **Palm Beach County Continuum of Care (CoC)** – 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 CoC is also known locally as the Homeless and Housing Alliance (HHA)

- **Prioritization –** The process of using service-specific evaluation criteria to determine which individuals are most urgently in need of homeless services or housing interventions.

- **Rapid Re-housing –** An approach that focuses on moving homeless individuals and families into appropriate housing as quickly as possible by providing the type, amount and duration of housing assistance needed to stabilize the household. Clients do not need to be considered "Housing Ready".

- **Referral –** linking a client to a particular program for possible assistance.

- **Screening –** For the purpose of this document, the process by which eligibility for housing and services is determined at the initial point of contact through coordinated entry. Once screening determines eligibility, the intake and referral process follows.

- **Veteran (HUD) / Veteran Grant Per Diem (GPD)/ Veteran Self Sufficiency Veteran Families (SSVF)** - Any individual that has served one day of active duty.

- **Veteran (VASH) & Healthcare for Homeless Veterans (HCHV)** – any individual that has served 24 months of active duty or is eligible for VAMC Healthcare and has a discharge or release from service under conditions other than dishonorable discharge.