Appendix A: Substantial Amendment for the 2011 Second Allocation of ESG Funds

Substantial Amendment for the Second Allocation of 2011 ESG Funds

Summary of Substantial Amendment

This substantial amendment to the 2011 King County Consortium Action Plan is required by the U.S. Department of Housing and Urban Development (HUD) in order for the King County Consortium to obtain a second allocation of FY 2011 Emergency Solutions Grant Program (ESG) funds from HUD in 2012.

In support of the King County Consortium's Consolidated Plan efforts to reduce homelessness, we propose to target the second allocation of FY 2011 ESG funds for Rapid Re-Housing.

Summary of Consultation Process

King County Housing and Community Development (HCD) administers ESG funds on behalf of King County and a consortium of cities outside the City of Seattle. The consortium's formal decision making body is the interjurisdictional Joint Recommendations Committee (JRC). In March 2012, King County HCD staff met with the JRC to consult on changes to the new ESG rules that became effective in January 2012, and to seek JRC approval for a project recommendation regarding the second allocation of 2011 ESG funds. JRC meetings are open to the public.

At the March JRC meeting, King County HCD staff presented the new ESG program rules, guidelines and program components. HCD staff outlined the project funding available and the substantial amendment requirements to be met in order to receive the second half of the ESG 2011 allocation. HCD staff explained that King County is currently at the maximum level of 2011 ESG funds that can be spent on emergency shelter. As a result of the shelter funding limitation and in order to align with national promising practices, a recommendation was put forth to continue funding King County's Rapid Re-Housing Program for adults without children, which has been a recipient of a grant to King County of American Recovery and Reinvestment Act (ARRA) Homeless Prevention and Rapid Re-housing Program (HPRP) funding from the Washington State Department of Commerce.

HCD staff explained that the ARRA HPRP funding for the Rapid Re-Housing Program for adults without children is set to expire mid-year 2012, leaving the program unfunded in the second half of the year. HCD staff also explained that two other ARRA HPRP funded Rapid Re-Housing Programs for families with children have already been re-funded with other local resources through 2013.

Following the staff presentation, the JRC voted and unanimously approved a recommendation to allocate 2011 ESG funds to continue the Rapid Re-Housing Program for adults without children in King County.

Following the JRC meeting, HCD and City of Seattle staff met with King County's Continuum of Care (the Continuum) representative, the Committee to End Homelessness Interagency Council (IAC), regarding the second allocation of 2011 and 2012 ESG funds for Seattle and the King County Consortium. Staff distributed materials to the IAC summarizing the first allocation of ESG awards in 2011, as well as information on the proposed use of the additional 2011 ESG funds. Seattle and King County staff discussed the benefits of Rapid Re-housing programs with the IAC, including the current efforts to keep the programs for families with children and for adult households without children funded beyond the expiration of the ARRA HPRP awards. The recommendation to continue funding King County's Rapid Re-housing Program for adults without children with King County Consortium ESG funds was agreed to by consensus.

Homeless Participation Requirement

King County's Continuum governance structure includes a Consumer Advisory Council, which is composed entirely of homeless or formerly homeless representatives. The Consumer Advisory Council selects its own

representatives to the CEH Governing Board and Interagency Council (IAC), and provides critical feedback on our Continuum's Ten Year Plan to End Homelessness. The Consumer Advisory Council also has a representative on each of three CEH task forces: 1) youth and young adult homelessness; 2) immigrant and refugee access to resources, and; 3) single adult shelters as a pathway to housing.

Our Continuum is committed to ensuring that Consumer Advisory Council representatives are able to attend and participate in all meetings, and such representatives are provided with stipends and transportation assistance, as needed, to support their attendance. Consumer Advisory Council members were present and engaged in the discussion with the CEH IAC regarding the King County Consortium's recommendation to direct new FY 2011 and 2012 ESG funds to Rapid Re-Housing for adults without children.

Summary of Citizen Participation Process

Per the Consortium's Citizen Participation Plan – Appendix J of the King County's Consolidated Plan, the following steps were taken to provide internal and external stakeholders and the public the opportunity to comment on the Amendment to the 2011 Action Plan:

- On April 2, 2012, the JRC-adopted recommendation for the second allocation of FY 2011 ESG funds, with the amount of 2011 ESG project funding available, was posted for comment on the King County DCHS/HCD website as an amendment to the 2011 Action Plan for the King County Consortium, with alternate formats available upon request; no comments were received from that posting.

- Following specific direction from HUD, revisions were made to the 2011 Action Plan Amendment for the Second Allocation of 2011 ESG Funds.

- On July 4, 2012, an announcement was posted in the Seattle Times directing interested parties to view the revised 2011 Action Plan Amendment for the Second Allocation of 2011 ESG Funds on the DCHS/HCD website from July 4, 2012 through August 3, 2012.

See Attachment A, HCD citizen participation documents.

Match

King County will match dollar for dollar the ESG award with local county dollars.

Proposed Activities and Discussion of Funding Priorities

After consultation with the JRC and the CEH Interagency Council (Continuum of Care), the King County Consortium has proposed award of the second allocation of FY 2011 ESG funds to the Multi-Service Center Rapid Re-Housing Program for adults without children.

Discussion on the proposed use of funds has included the need locally to reduce homelessness through rapid placement out of homelessness, HUD's strong emphasis on rapid re-housing, and our consortium's desire to continue a successful Rapid Re-housing Program for adults without children. With the demonstrated success of this program, the Continuum and the JRC agree that the second allocation of 2011 ESG funds provides a great opportunity to continue the HPRP model.

King County Consortium Annual Action Plan Planned Objective Outcomes – Start date July 2012 / end date June 2013		
Objective / Outcome	**Performance Indicator**	**Expected number Assisted in year one**
Decent Housing Availability / Accessibility	Number of Households rapidly re-housed and stabilized	20 households; up to 40 persons

Detailed Budget

See Attachment B, Tables 1, 2, and 3 for detailed budget information.

Table 1 contains the obligated amounts of 2010 ESG Commitments.

Table 2 contains the obligated amounts of the first allocation of 2011 ESG Commitments.

Table 3 contains the detailed budget for the combined first and second allocation of 2011 ESG.

Written Standards for Provision of ESG Assistance for Rapid Re-housing

See Attachment C, King County Program Guidelines: Rapid Re-Housing for Households without Children.

Process for Making Sub-awards

At the March JRC meeting and the April IAC meeting there was agreement that it is a priority to continue to fund our current HPRP grantee with ESG funds for rapid re-housing for households without children, due to the level of experience of the grantee to continue running the program effectively and meet program performance standards. That grantee is the Multi-Service Center. They were initially selected through a competitive funding process in 2009. HCD will continue to contract with the Multi-Service Center for this activity, and monitor program compliance.

Performance Standards

King County has both an oversight role and a funder role with our Continuum of Care's Homeless Management Information System (HMIS), which is called Safe Harbors. Funding for HMIS is provided by HUD and other state and local funds. Policies and procedures for users, as well as technical assistance and training, are provided by the Safe Harbors staff team, located within the City of Seattle Human Services Department. Safe Harbors has strict policies that protect client data and confidentiality. Safe Harbors is part of the State of Washington's HMIS.

King County uses HUD HMIS data standards and performance indicators to capture and evaluate our Continuum's performance regarding the reduction of homelessness through rapid re-housing. Our continuum's HEARTH performance measures have been reviewed by the appropriate governing bodies, including the Committee to End Homelessness Governing Board and Inter Agency Council.

In addition, data regarding rate of spending, timely draw downs, risk assessment and monitoring results are used to evaluate performance with ESG and other homeless assistance funding.

The county conducts a competitive process when allocating ESG funds and part of the evaluation process is based upon past program performance and participation in the HMIS. All King County contracts, including ESG contracts, are required to participate in Safe Harbors. King County contract language requires contractors to

participate in HMIS/Safe Harbors, and a copy of such requirements is attached to this Appendix in Attachment D.

The county also has performance measures for ESG contracts. For emergency shelters we have two primary performance measures: 1) provide safe and secure bednights for persons who are homeless (programs must be at 90 percent occupancy to meet the county's performance target), and 2) track movement of households served to more stable housing, including transitional housing or permanent housing.

For rapid re-housing, the performance measures are: 1) the number of homeless households rapidly placed in permanent housing; and 2) the number of households that remain permanently housed at 3 months and at 6 months after placement. During the operating year the program's goal will be to place 20 households in permanent housing, composed of up to 40 individuals when accounting for couples. Through housing stabilization services, the program's goal will be to have 90 percent of households still housed at 3 months after placement and 80 percent at 6 months after placement.

In addition, the Continuum has a HEARTH Performance Measure Task Force that is tasked with setting continuum wide targets and benchmarks for measuring services provided and reducing homelessness. These targets and benchmarks include programs funded with ESG. The initial measures of focus are: 1) reducing length of time homeless; 2) decreasing returns to homeless; 3) decreasing first time homelessness.

The county, along with its partners, the City of Seattle and United Way of King County, oversees Safe Harbors. The three entities have a high level governing board, composed of agency directors, an Executive Committee, composed of divisional management leadership, and an Agency Partner Committee, composed of agency program representatives, Safe Harbors staff, and the Executive Committee.

The Safe Harbors Governing Board annually approves the Safe Harbors budget and work plan. The Governing board ensures Safe Harbors is fully funded and functional. The Governing Board also reviews and approves all key policies and procedures for the operation and administration of the Safe Harbors HMIS, including standard operating procedures and agency agreements. Attached is the most current version of the Safe Harbors Standard Operating Procedures (SOPs) that all programs participating in the HMIS are operating under in (see Attachment D to this Appendix). The current SOPs, which are posted on the Safe Harbors website, are currently marked "draft" as they are under revision, and are scheduled to be finalized this quarter.

Attachment A – Citizen Participation Documents

King County Community Development Block Grant (CDBG) Consortium
King County HOME Consortium

King County is seeking public comment on the
King County Consortium 2011 Action Plan as Amended for
the Second Allocation of 2011 Emergency Solutions Grant funds.

The King County Consortium proposes to amend its "2011 Action Plan: One Year Use of Federal Funds" for the second allocation of 2011 Emergency Solutions Grant pursuant to the HEARTH Act. The US Department of Housing and Urban Development (HUD) has issued an interim rule that applies to this amendment for the second allocation of funding under the implementation of the HEARTH Act.

The amendments for the second allocation of 2011 Emergency Solutions Grant (ESG) funds are found on the following pages of the King County Consortium's Action Plan:

Page 16: Adds the ESG funded Rapid Re-housing Project to Homeless Objective 2, Permanent Housing, Strategy 2B, Implementing Rapid Re-housing Projects.

Pages 44 and 45: Addresses ESG requirements and adds all of the additional requirements for the second allocation of 2011 ESG funds as Appendix A.

Public Review and Comment

The 2011 Action Plan As Amended for the Second Allocation of 2011 Emergency Solutions Grant funds is available for public review on July 4, 2012 and will available for comment through August 3, 2012 on the world wide web at http://www.kingcounty.gov/housing in the "What's new" section; on public computers at all King County public libraries; and, in hard copy at the office of the King County Housing & Community Development Program, Chinook Building, 401 5th Avenue, Suite 510, Seattle. Office hours are Monday through Friday 8:30 a.m. to 4:30 p.m.

Comments on the 2011 Action Plan as amended for must be submitted in writing and received no later than 4:00 p.m. on August 3, 2012 at the office of the King County Housing & Community Development Program, Attn: Janice Hougen, Homeless Housing Programs, HCD; 206-263-9089 Chinook Building, 401 5th Avenue, Suite 510, Seattle, WA 98104-1598. Comments may also be e-mailed to Janice.Hougen@kingcounty.gov;

AVAILABLE IN ALTERNATE FORMATS AND LANGUAGES UPON REQUEST
CONTACT KCHCD OFFICE AT 206-263-9092; TTY: 711 (Relay Service)

The Seattle Times

-Notice Details-

These are the details of your notice scheduled to run on the dates indicated below.

Prepayment Information

Method	Card Type	Last 4 Digits	Check Number	Amount Paid

Account Information

Account #:	108378
Advertiser Name:	King County Housing & Commun
Agency Name:	
Contact:	
Address:	401 5th Ave Ste 510 Seattle, WA 98104
Telephone:	(206) 263-9092

Run Date(s)

Seattle Times	07/04/12
NWclassifieds	07/04/12
NWclassifieds	07/05/12
NWclassifieds	07/06/12
NWclassifieds	07/07/12
NWclassifieds	07/08/12
NWclassifieds	07/09/12
NWclassifieds	07/10/12

Notice Placement Information

Notice ID:	210588
Purchase Order #:	
# of lines:	74
Total NET Cost:	$165.02
Class Name:	Public Notices

Legals Desk Contact Information

Phone #	(206) 652-6018
Email:	legals@seattletimes.com

*The ad preview below may not be to actual scale

King County Community Development Block Grant (CDBG) Consortium
King County HOME Consortium

King County is seeking public comment on the King County Consortium 2011 Action Plan as Amended for the Second Allocation of 2011 Emergency Solutions Grant funds.

The King County Consortium proposes to amend its "2011 Action Plan: One Year Use of Federal Funds" for the second allocation of 2011 Emergency Solutions Grant pursuant to the HEARTH Act. The US Department of Housing and Urban Development (HUD) has issued an interim rule that applies to this amendment for the second allocation of funding under the implementation of the HEARTH Act.

The amendments for the second allocation of 2011 Emergency Solutions Grant (ESG) funds are found on the following pages of the King County Consortium's Action Plan:

Page 16: Adds the ESG funded Rapid Re-housing Project to Homeless Objective 2, Permanent Housing, Strategy 2B, Implementing Rapid Re-housing Projects.

Pages 44 and 45: Addresses ESG requirements and adds all of the additional requirements for the second allocation of 2011 ESG funds as Appendix A.

Public Review and Comment

The 2011 Action Plan As Amended for the Second Allocation of 2011 Emergency Solutions Grant funds is available for public review on July 4, 2012 and will available for comment through August 3, 2012 on the world wide web at http://www.kingcounty.gov/housing in the "What's new" section; on public computers at all King County public libraries; and, in hard copy at the office of the King County Housing & Community Development Program, Chinook Building, 401 5th Avenue, Suite 510, Seattle. Office hours are Monday through Friday 8:30 a.m. to 4:30 p.m.

Comments on the 2011 Action Plan as amended for must be submitted in writing and received no later than 4:00 p.m. on August 3, 2012 at the office of the King County Housing & Community Development Program, Attn: Janice Hougen, Homeless Housing Programs, HCD; 206-263-9089 Chinook Building, 401 5th Avenue, Suite 510, Seattle, WA 98104-1598. Comments may also be e-mailed to Janice.Hougen@kingcounty.gov;

AVAILABLE IN ALTERNATE FORMATS AND LANGUAGES UPON REQUEST CONTACT KCHCD OFFICE AT 206-263-9092; TTY: 711 (Relay Service)

Attachment B – Required Tables

Table 1: Declaration of FY 2010 Grant Fund Commitments

Activity Type	Obligated Amount
Homeless Assistance	$188,189
Homelessness Prevention	$
Administrative Activities	9,904
Total FY 2010 Award	**$198,093.00**

Attachment B

Table 2: Declaration of FY 2011 First Allocation ESG Grant Fund Commitments

Activity Type	Obligated Amount
Homeless Assistance	$187,844
Homelessness Prevention	0
Administrative Activities	$9,886
Total FY 2010 Award	**$197,730.00**

Attachment B

FY 2011 Detailed Budget Table 3					
First Allocation	$197,730.00	**FY 2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations**			
Second Allocation	$111,223.00				
Grant Amount	$308,953.00				
Total Administration	$23,171.48				
		First Allocation		**Second Allocation**	**Total Fiscal Year 2011**
	Eligible Activities	**Activity Amount**	**Reprogrammed Amount**	**Activity Amount**	**Activity Amount**
Emergency Shelter Grants Program	Homeless Assistance	**$187,844.00**	**$0.00**		**$187,844.00**
	Rehab/Conversion	$0.00	$0.00		$0.00
	Operations	$165,844.00	$0.00		$165,844.00
	Essential Services	$22,000.00	$0.00		$22,000.00
	Homelessness Prevention	**$0.00**	**$0.00**		**$0.00**
	Administration	**$9,886.00**	**$0.00**		**$9,886.00**
	Emergency Shelter Grants Subtotal	**$197,730.00**	**$0.00**		**$197,730.00**
Emergency Solutions Grants Program	Emergency Shelter**			**$0.00**	**$0.00**
	*Renovation***			$0.00	$0.00
	*Operation***			$0.00	$0.00
	*Essential Service***			$0.00	$0.00
	*URA Assistance***			$0.00	$0.00
	Street Outreach - Essential Services**			**$0.00**	**$0.00**
	HMIS				**$0.00**
	Rapid Re-housing		**$0.00**	**$97,938.00**	**$97,938.00**
	Housing Relocation and Stabilization Services			$35,141.00	$35,141.00
	Tenant-Based Rental Assistance				$0.00
	Project-Based Rental Assistance			$62,797.00	$62,797.00
	Homelessness Prevention		**$0.00**	**$0.00**	**$0.00**
	Housing Relocation and Stabilization Services				$0
	Tenant-Based Rental Assistance				$0
	Project-Based Rental Assistance				$0.00
	Administration			**$13,285.00**	**$13,285.00**
	Emergency Solutions Grants Subtotal		**$0.00**	**$111,223.00**	**$111,223.00**
			Total Grant Amount:		**$308,953.00**

****Allowable only if the amount obligated for homeless assistance activities using funds from the first allocation is less than the expenditure limit for emergency shelter and street outreach activities (see Section III.B. of this Notice).**

Attachement B

Attachment C – Program Guidelines

Rapid Re-housing for Households without Children

KING COUNTY

PROGRAM GUIDELINES

Rapid Re-Housing for Households without Children (RR-SP)

May 2012

Program Philosophy

The purpose of this Rapid Re-Housing Program (HPRP) is to provide assistance to rapidly re-house persons who are experiencing homelessness. HPRP-RR-SP assistance should be "needs-based," meaning that agencies should determine the amount of assistance based on the minimum amount needed to prevent the program participant from returning to homelessness in the near term. Program participants who require longer-term housing assistance and services should be directed to other programs that can provide appropriate assistance.

Eligibility

Clients must be "Literally Homeless" by HUD standards. For the purposes of the Emergency Solutions Grants Program for Rapid Re-Housing, literally homeless is defined as follows:

- An Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
  - An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals; or
  - An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

- Any individual or family who is fleeing, or attempting to flee , domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return

to their primary nighttime residence; has no other residence; and lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Referral of Clients

- Priority will be given to clients being referred from emergency shelters and transitional housing facilities in King County outside the City of Seattle.
- Once there is a waitlist, priority will be given to individuals exiting shelter, or who have been in transitional housing for less than six months.
- After initial intake, shelter or transitional housing staff will conduct a basic screening of clients utilizing a uniform screening tool.
- Referring shelters and transitional housing facilities must maintain a file with all completed screening forms, whether or not clients were deemed eligible for RR-SP. For evaluation purposes, the County will collect these forms regularly.
- Shelters and transitional housing facilities will refer RR-SP eligible clients to the South King County Multiservice Center, Rapid Rehousing Program (MSC).
- Screening forms may be faxed or scanned and e-mailed from the referring program to MSC.
- Once RR-SP slots are full, shelters and transitional facilities may continue to screen clients. When a RR-SP slot becomes available, MSC will call referring programs on rotating basis to identify an eligible client.

Assessment of Clients

- MSC will receive referrals from emergency shelters and transitional housing facilities and will conduct a thorough needs assessment for each household.
- MSC must keep documentation of the screening form received from the referring program as well as assessment forms completed for each household (even if household is ineligible). We expect these forms to be kept together in one place for easy reference. For evaluation purposes, the County will collect these forms regularly.
- MSC will accept referred clients as they are screened into the program on a first-come, first-served basis. No other priority list will be established.
- If a household was marked as "Ineligible for RR-SP", but their situation changes and makes them newly eligible, then that household may be re-referred at a later date.

- The assessment tool used by MSC will include, at a minimum, the following categories as part of the assessment for all RR-SP households:
    1. Housing History
    2. Housing Preferences
    3. Support Network
    4. Income
    5. Employment
    6. Education
    7. General Health Status
    8. Mental Health
    9. Substance Abuse
    10. Veteran Information
    11. Criminal / Legal History
    12. Domestic Violence

Career Connections Potential Assessment Questions:

1. Are you interested in education or training opportunities (e.g. vocational, college, etc.?
2. Have you applied to higher educational opportunities in the past?
3. Have you ever served in the US Military, including the National Guard or Reserves?
4. Are you employed part time? Full time? If not, when were you last employed? Why did you leave your last employment situation?
5. What other social service agencies have you received services from in the past?
6. Are you receiving SSI? SSDI? ?
7. Are you receiving General Assistance Unemployable benefits?
8. Are you receiving TANF services and/or WorkFirst services?
9. Have you ever been convicted of a misdemeanor or a felony?
10. What kind of work would you like to do (eg. Do you enjoy working indoors or outdoors more?)

Housing Relocation and Stabilization Services – Housing Case Management and Search

It is expected that each household will work with their case manager and employment specialist to develop a housing stability and employment/education plan.

The agency will provide housing search and housing case management to clients enrolled in RR-SP. Case management services will be provided according to the

housing stability plan, as needed for individual households. If a client needs information or referrals after exit from the program, the case manager can respond to this request.

These individually tailored services are provided to a client in order to promote permanent housing stability. Eligible services include: case management, outreach and engagement, housing search and placement, legal services, and credit repair.

Examples include conducting client intake/needs assessments, working with staff from emergency shelters and transitional housing programs to ensure appropriate referrals, monitoring and evaluating program participant progress, developing a housing stability plan, conducting housing search, working with the Landlord Liaison Project or individual landlords, conducting unit inspections and lease review, providing housing counseling, conducting outreach for RR-SP, providing budgeting and money management assistance, providing linkage to legal assistance to improve housing stability, and providing linkage to employment services.

Housing case managers will work cooperatively with employment specialists to provide coordinated housing and employment services to clients as appropriate.

Employment Services

Employment services will be provided by the King County Work Training Program. The employment specialists will work from a home base at WorkSource Renton, but will provide mobile services to clients in their own homes. These specialists will assist clients in navigating the complex requirements and responsibilities to help them move toward self-sufficiency. Services will be refined to fit the specific needs of individual clients.

Housing case managers will take the lead on case management services and will work cooperatively with the employment specialists to help homeless households with jobs, job training, and other work-related education. Each household will be assigned a case manager and employment specialist, and they will all work cooperatively to provide appropriate services that are matched with the needs and desires of the households being served.

We aim to develop strategies to improve coordination between these two important service systems as we gain experience with this initiative. Employment services will be available to the household even after RR-SP financial assistance is terminated.

Rental Assistance Model

- The amount of rental assistance provided to a client is based on household income, as well as other factors affecting the household's ability to cover their housing expenses.
- Rental assistance is provided under a stepped model, with the rental subsidy and client rent portion being adjusted as household income increases or decreases.
- The first three month's rent is paid in full giving individuals the ability to utilize their money for items not allowed under this contract. The client may also receive utility assistance depending on need.
- Client eligibility must be re-certified every three months, with income (at or below 30% AMI) as the primary determining factor.
- After three months, the client contributes one-third of their gross income to the rent and pays their own utilities. If the client has no income, their rent may be covered in full for a reasonable period.
- If client experiences a reduction in income, their rent contribution may be recalculated and reduced in line with the loss of income.
- A program participant may not receive more than 24 months of assistance in a three year period.

Other Financial Assistance

- The amount of financial assistance provided to a household is based on the income of that household, as well as other factors to be determined by the specific policies of MSC.
- This assistance includes (See Department of Commerce Program Guidelines document for detail):
    - Security and Utility Deposits
    - Utility Payments
    - Moving Costs
- All payments must be made directly to a third party and not to the client directly. Payments are made for reimbursable expenses only (receipts must be kept on file).

Safe Harbors HMIS – Data Requirements

The agency is required to input all client information directly into the Safe Harbors HMIS. We encourage the agency to submit data "real time", as clients are enrolled in the program, and as services are provided. At the very least, data must be entered within one week of client enrollment and within two weeks of program exit. Reporting timelines for this project are extremely tight, and it is important that all information is completely and accurately reported into Safe Harbors.

Contract Monitoring

The agency can expect regular monitoring visits to ensure program compliance. At a minimum, agencies will be monitored onsite once each year. Please maintain records and receipts of payments made on behalf of clients. County staff may also conduct unit inspections.

Attachment D – HMIS Documents

King County Safe Harbors Contract Language

Safe Harbors Standard Operating Procedures

Attachment D

Safe Harbors – Contract Language for King County Contracts

Program Requirements:

1. Participation in the Safe Harbors Homeless Management Information System requirements (HMIS).

   a. The Contractor shall actively participate in the Safe Harbors HMIS to be eligible for fund reimbursement during the Exhibit period.

   b. Active participation will be evidenced by the program entering a complete data set for all clients served during the Exhibit period. This complete data set will be entered no later than the tenth day of the month following service and as directed in the Safe Harbors Standard Operating Procedures and the Agency Partner Agreement incorporated herein by reference.

   c. The Contractor shall submit a complete data set on all program clients served. This includes universal, program specific and local continuum data elements for required report completion. The universal data elements are name, date of birth, race, ethnicity, gender, social security number, veteran status, disabling condition, residence prior to program entry, and zip code of last permanent address. The additional program specific data elements are income and sources, non-cash benefits, physical disability, developmental disability, mental health, substance abuse, services received, chronically homeless status, exit destination, and reasons for leaving the program. Required local continuum elements include veteran status, refugee/immigrant, cause of homelessness, episodes of homelessness, and residence in incorporated or unincorporated King County. Programs approved for Easy Entry/Exit shall submit the approved sub-set of the data elements.

   d. Obtaining Client Consent: The Contractor will obtain consent before submitting personally identifying information according to procedures outlined in the partner agreement and in compliance with state law. The Informed Consent and Release of Information Form is available on the Safe Harbors website at www. safeharbors.org. For this provision personally identifying information is defined as complete name, complete date of birth and social security number. Contractors are required to submit birth year, gender, and race which are not subject to informed consent. The Contractor must enter all other data elements on each client served regardless of informed consent using a system generated client ID in place of personally identifying information.

e. The Contractor shall share personally identifying information (name, birth date, social security number) at the system designated regional level with client consent. The system designated regional level includes all participating programs within the Seattle/King County Continuum of Care. Only agencies with signed agreements with the Safe Harbors system will have access to the data collected.

f. Clients may not be refused services based solely on their refusal to provide personally identifying information for the HMIS. This is not meant to prevent agencies from collecting information required for eligibility screening or other internal Contractor requirements.

g. Acknowledging the paramount need for confidential domestic violence programs to protect the safety of survivors of domestic violence, personally identifying information should not be entered into Safe Harbors by said programs. Contractors are required to enter all other data elements as stated in Section IV, REPORTING REQUIREMENTS in accordance with the Washington State Department of Commerce Data Collection Directives incorporated herein by reference.

Method of Payment:

1. The County expects the number of households and individuals served and exited as reported in Safe Harbors HMIS for a given quarter to fall between 90 percent and 110 percent of the number of households and individuals served and exited as reported in the King County Community Services Division (CSD) Services Report and/or CSD Client Profile Report for that same time period. The County shall export quarterly reports from Safe Harbors HMIS on or shortly after the tenth day of the month following the end of each quarter. If the Safe Harbors data falls outside of the allowable parameters for the quarter ending three months prior, payment for services rendered shall be withheld until the program is in compliance. The County retains the authority to set the actual reduction level and to negotiate a timeline with the Contractor to achieve compliance with this requirement. The Contractor shall regain the withheld amount once the data in Safe Harbors HMIS is brought within the allowable parameters. The Contractor shall also comply with and refer to the King County Safe Harbors Program Guidelines.

SAFE HARBORS – HOMELESS MANAGEMENT INFORMATION SYSTEM

Standard Operating Procedures

For the SAFE HARBORS-HMIS Implementation

Approved by:

Date:

Release 1.0

Table of Contents

Safe Harbors – Homeless Management Information System 1

Introduction 1

SAFE HARBORS HMIS Objectives 1

Section 1 4

Contractual Requirements and Roles 4

SOP 01-001 Adsystech (Vendor) Responsibilities 6

SOP 01-002 Sponsoring Partner and Executive Committee Responsibilities 9

SOP 01-003 HMIS Safe Harbors Manager Responsibilities 13

SOP 01-004 HMIS Safe Harbors User Group Responsibilities 14

SOP 01-005 HMIS Safe Harbors System Administrator Responsibilities 15

SOP 01-006 HMIS Safe Harbors Research & Evaluation Assistant Responsibilities 16

SOP 01-007 HMIS Safe Harbors Management Systems Analyst Responsibilities 17

SOP 01-008 HMIS Safe Harbors IT Support Tech/Help Desk Responsibilities 18

SOP 01-009 HMIS Safe Harbors Partner Agency Executive Director Responsibilities 19

SOP 01-010 HMIS Safe Harbors Agency Administrator Responsibilities 20

SOP 01-011 HMIS Safe Harbors Agency Report Writer Responsibilities 21

Section 2 20

Implementation Policies & Procedures 20

SOP 02-001 Safe Harbors HMIS Participation Policy 25

SOP 02-002 Initial Participation Requirements 28

SOP 02-003 Agency Information Security Protocol Requirements 30

SOP 02-004 Agency Hardware, Connectivity and Security Requirements 31

SOP 02-005 User Implementation Requirements 33

Section 3 31

Operational Policies & Procedures 31

SOP 03-001 HMIS Safe Harbors Agency Setup Procedure 37

SOP 03-002 HMIS Safe Harbors User Setup Procedure 39

SOP 03-003 HMIS Safe Harbors User Access Levels 41

SOP 03-004 HMIS Safe Harbors Training Requirements 42

DRAFT

SOP 03-005 HMIS Safe Harbors Client Setup/Creation Procedure 43
SOP 03-006 HMIS Safe Harbors Client Notification Policies & Procedures....44
SOP 03-007 HMIS Safe Harbors User Policy....46
SOP 03-008 HMIS Safe Harbors Change Management Policy....49
SOP 03-009 HMIS Safe Harbors Data Collection Requirements 51
SOP 03-010 HMIS Safe Harbors Central Intake Data Sharing....54
SOP 03-011 HMIS Safe Harbors Information Sharing Referral Procedures 55
SOP 03-012 HMIS Safe Harbors User Certification Policy 57

Section 4 54

Security Policies & Procedures 54

SOP 04-001 HMIS System Access Control Policies & Procedures 51
SOP 04-002 HMIS Safe Harbors Data Access Control Policies & Procedures....54
SOP 04-003 HMIS Safe Harbors Auditing Policies & Procedures 55

Section 5 61

Data Ownership, Usage and Release Policies & Procedures....61

SOP 05-001 HMIS Safe Harbors Unduplication Policies & Procedures 62
SOP 05-002 HMIS Safe Harbors Data Quality Standards Policies & Procedures....64
SOP 05-003 HMIS Safe Harbors Data Ownership Policies & Procedures....68
SOP 05-004 HMIS Safe Harbors Data Uses & Disclosures Policies & Procedures 69
SOP 05-005 HMIS Safe Harbors Data Release Policies & Procedures 71

DRAFT

INTRODUCTION

SAFE HARBORS HMIS OBJECTIVES

The SAFE HARBORS HMIS is a countywide data management tool designed to facilitate data collection, and policymaking for the Seattle/King County Continuum of Care in order to improve human service delivery throughout the county. The SAFE HARBORS HMIS is administered by the City of Seattle Human Services Department (HSD) in partnership with King County and the United Way of King County and is the official homeless management information system (HMIS) for the Seattle/King County Continuum of Care. Continuum providers use Safe Harbors to collect client-level data from persons who are homeless in order to understand the extent and nature of homelessness and the effectiveness of the homeless service delivery system in the County.

The primary goal of the SAFE HARBORS HMIS is to provide a data collection tool to aid the Continuum in its efforts to end homelessness in King County. The SAFE HARBORS HMIS provides a critically important vehicle to collect longitudinal client-level data that is grounded in the actual experiences of homeless persons and the service providers who assist them throughout the county. The SAFE HARBORS HMIS facilitates the analysis of information that is gathered from consumers throughout the service provision process to generate an unduplicated count and other aggregate (void of any identifying client level information) information that can be made available to policy makers, service providers, advocates, and consumer representatives.

The SAFE HARBORS HMIS implementation is led by the Seattle Human Services Department in close collaboration with the Seattle/King County Continuum of Care Sponsoring Partner's. The Sponsoring Partner's also rely on a number of committees and task groups to develop policy recommendations and provide guidance on implementation activities. These groups are committed to balancing the interests and needs of all stakeholders involved: homeless men, women, and children; service providers; funders; and policy makers. SAFE HARBORS HMIS objectives for each group are listed below to document the expectations of the system and to inform future SAFE HARBORS HMIS planning and operational decisions.

SAFE HARBORS HMIS Objective to benefit homeless men, women, and children and case managers: Service providers can use the software to track information about their clients in a way, which supports the case management process. Service coordination can be improved when information is shared among case management staff within one agency or with staff in other agencies (with written client consent) who are serving the same clients. Service coordination is available, but not required of participating agencies.

SAFE HARBORS HMIS Objective to benefit agencies and program managers: Aggregate program-level and agency-level information and reports will be accessible to agencies and program managers to provide a more complete understanding of clients' needs and outcomes, advocate for additional resources, complete grant applications, conduct evaluations of program services and staff performance, and report to funders. The software will generate the program portions of the HUD Annual Progress Report (APR) and as well as reports for various State and local funding sources.

SAFE HARBORS HMIS Objective to benefit the Seattle/King County Continuum of Care: Unduplicated, de-identified, system-wide information will be readily accessible to provide a more complete understanding of homelessness, clients' needs and outcomes, and program and system-level performance to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels. The software will also generate data and/or reports to fulfill Federal Annual Homeless Assessment Report, Continuum application requirements, and Continuum-wide and system-level funding reports.

This document provides the policies, procedures, guidelines, and standards that govern SAFE HARBORS HMIS operations and the roles and responsibilities for the Sponsor's, the program, and participating agency staff. They are collectively referred to as the Standard Operating Procedures (SOPs). The SOPs have been drafted in an attempt to achieve the stated objectives while simultaneously protecting individual client information with both

procedural and technical mechanisms. In addition to the provisions included within the specific SOPs, SAFE HARBORS HMIS stakeholders and users will need to comply with applicable state and federal laws regarding client confidentiality.

SECTION 1

CONTRACTUAL REQUIREMENTS AND ROLES

SOP#: 01-001 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **ADSYSTECH (VENDOR) RESPONSIBILITIES**

Policy: Adsystech, Inc. will provide its Adaptive Enterprise Solutions (AES) homeless management information system, and comprehensive professional IT services to fully meet the HMIS Collaboration's Vendor-managed HMIS Project requirements.

Standard: The SAFE HARBORS HMIS related responsibilities of the vendor, Adsystech, will be apportioned according to the information provided below.

Purpose: To define the roles and responsibilities of the vendor, Adsystech with respect to SAFE HARBORS HMIS activities.

Scope: Adsystech, Inc. Managed HMIS Services

Responsibilities:

Adsystech will provide and manage an HMIS system as proposed in Department of Community, Trade, and Economic Development (CTED) Contract Number S08-46108-601. Responsibilities include service, hosting, training and support capabilities for use by Sponsoring Partners and homeless service providers throughout King County.

Adsystech warrants that:

- Software shall be in good operating condition and all software that is defective or not performing in accordance with the Specifications will be repaired, at Adsystech's sole expense.
- Software updates including improvements, extensions, maintenance, error corrections, or other changes that are logical extensions of the original Software will be supplied at no additional charge, including interface modules that are developed by Adsystech for interfacing the Software to other standard software products.
- Technical Support and Consulting Services include but are not limited to: Overall Project Management, Diagnosis and resolution of user software conflicts, on-site system administrator training, creating or configuring new users, applications and views, updating application server configuration, upgrades, moves, changes and adds, creating customized reports and data export.
- Confidential Information will be held in strictest confidence and not released or otherwise made known to any other party without the Sponsoring Partner's express written consent or as provided by law. Physical, electronic, and managerial safeguards will be implemented to prevent unauthorized access to Confidential Information.
- A standard of performance for system availability between 8 am and 5 pm Pacific time will be maintained at 97.5%. Hosting services shall include: hardware to support all environments and capabilities; facilities and environmental controls; security hardware, software, management and practices; and network bandwidth and management from hosting to the Internet.

- Bi-annual independent security audits of the hardware, software and hosting services will be provided as specified in Adsystech's Security Plan.
- Training that is required to prepare teams to effectively complete assessments and requirements development and other necessary tasks will be provided.

SOP#: 01-002 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SPONSORING PARTNER AND EXECUTIVE COMMITTEE RESPONSIBILITIES**

Policy: The Sponsoring Partners will approve all major SAFE HARBORS HMIS policy decisions.

Standard: The SAFE HARBORS HMIS related responsibilities of the Sponsoring Partners will be apportioned according to the information provided below.

Purpose: To define the roles and responsibilities of the Sponsoring Partners with respect to SAFE HARBORS HMIS activities.

Scope: Seattle/King County Continuum of Care Sponsoring Partners: City of Seattle, King County and United Way of King County

MEMORANDUM OF AGREEMENT
between
CITY OF SEATTLE HUMAN SERVICES DEPARTMENT
and
KING COUNTY DEPART OF COMMUNITY AND HUMAN SERVICES
and
UNITED WAY OF KING COUNTY

I. INTRODUCTION

This Agreement is among the King County Department of Community and Human Services ("County"), the City of Seattle, Human Services Department ("City"), and the United Way of King County ("United Way"). The three undersigned parties (hereafter referred as "Sponsoring Partners") agree to operate as a committee for the purpose of coordinating and guiding the ongoing development, operation and maintenance of a King County-wide Homeless Management Information System (HMIS), hereafter referred to as Safe Harbors. The purpose of this agreement is to define the roles and responsibilities of the Sponsors.

Safe Harbors is designed to capture comprehensive and timely information about services supporting persons and families who are homeless or at risk of homelessness in King County and to measure results and outcomes of those services. Goals of Safe Harbors are to: 1) ensure accurate data about the nature of homeless services and clients in Seattle and King County; 2) ensure accurate data about the nature and extent of prevention services provided to households at risk of homelessness in Seattle and King County; 3) assist in facilitating a coordinated system of care for homeless and at risk populations; 4) collect data that fulfills federal, state and local requirements for homeless reporting; and 5) provide client information capacity to facilitate potential collaborative information collection and service development and provision initiatives.

II. DURATION

Except as provided in section VII (Termination), the duration of this Agreement shall be from January 1, 2010 through December 31, 2010. The Agreement shall renew automatically each year thereafter unless

any Sponsor sends written notice of nonrenewal to the other Sponsors no less than thirty days prior to the January 1st renewal date.

III. GOVERNANCE AND OVERSIGHT

A. Safe Harbors Sponsoring Partners

A committee comprised of the Department or Senior Directors of each of the Sponsors or the designees of such Directors will govern the Safe Harbors HMIS. The committee shall meet monthly or as needed. Each sponsor shall have equal voting rights. A chair shall rotate every 4th month.

The Sponsoring Partners shall be responsible for:

- Setting vision and overall policy of Safe Harbors (such as determining scope, new initiatives and associated project charters, etc.)
- Determining Available funding to support Safe Harbors
- Approving annual work plans and budgets
- Approval of annual report

B. Safe Harbors Executive Committee

An Executive Committee Comprising the Division/Planning Directors of each Sponsor or the designees of such Directors will provide oversight of Safe Harbors. Each Executive Committee member will have equal voting rights. They shall meet monthly and elect a chair at the first meeting of the year. The responsibilities of the Executive Committee are:

- Ensuring timely and appropriate implementation of the policies, annual work plans and budget adopted by the Sponsors.
- Providing oversight regarding tactical and operational decisions necessary for the implementation of the adopted policies, work plans and budget referenced above.
- Setting the agenda for the Sponsoring Partners meetings, including identification of policy considerations, risks, implementation challenges, potential changes in scope, work plan and/or budget.
- Facilitation of effective and timely communication with Safe Harbors users, including both provider agencies, staff of the Sponsors, and other stakeholders, and ensuring that their concerns are represented at Executive Committee and Sponsor Committee meetings.

C. City of Seattle

1. The City shall be the fiscal agent for Safe Harbors. The City will be responsible for maintenance and support of Safe Harbors consistent with the HUD Final Notice as published in the Federal Register July 30, 2009 and any subsequent updates to the Final Notice to the extent applicable and consistent with the policies and guidelines established by the Sponsors and the Executive Committee. Such maintenance and support shall include budget management, contracting for budgeted services, fund development, public relations, and reporting to and communicating with Sponsors and other funders, drafting and publishing

program reports, communication with stakeholders and the community and coordination with the vendor.

2. The City, in consultation with the other Sponsors partners, shall hire a Safe Harbors program manager. The City shall supervise the project manager and hire/supervise other staff as necessary for the project. The City will staff the Sponsors Committee and the Executive Committee, including making regular oral and written reports on the budget and work-plan progress, organizing the meetings, creating agendas, taking minutes and maintaining project archives.

IV. DATA OWNERSHIP AND ACCESS

The Sponsors shall be equal and joint owners of the Safe Harbors data that is maintained in the Safe Harbors database. The Sponsors have access to all de-identified data that has met quality assurance standards as stipulated by Safe Harbors HMIS staff. Identified data for research and or evaluation purposes shall be released to community partners upon review and approval by the Executive Committee. All data sharing and requests must comply with federal and state requirements related to the release of confidential information.

Proprietary Right

The parties to this Agreement hereby mutually agree that if any patentable or copyrightable material should result from work described herein, all rights accruing from such material or article shall be the sole property of the Sponsors. The parties agree to and do hereby grant to the City of Seattle, King County, and all federal and state agencies irrevocable, nonexclusive and royalty-free license to use, according to law, any material or article and use any method that may be developed as a part of the work under this Agreement. The foregoing license shall not apply to existing training materials, consulting aids, check lists and other materials and documents of the parties which are modified for use in this Agreement unless they were developed with other federal/state employment and training funding.

V. AMENDMENT/NOTICES

This Agreement may be amended in writing by all Sponsors. Notices shall be mailed or delivered to the Executive Committee members or to their successors at such addresses as may be from time to time provided by the County Sponsoring Partners.

VI. TERMINATION

A. Any Party may terminate this Agreement at a date prior to the renewal date specified in this Agreement, by giving 60 days written notice to the other parties. In the event of termination of this Agreement, the parties shall be liable for payment for their portion of services that were authorized for payment and rendered prior to the effective date of termination.

B. If the funds relied upon to undertake activities described in this Agreement are withdrawn or reduced, or if additional conditions are placed on such funding, any Party may terminate this Agreement within 30 days by providing written notice to the other parties. The termination shall be effective on the date specified in the notice of termination.

VII. CHOICE OF LAW

This Agreement shall be construed and enforced in accordance with and governed by the laws of the State of Washington.

VIII. HOLD HARMLESS AND INDEMNIFICATION

Each Party shall defend, indemnify and hold harmless the other Party and all of its officials, employees, principals and agents from and to the extent of all claims, demands, suits, actions, and liability of any kind whatsoever which arise out of, are connected with, or are incident to errors, omissions or negligent acts of the Party, its contractor, and/or employees, agents, and representatives in performing its obligations under this Agreement. The Parties agree that their obligations under this paragraph extend to claims made against one Party by the other Party's own employees or invitees. For this purpose, the Parties, by mutual negotiation, hereby waive, as respects the other Party only, any immunity that would otherwise be available against such claims under the industrial insurance provisions of RCW Title 51.

IX. ENTIRE AGREEMENT

This Agreement sets forth entire relationship of the parties to the subject matter hereof, and any other agreement, representation, or understanding, verbal or otherwise, dealing in any manner of is Agreement is hereby deemed to be null and void and of no force and effect whatsoever.

If any provisions of this Agreement shall be deemed in conflict with any statute or rule of law, such provision shall be deemed modified to be in conformance with said statute or rule of law.

SOP#: 01-003 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS MANAGER RESPONSIBILITIES**

Policy: The Safe Harbors Manager will be put in place to manage all aspects of the day-to-day operations of the HMIS according to the Policies & Procedures outlined in the document.

Standard: The responsibilities of the SAFE HARBORS HMIS Manager will be apportioned according to the information provided below.

Purpose: To define the roles of the HMIS Manager

Scope: Operation of the HMIS

Responsibilities:

The SAFE HARBORS HMIS manager is responsible for oversight of all day-to-day operations including:

- Quality assurance of the Adsystech application hosting and operation;
- Managing agency and user system access based on execution of applicable agreements, training, and adherence to approved policies;
- Providing technical support and application training to users, in compliance with levels documented in SOPs 01-007, Management Systems Analyst Responsibilities and 01-008, IT Support Tech Responsibilities;
- Developing a reasonable number of reports for SAFE HARBORS HMIS users based on requests from the Sponsoring Partner's or its designated committee;
- Maintaining overall SAFE HARBORS HMIS quality assurance program; and
- Orientation and supervision of SAFE HARBORS HMIS technical staff to ensure appropriate program operations, compliance with guiding principles and Standard Operating Procedures.

The SAFE HARBORS HMIS Management will respect the core principles of the system by:

- Ensuring that access to areas containing equipment, data, and software will be secured.
- All client-identifying information will be strictly safeguarded in accordance with all applicable Federal and State laws using the latest technology available.
- All data will be securely protected to the maximum extent possible.
- Ongoing Security assessments to include penetration testing will be conducted on a regular basis.

To facilitate the operation of the SAFE HARBORS HMIS implementation, the SAFE HARBORS HMIS Manager will assign a qualified staff person who has attended Adsystech Product training to act as the SAFE HARBORS HMIS system administrator to manage the interface between central SAFE HARBORS HMIS operations and Partner Agencies for system administration purposes.

SOP#: 01-004 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS USER GROUP RESPONSIBILITIES**

Policy: The Partner Agencies should have a forum for providing input on planning and HMIS governance issues.

Standard: Designated individuals will serve on the SAFE HARBORS HMIS User Group to formally manage communication on system issues between user agencies, HSD, the Continuum, and SAFE HARBORS HMIS management.

Purpose: To outline the major responsibilities of the SAFE HARBORS HMIS User Group.

Scope: System-wide

Responsibilities:

The Safe Harbors Users Group (SHUG) is a King County-based organization representing the collective interests of member users of the Safe Harbors HMIS along with associated parties whose activities are dependent upon the successful future development and maintenance of Safe Harbors HMIS. The County Sponsoring Partners will each appoint three members to the SHUG, two from the provider community and one from the appointing authority, each for a period of two years. The Committee to End Homelessness will also appoint one member for two years. The Program Manager for Safe Harbors will serve ex officio and will not have a vote.

The SHUG will advise the Program Manager and the Executive Committee regarding Policies & Procedures, system bugs, and future enhancements to improve system functionality and user productivity. The SHUG will also provide guidance for program management and for ways in which data gathered in the Safe Harbors HMIS can be used and shared with the agencies serving homeless persons and organizations representing homeless persons, and for how relevant information can be provided to elected officials and the public.

The SHUG charter can be found in the Safe Harbors Users' Group Operating Procedures at www.safeharbors.org .

The SAFE HARBORS HMIS User Group is responsible for:

- Identifying and prioritizing system enhancements.
- Providing quick feedback loop on system performance.
- Identifying the best uses of the SAFE HARBORS HMIS to inform training and other technical assistance needs.
- User Group Chair/Co-chairs may be involved in the process of imposing sanctions on users/agencies for misuse of system. (This procedure is further specified in SOP 04-003: Auditing Policies & Procedures)

The SAFE HARBORS HMIS User Group may be subdivided by type of partner categories (e.g. direct partner agencies, data integration agencies and anonymous data submittal partner agencies).

SOP#: 01-005 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS SYSTEM ADMINISTRATOR RESPONSIBILITIES**

Policy: The SAFE HARBORS HMIS System Administrator will be responsible for managing the day-to-day technical aspects of the SAFE HARBORS HMIS.

Standard: A designated staff, housed at HSD, will hold the position of the SAFE HARBORS HMIS System Administrator.

Purpose: To outline the major responsibilities of the SAFE HARBORS HMIS System Administrator.

Scope: SAFE HARBORS HMIS System Administration

Responsibilities:

The SAFE HARBORS HMIS System Administrator is responsible for:

- Understanding all aspects of the Adsystech EASHMIS module (commonly referred to as the SAFE HARBORS HMIS);
- Providing ad-hoc application training and technical support to Agency Technical Administrators about the SAFE HARBORS HMIS application, functionality, and agency-level system administration functionality;
- Communicating system availability, planned outages, and other SAFE HARBORS HMIS information to Agency Technical Administrators for Direct and Interface agencies;
- Managing user accounts and application access control, in conjunction with the Agency Technical Administrators;
- Assisting with Agency data integration at regularly scheduled intervals;
- Administering the SAFE HARBORS HMIS database, in conjunction with Adsystech staff;
- Managing HMIS data interfaces;
- Making application level changes to setups and configurations;
- Modifying and creating high-level formulas and code definitions/business rules; and
- Communicating significant application issues and/or system enhancement requests to the SAFE HARBORS HMIS Manager.

SOP#: 01-006 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS RESEARCH AND EVALUATION ASSISTANT RESPONSIBILITIES**

Policy: The SAFE HARBORS HMIS Management team will provide a reasonable level of support to the SAFE HARBORS HMIS implementation for developing SAFE HARBORS HMIS report functionality.

Standard: Designated staff, housed at HSD, will hold the position of the SAFE HARBORS HMIS Research and Evaluation Assistant.

Purpose: To outline the major responsibilities of the SAFE HARBORS HMIS Research and Evaluation Assistant.

Scope: SAFE HARBORS HMIS Research and Evaluation Assistant

Responsibilities:

The SAFE HARBORS HMIS Research and Evaluation Assistant is responsible for working with the SAFE HARBORS HMIS Manager to develop, manage, update and execute needed reports for HSD, the Seattle Continuum of Care and participating HMIS agencies using the predefined SAFE HARBORS HMIS reporting tools.

Specifically that responsibility entails:

- Designing, analytical and agency level reports according to predefined SAFE HARBORS HMIS standard formats and schedules;
- Generating funding-related reports and data analysis for Sponsors and the Continuum, in conjunction with the System Administrator according to predefined formats and schedules;
- Deactivating/retiring reports, as needed;
- Communicating data quality trends; and
- Communicating significant application issues and/or system enhancement requests to the SAFE HARBORS HMIS System Administrator and/or SAFE HARBORS HMIS Manager.

SOP#: 01-007 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS MANAGEMENT SYSTEMS ANALYST RESPONSIBILITIES**

Policy: The SAFE HARBORS HMIS Management team will provide a reasonable level of support to the SAFE HARBORS HMIS implementation by providing direct agency support through the Management Systems Analyst (MSA) positions.

Standard: Each MSA will be assigned to agencies who have been identified as SAFE HARBORS HMIS participating agencies. The MSA will be responsible for coordinate all efforts related to each assigned agency.

Purpose: To ensure that agencies are supported effectively to use the SAFE HARBORS HMIS in the most comprehensive manner possible.

Scope: The SAFE HARBORS HMIS Management Systems Analyst

Responsibilities:

The Management Systems Analyst will assess and analyze program participation needs in conjunction with funder requirements. This position will provide support and follow-up to agency staff using the HMIS system to ensure complete data is being collected in accordance with funder requirements.

- Supports up to 25 agencies with the HMIS and provides facilitation of all aspects of program participation in the HMIS; program set-up, completion of all forms and agency agreements, user identification and coordination of training, assessment of funder requirements, assessment of data quality and problem solving data accuracy issues.
- Conduct site visits to individual programs as part of the comprehensive agency support package.
- Assist agencies in understanding and completing entry of information into the HMIS system
- Provide feedback to agencies on how to correct, edit, and refine incomplete client data
- Assess agency level business processes and provide guidance on possible improvements
- Trouble-shoot data entry challenges with agency and Safe Harbors team
- Study and analyze a variety of informational, operational and management problems to determine program and system needs; recommend solutions to meet those needs.
- Apply management and systems analysis techniques to the issues of work methods, procedures and priorities.
- Prepare comprehensive reports, and correspondence findings and recommendations.
- Analyze training needs of users, develop training plans and materials; train users in operating equipment, system software and system output and controls.
- Perform other duties of a comparable level/type as required

SOP#: 01-008 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS IT SUPPORT TECH/HELP DESK RESPONSIBILITIES**

Policy: The SAFE HARBORS HMIS Management team will provide a reasonable level of support to the SAFE HARBORS HMIS implementation by providing direct agency support through the It Technical Support help desk position.

Standard: The help desk will be responsible for providing tools and knowledge that empowers customers of the Safe Harbors HMIS system to be effective partners in delivering homeless services in King County.

Purpose: To outline the role of the Safe Harbors Help Desk position.

Scope: The SAFE HARBORS HMIS IT Technical Support Help Desk

Responsibilities:

The Safe Harbors Help Desk Support Team is committed to delivering effective customer service by:

- Ensuring timely and courteous dispatch, follow-up and effective resolution of customer issues through a single point of contact.
- Accurately defining nature and priority of calls upon intake in the HEAT system
- Responding to customer requests for support within published time frames with a goal of 90% of calls being resolved within 24 hours. Ensure customer communications when tickets are not resolved within SLA time guidelines
- Using the HEAT system and its reports to monitor and evaluate quality of service on a weekly basis
- Creating the framework for a knowledge base of customer frequently asked question (FAQ's) to be updated quarterly.
- Providing links to HMIS resources, standards, and reference materials.
- Documenting and analyzing customer issues/concerns to identify training and support needs that are relevant to the needs of our customers through the HEAT ticket system and evaluation feedback.
- Creating a transparent feedback loop and implementing success measurements for continuous service improvement through review by the Executive Committee.

Services:

- Assist customers with Safe Harbors HMIS access issues
- Assist customers with issues specific to Safe Harbors HMIS Software
- Assist customers with issues specific to Safe Harbors HMIS Policies & Procedures

SOP#: 01-009 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **PARTNER AGENCY EXECUTIVE DIRECTOR RESPONSIBILITIES**

Policy: The Executive Director of every Partner Agency will be responsible for oversight of all agency staff members who generate or have access to client-level data stored in the system software to ensure adherence to the SAFE HARBORS HMIS standard operating procedures outlined in this document.

Standard: The Executive Director holds final responsibility for the adherence of his/her agency's personnel to the SAFE HARBORS HMIS Guiding Principles and Standard Operating Procedures outlined in this document.

Purpose: To outline the role of the agency executive director with respect to oversight of agency personnel in the protection of client data within the SAFE HARBORS HMIS application.

Scope: Executive Director in each Partner Agency

Responsibilities:

The Partner Agency's Executive Director is responsible for all activity associated with agency staff access and use of the SAFE HARBORS HMIS. This person is responsible for establishing and monitoring agency procedures that meet the criteria for access to the SAFE HARBORS HMIS, as detailed in the Standard Operating Procedures (SOPs) outlined in this document. The Executive Director will be ultimately responsible for any misuse of the software system by his/her designated staff. The Executive Director agrees to only allow access to the SAFE HARBORS HMIS based upon need. Need exists only for those program staff, volunteers, or designated personnel who work directly with (or supervise staff who work directly with) clients, have data entry or other data-related agency administrative responsibilities.

The executive director also oversees the implementation of data security policies and standards and will:

- Assume responsibility for completeness, accuracy, and protection of client-level data entered into the SAFE HARBORS HMIS system;
- Establish business controls and practices to ensure organizational adherence to the SAFE HARBORS HMIS SOPs;
- Assign an Agency Technical Administrator to manage agency-related technical tasks;
- Communicate control and protection requirements to agency custodians and users;
- Authorize data access to agency staff and assign responsibility for custody of the data; and
- Monitor compliance and periodically review control decisions.

SOP#: 01-010 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS AGENCY ADMINISTRATOR RESPONSIBILITIES**

Policy: Every Partner Agency must designate one person to be the Agency Administrator.

Standard: The designated Agency Administrator holds responsibility for the administration of the system software in his/her agency.

Purpose: To outline the role of the Agency Administrator

Scope: Partner Agencies

Responsibilities:

The Executive Director of each Partner Agency will appoint a qualified person as the Agency Administrator, who will need to successfully complete the Administration training provided by SAFE HARBORS HMIS Management.

This person will be responsible for:

- Reviewing and updating agency information in SAFE HARBORS HMIS database, including agency-defined fields, user access initially, and in an ongoing capacity;
- Managing technical access to the software system for persons authorized by the agency's Executive Director by working with the SAFE HARBORS HMIS System Administrator to create usernames and passwords;
- Notifying SAFE HARBORS HMIS System Administrator of personnel changes within 24 hours of their occurrence;
- Training new staff persons on the uses of the SAFE HARBORS HMIS including review of the SOPs in this document and any agency policies which impact the security and integrity of client information;
- Ensuring that access to the SAFE HARBORS HMIS be granted to authorized staff members only after they have received training and satisfactorily demonstrated proficiency in use of the software and understanding of the SOPs and agency policies referred to above.
- Notifying all users in their agency of interruptions to service.

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

- Administering agency-specified business and data protection controls;
- Administering and monitoring of access control;
- Detecting and responding to violations of the SOPs or agency procedures; and
- Providing assistance in the backup and recovery of data (for agencies that are not directly inputting client data into the SAFE HARBORS HMIS database.

SOP#: 01-011 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS AGENCY REPORT WRITER RESPONSIBILITIES**

Policy: Every Partner Agency may designate a person(s) to be the Agency Report Writer.

Standard: After completion of SAFE HARBORS HMIS required training, an Agency Report Writer may utilize SAFE HARBORS HMIS Management and Ad Hoc report tools to generate custom reports for his/her agency.

Purpose: To outline the role of the Agency Report Writer

Scope: Partner Agencies

Responsibilities:

The Executive Director of each Partner Agency may designate one or more qualified persons as an Agency Ad Hoc Report Writer, who will need to successfully complete the Data Quality, Funder and Ad Hoc Report training provided by SAFE HARBORS HMIS Management. This individual may be the same individual designated as the Agency Technical Administrator.

Based on the training requirements, this person will have the opportunity to work with the SAFE HARBORS HMIS Research and Evaluations Assistant to develop, manage, update and execute custom agency reports to analyze and report agency data in the SAFE HARBORS HMIS database.

The specific report development tasks mirror those outlined for the SAFE HARBORS HMIS Research and Evaluations Assistant.

SECTION 2

IMPLEMENTATION POLICIES & PROCEDURES

SOP#: 02-001 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS PARTICIPATION POLICY**

Policy: Agencies that are funded by the City or Continuum to provide homeless programs in the City of Seattle will be required to participate in the SAFE HARBORS HMIS. All other homeless providers are strongly encouraged to participate in the SAFE HARBORS HMIS.

Standard: SAFE HARBORS HMIS Management will provide quality SAFE HARBORS HMIS services to all participating agencies.

Purpose: To outline which agencies are expected to participate in the SAFE HARBORS HMIS, the extent to which their participation is mandated or voluntary, and a definition of participation.

Scope: All homeless housing and service providers.

Procedure:

HUD requires all grantees and sub-recipients of McKinney-Vento CoC program funds to participate in the local HMIS. McKinney-Vento grants include Emergency Shelter Grants and Supportive Housing Program, Section 8 Moderate Rehabilitation SRO, Shelter Plus Care grants. This policy is consistent with the Congressional direction for communities to provide data to HUD on the extent and nature of homelessness and the effectiveness of its service delivery system in preventing and ending homelessness.

The HMIS and its operating Policies & Procedures are structured to comply with the HUD Data and Technical Standards Final Notice. Agencies are further required to participate in the local HMIS if the Agency is a recipient of any State, King County, City of Seattle or United Way of King County homeless housing or supportive services funding as determined by executed contracts with said funders. Agencies are also regulated by HIPAA and other Federal, State and local laws, the Continuum may negotiate its procedures and/or execute appropriate business agreements with partner agencies so they are in compliance with applicable laws.

MANDATED PARTICIPATION

All providers that are funded by the Continuum to provide homeless services must meet the minimum participation standards of the SAFE HARBORS HMIS, as defined by this SOP. Participating agencies will be required to comply with all applicable SOPs, and must agree to, execute, and comply with the SAFE HARBORS HMIS Agency Partner Agreement. Fund sources mandating HMIS participation are: McKinney, HPRP, THOR, ESHP, IYHP, ESG, HOPWA, HHSF, HSVL, MIDD, RAHP, City of Seattle and United Way of King County Out of the Rain.

VOLUNTARY PARTICIPATION

Although funded agencies are only required to meet minimum participation standards, the Continuum will strongly encourage funded agencies to fully participate with all of their homeless programs. While neither the Continuum nor HSD can require non-funded providers to participate in the HMIS, they will also work closely with non-funded agencies to articulate the benefits of the HMIS and to strongly encourage their participation in order to achieve a comprehensive and accurate understanding of homelessness in Seattle.

MINIMUM PARTICIPATION STANDARDS

Minimally participation includes:

- Collecting the universal data elements, as defined in SOP 03-009: Data Collection Requirements, for all programs operated by the agency that primarily serve persons who are homeless or formerly homeless;
- Collecting program-specific data elements, as defined in SOP 03-009: Data Collection Requirements, for all clients served by the program funded by the Continuum and/or HSD; and
- Submitting data to the Continuum using one of the following options:
    - Option 1: Entering client-level data into the SAFE HARBORS HMIS within seven days of client interaction, as defined by the Agency Partner Agreement.
    - Option 2: Uploading digital data to the SAFE HARBORS HMIS from an existing agency database on a monthly basis using the SAFE HARBORS HMIS interface provided by Adsystech. With this option, the agency will be responsible for programming the interface, including all associated costs. This option must have prior approval from the Safe Harbors Sponsoring Partner's (Data Integration Partner Agency)
    - Option 3: Due to legal constraints, extreme vulnerability, and heightened safety needs of victims of domestic violence and client diagnosed with HIV/AIDS, DV and HIV/AIDS providers need an alternative method of participation in the HMIS. DV and HIV/AIDS providers will enter data in anonymously for all clients served.

All submitted data will be used by HSD and the Continuum for analytical and administrative purposes, including the preparation of HSD reports to funders, and the Continuum's participation in the Federal AHAR program. A client has the right to refuse to have his/her data entered into the SAFE HARBORS HMIS database. The client's individual choice regarding participation will not affect his/her right to services.

DISCUSSION OF PARTICIPATION OPTIONS

Each agency will have an opportunity to determine which participation option is most appropriate given agency functional and administrative needs, technological capacity, funding requirements, client characteristics and circumstances, and legal constraints. Agencies that receive funding from the Continuum or HSD must meet specific funding requirements related to data submittal. Each agency must propose which option for participation is most appropriate and that option must be approved by the Sponsoring Partners.

The participation options are described below. If additional information is desired, SAFE HARBORS HMIS and/or Continuum management can elaborate on each option to help each partner agency decide on the most appropriate way of participating in the Continuum's HMIS initiative.

Direct Data Entry Option: Authorized agency users directly enter client-level data into the SAFE HARBORS HMIS database. Users have rights to access data for clients served by their agency and use SAFE HARBORS HMIS functionality based on their user level privileges. The agency's data will be stored in the SAFE HARBORS HMIS central database server, protected by numerous technologies to prevent access from unauthorized users. Unless a client requests that his/her identifiers remain hidden at the time that his/her record is created, primary client identifiers (e.g. name, SSN, DOB and gender) will be able to be queried by other SAFE HARBORS HMIS users to prevent duplicate records from being created in the database. However, other individual client data will not be accessible by other SAFE HARBORS HMIS users outside of the client notification and interagency data sharing procedures. These procedures are described in SOP 03-006: Client Notification Policies & Procedures and SOP 03-011: Interagency Data Sharing.

Data Integration Option: If the agency maintains its own electronic case management information system that conforms to the most current HUD data standards, the agency can request to upload electronic client-level data to the SAFE HARBORS HMIS on a monthly basis using an SAFE HARBORS HMIS interface operated by Adsystech. With this option, the agency will be responsible for programming the interface, including all associated costs. In this case, once uploaded the agency's data will be stored in the SAFE HARBORS HMIS central database server, protected by numerous technologies to prevent access from unauthorized users. No client data about Interface agencies' clients will be accessible by other SAFE HARBORS HMIS users. This option must be approved in writing by the Sponsoring Partners.

Participation Option for DV and HIV/AIDS Programs and Clients Submittal of Data: As stated above, this participation option will be extended to providers of programs operating DV or HIV/AIDS programs. The resulting revisions to or additional SOPs will be forwarded to the Sponsoring Partner's for consideration and approval.

SOP#: 02-002 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFEHARBORS INITIAL PARTICIPATION REQUIREMENTS**

Policy: Each Partner Agency must meet all initial participation requirements in order to receive access to the SAFE HARBORS HMIS.

Standard: SAFE HARBORS HMIS Management Team will certify that the Partner Agency has met the participation requirements prior to initiating the SAFE HARBORS HMIS.

Purpose: To provide Agencies with clear expectations for their participation in the SAFE HARBORS HMIS.

Scope: System-wide

Requirements:

A completed Agency HMIS Partner Agreement and User Code of Ethics for each staff to be trained must be present in the SAFE HARBORS HMIS Agency file prior to SAFE HARBORS HMIS access.

Partner Agreement: An authorized Agency representative is required to execute an Agency Partner Agreement stating his/her commitment to uphold the Policies & Procedures for effective use of the system and proper collaboration with the SAFE HARBORS HMIS Management. An executed Agency Partner Agreement must be present in the SAFE HARBORS HMIS Agency file prior to SAFE HARBORS HMIS access.

Information Security Protocol: Documentation of the agency's Information Security Protocol (developed in accordance with SOP 02-003: SAFE HARBORS HMIS Agency Information Security Protocol Requirements) and dissemination plan must be on site at agency prior to SAFE HARBORS HMIS access.

Documentation: All documentation on agency and program information must be submitted to ensure that complete and accurate Partner Agency information is input within the SAFE HARBORS HMIS. All forms must be present in the SAFE HARBORS HMIS Agency file prior to SAFE HARBORS HMIS access.

Agency Administrator: One key staff person or contractor must be designated to serve as the Agency Administrator for the agency. (See Section One for a description of responsibilities.) The Agency Administrator must be formally identified and attend Agency Administrator Training prior to SAFE HARBORS HMIS access.

Site Hardware & Connectivity Requirement: Any computer being used to access the SAFE HARBORS HMIS must meet the minimum hardware and recommended connectivity requirements indicated in SOP 02-004: SAFE HARBORS HMIS Agency Hardware and Connectivity Requirements. Partner Agencies that are funded by the Continuum to provide homeless services will be allowed to submit budget revisions to reallocate available grant funds to support costs of equipment and connectivity required for participation in the SAFE HARBORS HMIS, if necessary.

Fees: Fees are not being charged to Agencies utilizing SAFE HARBORS HMIS, but may be charged in the future.

- Each Partner Agency will be assigned user licenses that will be fully subsidized by the City as part of the SAFE HARBORS HMIS initiative.
- The Continuum and City will subsidize overhead training and technical support costs associated with SAFE HARBORS HMIS policy and software training, such as staff, location, curriculum development, and web-enabled technical support materials.
- Ultimately, each Partner Agency is liable for individual agency costs associated equipment purchase, equipment maintenance, internet connectivity, and SAFE HARBORS HMIS-related personnel expenses. The City and Continuum will attempt to provide need-based financial assistance to subsidize purchase of hardware and connectivity costs.
- Data Integrated: All data that will be integrated from a Partner Agency's existing database to the SAFE HARBORS HMIS database must be cleaned, updated, and formatted according to SAFE HARBORS HMIS data specifications prior to integration. The specific integration process must be individually discussed with the SAFE HARBORS HMIS Management team.

SOP#: 02-003 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS AGENCY INFORMATION SECURITY PROTOCOL REQUIREMENTS**

Policy: Partner Agencies must develop and have in place minimum information security protocols to protect client information stored in the SAFE HARBORS HMIS database.

Standard: SAFEHARBORS HMIS Management staff will certify that the Partner Agency has adequate documentation of its information security protocol, a dissemination plan, and verification that the information security protocols have been implemented within the agency prior to granting SAFE HARBORS HMIS access.

Purpose: To protect the confidentiality of client data and to ensure its integrity at the agency site.

Scope: Direct Partner Agencies

Requirements:

At a minimum, the Partner Agency must develop rules, protocols or procedures that are consistent with Section 3: Operational Policies & Procedures and Section 4: Security Policies & Procedures to address the following:

- Internal agency procedures for complying with the SAFE HARBORS HMIS Notice of Uses and Disclosures and provisions of other SAFE HARBORS HMIS client and agency agreements (See SOP 03-006: SAFE HARBORS HMIS Client Notification and Consent Procedures);
- Maintaining an updated copy of the agency's Notice of Uses and Disclosures or equivalent privacy notice on the agency's website, in accordance with SOP 03-006.
- Appropriate assignment of user accounts;
- Preventing user account sharing;
- Protection of unattended workstations;
- Protection of physical access to workstations where employees are accessing SAFE HARBORS HMIS;
- Identification of appropriate locations and methods for safe, protected storage, transmission and access to hardcopy and digital SAFE HARBORS HMIS generated client records and reports with identifiable client information;
- Immediate notification to SAFE HARBORS HMIS System Administrator of addition, changes to or disposal of equipment used to access the SAFE HARBORS HMIS;
- Proper cleansing of equipment prior to transfer or disposal; and
- Procedures for regularly auditing compliance with the Agency Information Security Protocol.

SOP#: 02-004 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS AGENCY HARDWARE, CONNECTIVITY AND SECURITY REQUIREMENTS**

Policy: Any computer that interfaces with the SAFE HARBORS HMIS must meet the minimum desktop specifications and recommended connectivity specifications identified by this SOP.

Standard: The Partner Agency must certify that they have adequate hardware and connectivity to interface with the SAFE HARBORS HMIS prior to granting SAFE HARBORS HMIS access.

Purpose: To provide agencies with minimum requirements for hardware and connectivity.

Scope: System-wide

Requirements:

WORKSTATION SPECIFICATIONS:

Computers interfacing with SAFE HARBORS HMIS must meet the minimum desktop specifications below.

- Operating System: Windows XP Pro Service Pack 2 (Recommended) or newer version.
- Processor and Memory: Minimum specifications required to run the selected operating system
- Video: Color monitor (17" Recommended) with graphics card that supports 1024 x 768-display resolution, 256 Colors or better.
- Web Browser: MS Internet Explorer 8/ MS Internet Explorer 6.0 / or MS Internet Explorer 6.01, Service Pack 1.

INTERNET SPECIFICATIONS:

Agencies directly entering data must have internet connectivity for each workstation that will be accessing the SAFE HARBORS HMIS. To optimize performance, all agencies are encouraged to secure a high-speed internet connection with a cable modem or DSL/ISDN. Agencies with very low expected volume may be able to connect using a dial-up connection; however, the SAFE HARBORS HMIS management cannot guarantee satisfactory performance with this option.

Agencies considering or using a wireless internet configuration must employ higher security measures, such as WEP encryption. Wireless settings must be documented as part of the information security protocol, and should be verified with the SAFE HARBORS HMIS management prior to HMIS-SAFE HARBORS HMIS access.

SECURITY SPECIFICATIONS:

All workstations directly accessing the SAFE HARBORS HMIS and <u>any workstation that is on a network</u> that has a workstation(s) directly accessing the SAFE HARBORS HMIS must have:

- Operating System Updates. Operating system updates must be downloaded and applied automatically or on a regular basis.
- Adequate firewall protection and apply all critical virus and system updates automatically.
- Virus protection software. Virus definitions must be updated automatically.
- Anti-spyware software. Spyware definitions must be updated automatically.

SOP#: 02-005 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS USER IMPLEMENTATION REQUIREMENTS**

Policy: All SAFE HARBORS HMIS Management and Partner Agency users who require legitimate access to the software system will be granted such access upon completion of required training and execution of an SAFE HARBORS HMIS User Code of Ethics.

Standard: Individuals with specific authorization to access the system software application for the purpose of conducting data management tasks associated with their area of responsibility.

Purpose: To outline the role and responsibilities of SAFE HARBORS HMIS users.

Scope: System-wide

Responsibilities:

ELIGIBLE USERS

The SAFE HARBORS HMIS Management shall only authorize use of the SAFE HARBORS HMIS to users who need access to the system for technical administration of the system, report writing, data analysis and report generation, back-up administration or other essential activity associated with carrying out central server responsibilities.

The Partner Agency shall only authorize use of the SAFE HARBORS HMIS to users who need access to the system for data entry, editing of client records, viewing of client records, report writing, administration or other essential activity associated with carrying out participating agency responsibilities.

User types are defined in SOP 03-003: SAFE HARBORS HMIS User Access Levels.

USER REQUIREMENTS

Prior to being granted a username and password, users must:

- Execute a SAFE HARBORS HMIS User Code of Ethics form; and
- Successfully complete all SAFE HARBORS HMIS training required. (Training requirements are documented in SOP 03-004: SAFE HARBORS HMIS Training Requirements.)

SAFE HARBORS HMIS users cannot attend training until all Agency and *User* paperwork is complete and approved by the Executive Director (or designee). Users must be aware of the sensitivity of client-level data and take appropriate measures to prevent unauthorized disclosure of it. Users are responsible for protecting institutional information to which they have access and for reporting security violations. Users must comply with the all policy and standards described in these Standard Operating Procedures. They are accountable for their actions and for any actions undertaken with their usernames and passwords.

ENFORCEMENT MECHANISMS

All potential violations of any security protocols will be investigated by SAFE HARBORS HMIS management. Any user found to be in violation of security protocols will be sanctioned according to the procedure delineated in SOP 04-003: Auditing Policies & Procedures. Sanctions include, but are not limited to:

- A formal letter of reprimand;
- Suspension of system privileges;
- Revocation of system privileges;
- Termination of employment; and
- Criminal prosecution.
- A Partner Agency's access may also be suspended or revoked if serious or repeated violation(s) of the SOPs occur by Agency users.

SECTION 3

OPERATIONAL POLICIES & PROCEDURES

SOP#: 03-001	Prepared by: SAFE HARBORS HMIS
Approval Date:	
Title: **SAFE HARBORS HMIS AGENCY SET-UP PROCEDURE**	

Policy: The SAFE HARBORS HMIS Management System Analyst or designee may set up a new agency account, based on the following procedure.

Standard: The SAFE HARBORS HMIS Management Systems Analyst must verify documentation of all initial implementation requirements listed in Section 2 prior to authorizing a new agency.

Purpose: To inform potential agencies and the SAFE HARBORS HMIS Management Systems Analyst of the Agency set-up requirements.

Scope: Direct Partner Agencies and Data Integration Agencies

Responsibilities:

Only Authorized Agencies will be granted licenses to access the HMIS system. Safe Harbors shall make the sole determination to identify Authorized Agencies in the Seattle/King County Continuum of Care. SAFE HARBORS has final authority over the Seattle/King County HMIS.

In order to ensure the integrity and security of sensitive data, SAFE HARBORS will regulate access to this data. Only Agencies that have agreed to the terms set out in the HMIS Agency Partner Agreement will be allowed access to the HMIS. The Agency Partner Agreements will include terms and duration of access, an acknowledgement of receipt of the Policies and Standard Operating Procedures Manual, and an agreement to abide by all provisions contained therein.

Prior to setting up a new Agency Partner Agency within the SAFE HARBORS HMIS, the Executive Director of the proposed agency must complete the required implementation requirements outlined in Section 2: Implementation Policies & Procedures.

The SAFE HARBORS HMIS Management Systems Analyst shall:

- Review SAFE HARBORS HMIS records to ensure that the Agency does not have previous violations with the SAFE HARBORS HMIS SOPs that prohibit access to the SAFE HARBORS HMIS.
- Verify that the required documentation has been correctly executed and submitted, including:
    - Executed Partner Agreement;
    - Agency, User, and Program Information Forms;
    - Designation of Agency Administrator;
- Request and receive approval from the SAFE HARBORS HMIS Management Team to set up a new agency.
- Authorize a new Agency within the SAFE HARBORS HMIS.
- Work with the Agency Administrator to input applicable agency and program information.
- Work with SAFE HARBORS HMIS Management Team to migrate legacy data, if applicable.

The process for setting up Data Integration Agencies is comparable, except that the SAFE HARBORS HMIS Management Team must also work with agencies to develop an approved interface to upload data from the agency database to the SAFE HARBORS HMIS database.

SOP#: 03-002	Prepared by: SAFE HARBORS HMIS
Approval Date:	
Title: **SAFE HARBORS HMIS USER SET-UP PROCEDURE**	

Policy: The SAFE HARBORS HMIS Management Systems Analyst may create a new User ID for eligible individuals based on the following procedure.

Standard: The SAFE HARBORS HMIS Management Systems Analyst must document that the following set-up procedure has occurred prior to setting up a new user.

Purpose: To inform all parties involved with the SAFE HARBORS HMIS of the requirements to become an SAFE HARBORS HMIS user.

Scope: Direct Partner Agencies and Interface Partner Agencies

Responsibilities:

If the Partner Agency wants to authorize system use for a new user, the Agency Executive Director (or authorized designee) must:

- Determine the access level of the proposed SAFE HARBORS HMIS user (See SOP 03-003 SAFE HARBORS HMIS User Access Levels); and
- Authorize the creation of a user account for the specified individual by completing a new User Request Form that designates the access level.

The proposed SAFE HARBORS HMIS user must:

- Attend applicable training modules (once enrolled by the Agency Administrator).
- Execute an SAFE HARBORS HMIS User Code of Ethics form.

The Agency Administrator must:

- Input the user information into an 'SAFE HARBORS HMIS New User Request' for SAFE HARBORS HMIS Management Systems Analyst approval.
- Enroll the potential SAFE HARBORS HMIS user in the required training modules.
- Submit the executed SAFE HARBORS HMIS User Code of Ethics via fax or mail to the SAFE HARBORS HMIS Management Systems Analyst.

The SAFE HARBORS HMIS Management Systems Analyst shall:

- Review SAFE HARBORS HMIS records about previous users to ensure that the individual does not have previous violations with the SAFE HARBORS HMIS SOPs that prohibit access to the SAFE HARBORS HMIS.
- Verify that the required documentation (SAFE HARBORS HMIS New User Request electronic form and SAFE HARBORS HMIS User Agreement have been correctly executed and submitted.
- Verify that required training modules have been successfully completed.

- Approve the new user request electronically by assigning a user ID.

Once the user ID is established, the Agency Administrator is responsible for maintaining the user account. The Agency Administrator should work with the new user upon creation of the account to establish a permanent password using the self-serve functionality within the SAFE HARBORS HMIS. The Agency Administrator is also responsible for immediately terminating user access if any user leaves employment with the agency, or otherwise no longer needs access to the SAFE HARBORS HMIS.

The Executive Director is responsible for ensuring that the user understands and complies with all applicable SAFE HARBORS HMIS SOPs.

SOP#: **03-003** Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS USER ACCESS LEVELS**

Policy: Each SAFE HARBORS HMIS user must be assigned a designated user access level that controls the level and type of access the individual has within the system.

Standard: The SAFE HARBORS HMIS Management Systems Analyst will not create a user ID until documentation of successful completion of required training is provided.

Purpose: To designate SAFE HARBORS HMIS user access levels.

Scope: Partner Agencies and Data Integration Partner Agencies

Responsibilities:

All SAFE HARBORS HMIS users must be assigned a designated user access level that controls the level and type of access that user has within the system. Unless otherwise specified below, each user will only have access to client-level data that is collected by their own agency or an agency network partner, unless a client specifically consents to temporary information sharing for referral purposes.

The level of access for each SAFE HARBORS HMIS user type is defined in the table below.

SYSTEM-LEVEL USERS

The SAFE HARBORS HMIS System Team will be granted access to system-wide SAFE HARBORS HMIS data in order to accomplish their system administration, reporting responsibilities and assessment of client-level data as part of their system administration responsibilities. For instance, the System Administrator(s) and/or Adsystech may need occasional access to data in order to manage and test application development and administration functions.

HMIS Partners can be assured that City of Seattle employees must undergo a criminal background check and must execute computer security and data confidentiality agreements prior to employment. Adsystech employees are bound by the SAFE HARBORS HMIS contract to maintain strict confidentiality of all SAFE HARBORS HMIS data, and undergo similar employment screening protocols. As well, all system-level users will also undergo SAFE HARBORS HMIS policy training and execute an SAFE HARBORS HMIS User Code of Ethics form.

Several persons will be assigned access to de-identified system-wide data for reporting and analytical purposes, including: staff members of the City of Seattle HSD, King County CSD, or United Way of King County who are responsible for generating homeless program funding reports; staff of the HSD Homeless Services Division who are responsible for evaluating program effectiveness related to City-funded contracts and providing analysis on the state of homelessness in Seattle; and staff of the Seattle Continuum of Care who are responsible for data analysis and reporting related to the implementation of the 10-Year Plan to End Homelessness.

Based upon a written request to the SAFE HARBORS HMIS System Administrator, a listing of persons with access to system-level SAFE HARBORS HMIS data will be provided to any Partner Agency within 5 business days of receipt of the request.

SOP#: **03-004** Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS USER TRAINING REQUIREMENTS**

Policy: SAFE HARBORS HMIS users must successfully complete the training modules required for their user type.

Standard: The SAFE HARBORS HMIS Management Systems Analyst will not create a user ID until documentation of successful completion of required training is provided.

Purpose: To inform users of the training requirements to access the SAFE HARBORS HMIS.

Scope: Direct Partner Agencies and Interface Partner Agencies

Responsibilities:

Prior to gaining access to the SAFE HARBORS HMIS application, users must successfully complete the following training modules.

User Type	Training Module(s)	Training Provider
Agency Case Management Users (e.g. Agency Intake Worker, Case Manager, Program Manager)	Intro to SAFE HARBORS HMIS Snapshot training Recording services training Data quality reports training	SAFE HARBORS HMIS Management
Agency Administrator (Partner Agency)	Intro to SAFE HARBORS HMIS Snapshot training Data quality and funder reports training	SAFE HARBORS HMIS Management
Agency Report Writer	Intro to SAFE HARBORS HMIS Data quality and funder report training Ad-Hoc Report Training	SAFE HARBORS HMIS Management
Agency Technical Administrator (Data Integration Partner Agency)	Introduction to Data Integration Management Report Training Ad-Hoc Report Training	SAFE HARBORS HMIS Management

SOP#: 03-005 Prepared by: SAFE HARBORS HMIS

Approval Date: 6/28/04

Title: **SAFE HARBORS HMIS CLIENT SET-UP/CREATION PROCEDURE**

Policy: Each user must follow the client set-up procedure when creating a new client record.

Standard: The Executive Director of each Partner Agency must ensure that the agency has adequate procedures in place to ensure that client records are set up according to this procedure.

Purpose: To inform agencies and users about the appropriate client setup procedures.

Scope: System-wide

Responsibilities:

FOR DIRECT ENTRY PARTNER AGENCIES:

- Explain SAFE HARBORS HMIS to client and obtain written consent, according to SOP 03-006: SAFE HARBORS HMIS Client Notification Procedure.
- Search for existing Client Record in Central Intake. Select existing client record and/or create a new client record.
- Collect client information, according to SOP 03-009: SAFE HARBORS HMIS Data Collection Requirements.

FOR DATA INTEGRATION PARTNER AGENCIES:

- Ensure that agency database generates unduplicated client analysis.
- Obtain written consent to share information with SAFE HARBORS HMIS.
- Explain Agency's intent to share client information with the SAFE HARBORS HMIS, according to SOP 03-006: SAFE HARBORS HMIS Client Notification Procedure.
- Collect client information, according to SOP 03-009: SAFE HARBORS HMIS Data Collection Requirements.
- Upload client information on a monthly, if not more frequent, basis.

For DV or HIV/AIDS HMIS Data Entry Partner Agency

- Collect client non-identified information, according to SOP 03-009: SAFE HARBORS HMIS Data Collection Requirements.

SOP#: 03-006 Prepared by: SAFE HARBORS HMIS

Approval Date: 6/28/04

Title: **SAFE HARBORS HMIS CLIENT NOTIFICATION POLICIES & PROCEDURES**

Policy: Partner Agencies shall use the required client notification and/or consent procedure prior to entering any client-level data into the SAFE HARBORS HMIS.

Standard: The Executive Director of each Partner Agency is responsible for ensuring that the agency has implemented appropriate procedures to enforce the client notification and consent procedures.

Purpose: To give client's control of their personal information.

Scope: System-wide

Responsibilities:

All verbal and written client notification and consent must include a statement that no client will be denied service for refusal to consent. The Continuum has prepared a standard document for Client Consent and Release of Information. Partner Agencies must use these forms or in their entirety into the Agency's own documentation. All written consent forms must be stored in a client's case management file for record keeping and auditing purposes.

Agencies must make reasonable accommodations for persons with disabilities throughout the data collection process. This may include but is not limited to, providing qualified sign language interpreters, readers or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability.

Agencies that are recipients of federal assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program.

DEFINITIONS AND DESCRIPTIONS OF CLIENT INFORMED CONSENT PROCEDURES

Informed Consent and Release of Information: The agency must adopt the SAFE HARBORS HMIS Client Notification Forms. If the agency has a website, the adopted Client Notification Forms must also be posted on the website.

As part of the notification process, clients must be informed of their right to designate his/her client record as de-identified right to refuse to have his/her information entered into the SAFE HARBORS HMIS system. This client also has a right to view a copy of his/her record upon request.

At any point during the case management process, an agency staff member can initiate a referral to another agency. The SAFE HARBORS HMIS provides functionality to automate the referral and to provide users of the recipient agency with access to a specified portion of the originating agency's client record as part of the referral. (The specific details of Referral Process are described in SOP 03-011: SAFE HARBORS HMIS Information Sharing Referral Procedures.) In order to provide access to client data with a referral, the originating agency must receive a written client release of information that specifically indicates the recipient agency, purpose for sharing, the specific data categories that are being shared, the expiration of the consent, and whether or not the originating agency has permission to receive information back from the referral agency on the outcome of the referral. Any client data can potentially be sent through the referral process based on client release.

To fulfill this requirement, the agency may adopt the SAFE HARBORS HMIS Client Release of Information for Referrals or may develop an internal form that incorporates the content of the standard SAFE HARBORS HMIS form.

Special Notice for Persons Who May be Victims of Domestic Violence: The purpose of this Notice is to make clients who have experienced domestic violence aware that their identified data is never entered into the SAFE HARBORS HMIS. Any data entered for persons whom this applies does not include, name, date of birth or SSN or any combination of data that can be used in combination to identify and individual.

Prior to entering any client information into the SAFE HARBORS HMIS database, the mainstream service provider must present **each client** with the Special Notice for Persons who May be Victims of Domestic Violence and provide an oral explanation of the Notice. The staff at mainstream agencies must be trained on the protocol for educating domestic violence victims.

Special Notice for Persons Who May be Diagnosed with HIV or AIDS: The purpose of this Notice is to make clients who have been diagnosed with HIV/AIDS aware that their identified data is never entered into the SAFE HARBORS HMIS. Any data entered for persons whom this applies does not include, name, date of birth or SSN or any combination of data that can be used in combination to identify and individual.

Prior to entering any client information into the SAFE HARBORS HMIS database, the mainstream service provider must present **each client** with the Special Notice for Persons who May be Diagnosed with HIV or AIDS and provide an oral explanation of the Notice. The staff at mainstream agencies must be trained on the protocol for educating individuals living with HIV or AIDS.

APPLICABILITY

In all cases, the Partner Agency shall uphold Federal and State Confidentiality regulations to protect client records and privacy. If an agency is covered by HIPAA, the HIPAA regulations prevail.

The table below summarizes the client data categories and the related notification/consent and sharing rules that relate to each data category. These minimum procedures should not imply that all providers will perform all of these functions.

SOP#: 03-007	Prepared by: SAFE HARBORS HMIS
Approval Date:	
Title: **SAFE HARBORS HMIS USER POLICY**	

Policy: Policies, procedures, guidelines, and standards that govern the users of the Seattle/King County Homeless Management Information System (HMIS).

Standard: Roles and responsibilities of all agencies and persons with access to HMIS data, and important and useful information about the ways in which HMIS data is secured and protected.

Purpose: To outline the major policies which guide the roles and responsibilities of all SAFE HARBORS HMIS users.

Scope: System-wide

ROLE OF AGENCIES

Agency Partners are non-profit agencies contracted to provide homeless housing, prevention and other related services to people in King County who are homeless or at risk of becoming homeless. Their staff and business processes are directly impacted by changes in HMIS functionality and processes.

SECURITY AND USER ACCESS

Safe Harbors staff will make arrangements for the installations of software at the agency computers, and issuing license keys for each computer used by all Agency staff. If a license is installed on a computer at an agency and there is no activity within 45 days the license will be made invalid.

A signed Agency Partner Code of Ethics form will be filed in the Safe Harbors Office and a copy mailed to the authorized agency for their files for each user.

Agency users will be trained to use Adsystech through regular training sessions scheduled by Safe Harbors. Once introductory training has been completed, each user will be issued a user name and password by the Agency Support Staff assigned to that Agency. Each user will also be given a copy of the HMIS Standard Operating Procedures and HMIS Users Guide.

- Each user is provided with a unique user name and password.
- Sharing of user names and passwords is prohibited in the HMIS.
- Sharing of user name/passwords is considered a serious breach of the user agreement and could result in sanctions and/or appropriate personnel action.
- Agencies must protect identified data that is downloaded or retrieved from the HMIS onto local computers and/or networks.
- Once identified data has been retrieved from the HMIS and saved to a PC, network or disk, the data must be kept secure through encryption and/or password protection.
- Storing identified data on floppy disks, CDs, flash drives or unprotected laptops is not recommended unless proper security precautions have been taken. Unencrypted or unprotected data from the HMIS may not be sent via email.

CLIENT RIGHTS, CONSENT, AND ETHICAL USE OF DATA:

The HMIS operates under a model of Written Informed Consent, which means that permission to enter a consumer's information into the HMIS is permitted only with informed, signed consent. Services will not be denied if a client chooses not to participate. Personal information collected about the persons served within programs should be protected. Each agency and user must abide by the terms of the agency privacy policy, the HMIS SOPs.

- Client demographic data (with client consent), will be shared with the Seattle/King County Continuum of Care
- Sharing of program level client data between agencies will require a signed Interagency Sharing Agreement.
- Programs within agencies may share data as decided upon by the agency's executive director and/or Local Agency Administrator.
- Users may not change default program level client record security settings to "region" without a signed Interagency Sharing Agreement in place.
- Users that are found to be inappropriately opening client records to other agencies will have their access to the HMIS immediately terminated.

DATA REMOVAL, REVIEW AND GRIEVANCES:

- A client may request to see their HMIS data or may request that personally identifying information be removed from the HMIS.
- In response to a legitimate request from a consumer to remove his/her personally identifying information from the HMIS, the agency should remove such data from the client record within 72 hours.
- A record of these transactions must be kept by the Agency Administrator. In response to requests to view his/her data in the HMIS, the agency administrator or case manager must provide a copy of the requested data within a reasonable time frame to the client.
- Requests for changes to client information are considered on a case by case basis.

In order to facilitate the support process, Agencies (Partners) in the Safe Harbors community are expected to:

- Establish a primary agency contact who is authorized to submit requests that are non-data entry related (i.e., User setups and permissions, license key requests, training requests, program changes).
- Use the Safe Harbors Help Desk (206) 386-0030 or SafeHarborsHMISHelp@seattle.gov as single point of contact for all requests for service.
- Provide the Safe Harbors Help Desk Team with your complete contact information and a description of the issue, and any impacts we need to be aware of to resolve your issue.
- Maintain a working knowledge of Safe Harbors HMIS software and reference tools (i.e. attend trainings, refer to the Safe Harbors HMIS training manual; and Safe Harbors website: http://www.safeharbors.org/) with the goal of having all regular users attaining Level 1 or Level 2 certification within 6 months of Agency hire.
- Abide by the User Code of Ethics as outlined in the User Responsibility Code of Ethics signed prior to receiving user ID.

SCHEDULE OF REPORTS

- Data entry is due by the 5th of every month for the previous month's data.
- Data integration files are due to City of Seattle by the 5th of every month and should include an entire months worth of data. Invoices submitted (whether by month or by quarter) will indicate by calendar month and by sub grantee a) the total number of households served each month and b) the total number of households

exited each month. City of Seattle staff will run ad hoc reports indicating numbers of households served and numbers of households exited as contained in the HMIS for each month of the quarter. If the numbers submitted by grantee and the numbers in the HMIS do not align, email correspondence will commence to rectify the differences between the two numbers.

In order to ensure that invoices are correct, the following are recommended:

- Set deadlines for data entry internally – "all data for the week must be entered on that week", etc.
- Use HMIS to report your counts of households served and households exited from your HMIS
- Make sure you are caught up on your backlog of data by the 5th day following the end of each month
- Communicate frequently with your program managers if there is a delay in data entry so that numbers of households served and exited can be aligned internally before they are submitted to funders on each month's invoice.

The Sponsoring Partners are aware that the data in the HMIS may not align with the numbers of households served and exited that are submitted with *each monthly invoice* as a result of data integration practices. Remember, however, that when invoices following the end of the quarter are submitted, the Sponsoring Partners will look at each of the invoices that the grantees have submitted for that quarter and if any of the monthly totals submitted during that quarter do not align with the monthly totals entered in the HMIS, the last invoice of the quarter will not be paid until all the month's invoices align with HMIS.

PRIVACY COMPLIANCE AND GRIEVANCE POLICY

Agencies must establish a regular process of training users on this policy, regularly auditing that the policy is being followed by agency staff (including employees, volunteers, affiliates, contractors and associates), and receiving and reviewing complaints about potential violations of the policy. Agencies may want to appoint a Chief Privacy Officer to be responsible for these tasks.

SOP#: 03-008	Prepared by: SAFE HARBORS HMIS
Approval Date:	
Title: **SAFE HARBORS HMIS CHANGE MANAGEMENT**	

Policy: Policies, procedures, guidelines, and standards that govern the users of the Seattle/King County Homeless Management Information System (HMIS).

Standard: Roles and responsibilities of all agencies and persons with access to HMIS data, and important and useful information about the ways in which changes to HMIS data are managed.

Purpose: To outline the major policies which guide change management in regards to HMIS.

Scope: System-wide

Responsibilities:

If Agency users encounter programming issues within the HMIS application that need to be addressed, the user should report the error or suggested improvement to the Agency Administrator. The Agency Administrator should contact the Safe Harbors Help Desk and submit a Service Request identifying the specific nature of the issue or recommended improvement along with immediacy of the request.

Service requests will be routed appropriately and reviewed by Safe Harbors staff for further action. Suggested application improvements will be compiled and periodically discussed between the Washington State Department of Commerce and Safe Harbors staff. Requests to fix programming errors or "bugs" will be prioritized and forwarded to the Adsystech, as appropriate.

Change management entails the planning, scheduling, tracking, and reporting of the installation, maintenance, and upgrade of hardware, software and networks. If any Agency desires modifications to the existing software including but not limited to: custom reports required exclusively by that Agency, swipe cards, scan forms, additional system modules, or for any other purpose that is not deemed mutually beneficial per the "Statewide HMIS Governance", permission must be obtained from the Sponsoring Partners. Changes cannot require creation of a different code-base for the shared HMIS application.

Because changes to desktops, servers, network environments or departmental business applications may impact the overall HMIS system performance, the HMIS project and the Agency must obtain permission from the Sponsoring Partners prior to implementation.

Program Related Change Requests

- Once Adsystech has developed an emergency fix to an issue deemed as Severity 1, the State will coordinate testing and release of the patch with contacts designated by the Steering Committee. Patches necessary to restore the HMIS application to functioning status will be released as necessary in between regular development lifecycles.
- Non-essential change requests, incorporated into a Change Management Proposal, will be reviewed and prioritized by the Executive Committee for packaging into a new development lifecycle release approximately every 2 to 4 months for a minimum of 2 and maximum of 6 releases per year.
- The State, Adsystech and the Executive Committee can agree to develop and implement non-Severity 1 interim patches to the HMIS application in between lifecycle releases in order to respond to application issues

or unanticipated business needs that cannot wait for the regular development schedule. In principle, interim patches should be infrequent and should not impact the regular development budget and schedule

- The Executive Committee will communicate at least once each month to review and prioritize open issues and feature requests tracked by the State, either by email, phone, videoconference, or in-person meetings. Adsystech may perform minor enhancements between lifecycle releases based on prioritization by the Steering Committee.
- The State will update the Executive Committee on issue resolution timeframes and will immediately advise them whenever resolution will take longer than original estimates.

SOP#: 03-009 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS DATA COLLECTION REQUIREMENTS**

Policy: All agencies that provide homeless services are encouraged, and in some case required, to collect data on for all clients served by their programs, as specified by this policy.

Standard: The Partner Agency will develop an interview protocol that facilitates the collection of the required data elements over time, beginning with some elements at intake and others over time.

Purpose: To ensure that agencies understand the data collection requirements set by the Sponsoring Partner's.

Scope: Partner Agencies

Responsibilities:

UNIVERSAL DATA ELEMENTS

The Partner Agency is responsible for ensuring that a minimum set of data elements, referred to as the Universal Data Elements, will be collected and/or verified from all clients at initial program enrollment or as soon as possible thereafter. Direct Entry Partner Agencies must enter data into the SAFE HARBORS HMIS within seven (7) days of collecting the information. Data Integration Partner Agencies must ensure that the information is captured within seven days in an information system that can generate the information in the prescribed format. Data integration Partner Agencies must upload data to Safe Harbors by the 5th of every month.

The universal data elements are all included in the Central Intake Library and the Client Services Library. They include:

- First, Middle, Last Name, and Suffix
- Social Security Number
- Date of Birth or estimated Date of Birth (age)
- Ethnicity and Race
- Gender
- Veteran Status
- Disabling Condition (Unless presence of a disability is a condition of program enrollment, disability status must be collected after program admission.)
- Housing Status
- Residence Type Prior to Program Entry
- Zip code of last Permanent Residence
- Program Entry and Exit Dates
- Household Affiliation for the purposes of this Program Enrollment

Partner agencies must report client-level data for the universal data elements using the required response categories detailed in Exhibit 3: Required Response Categories for Universal Data Elements of the HUD Data and Technical Standards Final Notice. These standards are already incorporated into the SAFE HARBORS HMIS for Direct Partner Agencies and will be incorporated into the Interface specifications for Interface Partner Agencies and Anonymous HMIS Data Submittal Partner Agencies.

PROGRAM-SPECIFIC DATA ELEMENTS

All City-funded and Continuum-funded Partner Agencies are also responsible for ensuring that the following assessment data elements, referred to as Program-Specific Data Elements, are collected from all clients that are served by the City or Continuum funded programs. These program-specific data elements must be entered into the SAFE HARBORS HMIS (or alternative approved information system for Interface Partner Agencies) within seven days of collecting the information. The timeframes for data collection are included for each data element.

The Program-specific Data Elements are located throughout the SAFE HARBORS HMIS application. Additional information on their location within the SAFE HARBORS HMIS will be provided as part of the SAFE HARBORS HMIS training materials. They include:

- Income Sources and Amounts (Program Entry and Exit);
- Source of Non-cash benefits (Program Entry and Exit);
- Presence of Physical Disability (Program Entry);
- Presence of Developmental Disability (Program Entry);
- HIV Positive or AIDS Diagnosis (Program Entry);
- Mental Health Status and Chronicity (Program Entry);
- Presence of Substance Addictions and Chronicity (Program Entry);
- Domestic Violence (Program Entry);
- Services Received (Throughout Program Enrollment);
- Referrals Provided (Throughout Program Enrollment)
- Destination upon Leaving Program (Program Exit);
- Reasons for Leaving (Program Exit);
- Program Outcomes* (Throughout Program Enrollment or at Program Exit); and

HSD and Continuum Partner agencies must provide client-level data for the program-specific data elements using the required response categories detailed in Exhibit 4: Required Response Categories for Program-Specific Data Elements of the HUD Data and Technical Standards Final Notice. For the program-specific data elements marked with an asterisk (*), use the response categories specified in the quarterly HSD reports that correspond to the appropriate HSD contract. These standards are already incorporated into the SAFE HARBORS HMIS for Direct Partner Agencies and incorporated into the interface specifications for Data Integration Partner Agencies.

HSD maintains its right to amend its minimum required data elements through its grant contract process independent of this SOP.

DV ANONYMOUS HMIS DATA SUBMITTAL PARTNER AGENCY DATA COLLECTION REQUIREMENTS

Note that this section should not be considered final, and may be revised as a result of the specific discussions between DV programs, the Sponsoring Partners, Continuum, and Adsystech.

[Data Collection is defined as: a) obtaining client information at the Agency through interview of and/or service provision to the client; and b) the storing of client information at the Agency in paper or electronic format.

Anonymous Client-level Data are defined as individual client records that contain no personal client identifying information, in whole or in part, or any information that may be used to deconstruct a person's identity. No one beyond the originating agency will have access to any client personal, identifying information, nor will identifying data be entered into the Safe Harbors HMIS.

Client personal identifying information NOT to be entered is defined as the following data fields:

- Name(s) or Aliases
- Social Security Number
- Date of Birth
- Mother's Maiden Name
- Unique Identifying Characteristics
- Address-specific Residence Prior to Program
- Unique Person Identifier*
- Any other data fields that may be used to leverage the identity of any individual client.

*A unique client identifier shall be assigned by the Agency to each client. The unique client identifier shall not contain any masked client personal identifying information. The unique client identifier shall not contain, in whole or in part, any client personal identifying information as listed above in fields a) through f). The unique client identifier provides an unduplicated internal count of clients served by the Agency, and provides the Continuum and HSD the means of conducting longitudinal analysis of services provided to each client.

With this option, the Agency will submit Anonymous Client-level Data to the Continuum and/or the Sponsoring Partners in an electronic format, according to the technical specifications developed by the Continuum and the Sponsoring Partners.

SOP#: 03-010 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS CENTRAL INTAKE DATA SHARING**

Policy: Universal Data Elements sharing among agencies will be supported by participating agencies.

Standard: Direct Entry Partner Agencies will share consented client records containing basic client demographic data.

Purpose: To formalize the vehicle through which agencies can enter into an agreement allowing such agencies to share client records.

Scope: Partner Agencies wishing to participate in SAFE HARBORS HMIS.

Role of Executive Director: The executive director is responsible for ensuring that users within his/her agency abide by all the policies stated in the Agency Partner Agreement.

- Only authorized users will have SAFE HARBORS HMIS access, controlled by user ID and password.
- Each user's access to data will be defined by their user type. Users will only be able to see data categories viewable by their respective user level, regardless of information sharing privileges within an agency or network.
- SAFE HARBORS HMIS System Administrator will need to "authorize" data sharing between agencies within a network before the agencies can begin sharing client information. This authorization will not be granted unless the SAFE HARBORS HMIS Partner Agency has an executed Interagency Data Sharing Agreement on file to share with another Partner with an executed Interagency Data Sharing Agreement.
- When a client record is set-up to be accessed by a user at another agency, the originating user must verify client authorization and indicate time period for data sharing.
- Users will only be able to view client data for clients enrolled in a program within their Agency until such time as an executed agreement is in place.
- Protected information (HIV/AIDS and domestic violence incident information) will not be within a network. This information will only be viewable by users at the originating agency.
- Random file checks for appropriate client authorization, audit trails, and other monitoring tools may be used to monitor that this data sharing procedure is followed. Specific monitoring procedures around program enrollment will be implemented to ensure appropriate client information access.

SOP#: 03-011 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS INFORMATION SHARING REFERRAL PROCEDURES**

Policy: Agencies will be able to share client information with agencies outside of their Interagency Network with appropriate written client authorization.

Standard: For Partner Agencies to share client information with agencies outside of their Interagency Network, a client must provide a written release of information for referral purposes.

Purpose: To formalize the vehicle through which agencies can share data outside of their Interagency Network Agreements.

Scope: Partner Agencies wishing to share client-level data outside of an Interagency Network.

Responsibilities:

Role of Executive Director: The executive director is responsible for establishing and ensuring compliance of all client notification and consent policies stated in the Client Release of Information for Referrals form. Any client information stored in the client record of an originating agency may be shared with another Partner Agency based on a written client release of information.

Client Authorization: SAFE HARBORS HMIS Users may only share client information if the client provides informed consent for that sharing with a valid Client Release of Information for Referrals form.

Informed consent means that a client is informed by an agency of options for participating in a Homeless Management Information System and then specifically asked to consent to have their identifying information entered and shared at a regional level. According to Washington State law (RCW 43.185C.180), all clients must be informed of their options for participating in an HMIS and must consent in writing that they understand the options and risks of participating or sharing data in an HMIS. Clients who are 18 years of age or older and *unaccompanied* clients who are under 18 must sign a consent form. A head of household can sign a form for the minors in the household and should list the names of the minors on the form in the space available. These documents are then kept on file at the agency from which the client is receiving services. Safe Harbors data will never be used to eliminate services being received, shared with law enforcement (accept when applicable by law) or used in any way other than to improve homeless housing and supportive services. Consented data helps the community better understand the needs of clients and is used to improve services throughout King County.

If a person provides consent, the first name, last name, and Social Security number should be entered, as well as all other required data elements. This means a **full** name (not initials), **full** date of birth (day, month and year) and Social Security number if the client is willing to provide it. This record will be kept at a system level and can be searched by programs outside of the originating agency through the HMIS Client Services Search.

Although data sharing privileges may be established through these actions, authorized users are only able to view client information beyond the universally shared identifiers for clients that they enroll in a program within their agency.

Data Sharing protocol will be reinforced by the following technical mechanisms:

- Only authorized users will have SAFE HARBORS HMIS access, controlled by user ID and password.
- Each user's access to data will be defined by their user group. Users will only be able to see data categories viewable by their respective user group, regardless of information sharing privileges within an agency or network.
- When a client record is set-up to be accessed by users at another agency, the originating user must obtain client authorization, indicate time period for data sharing, and specify data categories to be shared.
- Users will only be able to view client data (beyond the universally shared identifiers) for clients enrolled in a program within their Agency.
- Random file checks for appropriate client authorization, audit trails, and other monitoring tools may be used to monitor that this data sharing procedure is followed. Specific monitoring procedures will also be implemented to ensure that clients are being appropriately enrolled in programs.

SOP#: 03-012 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS USER CERTIFICATION POLICY**

Policy: User certification is required.

Standard: All Users will be certified to use the SAFE HARBORS HMIS within 90 days of initial training. Recertification is required once a year thereafter.

Purpose: To ensure that all users have the tools and training to use the SAFE HARBORS HMIS effectively and in accordance with requirements.

Scope: All users

Responsibilities:

The Users Certification Survey is available on the Safe Harbors website for staff to access independently.

Users taking the Survey may use all tools available to them in order to obtain correct answers. The HMIS Users Guide, Safe Harbors website, Standard Operating Procedures, discussions with coworkers, or making use of the Safe Harbors help desk are all acceptable during completion of the Survey.

There are 3 levels of Certification.

Level 1 is the User level. Tier 1 is a basic data entry level. Tier 2 is an advanced level of system usage.

There are 29 questions in the Level 1 Certification Survey. Of those questions, the user must score a minimum of 75% in each level to certify. Tier 1 has 20 questions so in order to qualify for Tier 1, 15 answers must be correct. To qualify for Tier 2, 6 of the 9 questions must be correct.

Level 2 is the Reports Writer. Persons certified at this level are able to access Management and Application reports, as well as create Adhoc reports. Specific certification survey and requirements for this level are forthcoming.

Level 3 is the Agency System Administrator. This person is considered the Agency lead for Safe Harbors. Agency staff should contact their Administrator with issues before contacting Safe Harbors. Specific certification survey and requirements for this level are forthcoming.

Safe Harbors Agency Support staff have the right to revoke system access of any Agency staff member who consistently produces bad data due to incorrect use of the system and processes during enrollment, services recording, or exiting clients.

SECTION 4

SECURITY POLICIES & PROCEDURES

SOP#: 04-001 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **HMIS SYSTEM ACCESS CONTROL POLICIES & PROCEDURES**

Policy: SAFE HARBORS HMIS Management must reasonably secure the system from access from unauthorized users.

Standard: SAFE HARBORS HMIS Management or its designee should employ access prevention and physical access control measures to secure SAFE HARBORS HMIS system resources.

Purpose: To protect the security of the SAFE HARBORS HMIS system resources.

Scope: SAFE HARBORS HMIS Management and Agency Technical Administrators

Guidelines:

CENTRAL SAFE HARBORS HMIS EQUIPMENT ACCESS PREVENTION MECHANISM

All computing resources will be protected at all times by a firewall. User access through the Internet will be controlled using workstation and user authentication at all times. Physical access to the system data processing areas, equipment and media must be controlled commensurate with the threat and exposure to loss. Available precautions include equipment enclosures, lockable power switches, equipment identification and fasteners to secure the equipment.

The SAFE HARBORS HMIS Management Team will determine the physical access controls appropriate for the environment housing the central SAFE HARBORS HMIS equipment based on SAFE HARBORS HMIS security policies, standards and guidelines. All those granted access to an area or to data are responsible for their actions. Additionally, if an individual gives access to another person, the authorizing individual is responsible for the other person's activities.

WORKSTATION ACCESS CONTROLS

Access to the SAFE HARBORS HMIS will only be allowed from computers specifically identified by the Executive Director and Agency Technical Administrator of the Participating Agency. Laptops will require an additional security form stating that use will not be for unauthorized purposes from unauthorized or inappropriate locations. Laptops should not use unprotected, public locations to access the SAFE HARBORS HMIS for security and privacy purposes.

Access to SAFE HARBORS HMIS computer workstations should be controlled through physical security measures and/or a password. Each Agency Technical Administrator will determine the physical access controls appropriate for their organizational setting based on SAFE HARBORS HMIS security policies, standards and guidelines. Each workstation should meet appropriate and current security protection, as specified in SOP 02-004: SAFE HARBORS HMIS Hardware, Connectivity, and Security Requirements. If an agency accesses the SAFE HARBORS HMIS through a network, all workstations on that network must be protected by similar measures. An agency using or considering a wireless internet configuration must employ higher security measures, as described in SOP 02-004: SAFE HARBORS HMIS Hardware, Connectivity, and Security Requirements.

SOP#: 04-002 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS DATA ACCESS CONTROL POLICIES & PROCEDURES**

Policy: SAFE HARBORS HMIS Management must reasonably secure the SAFE HARBORS HMIS data from access from unauthorized users.

Standard: SAFE HARBORS HMIS Management or its designee should employ access prevention control measures to secure SAFE HARBORS HMIS database resources.

Purpose: To protect the security of the SAFE HARBORS HMIS database(s).

Scope: SAFE HARBORS HMIS Management and Agency Administrators

Guidelines:

USER ACCOUNTS

Agency Administrators and the SAFE HARBORS HMIS System Administrator must follow the procedures documented in Section 2 for user account set-up, including verification of eligibility, appropriate training, and establishment of appropriate user type. Each user's access to data should be defined by their user group and specific agency data-sharing agreements. Agency Administrators must regularly review user access privileges and terminate user IDs and passwords from their systems when users no longer require access. It is the responsibility of the user's supervisor to notify the Agency Technical Administrator immediately when a user leaves the agency or no longer requires access to the SAFE HARBORS HMIS system.

Unless otherwise terminated or suspended, a user account is valid for one year. The Agency Administrator must annually reauthorize a user to maintain system and database access. Users may be required to attend supplemental training prior to reauthorization.

The Agency Administrator should terminate the rights of a user immediately upon termination from their current position. It is the responsibility of the user's supervisor to notify the Agency Administrator immediately when a user leaves the agency. The Agency Administrator is responsible for removing users from the system. If a staff person is to go on leave for a period of longer than 30 days, their account should be temporarily suspended within 5 business days of the start of their leave. It is the responsibility of the user's supervisor to notify the Agency Administrator when the user will be on leave for a period longer than 30 days. Users should only be logged into the SAFE HARBORS HMIS from one workstation at any given time.

USER PASSWORDS

Each user must have a unique identification code (user ID). Each user's identity will be authenticated using a user password. Passwords are the individual's responsibility. Users are prohibited from sharing user IDs or passwords. Sanctions will be imposed on the user and/or agency if user account sharing occurs.

A temporary password will be automatically generated from the system when a new user is created. Agency Administrators will communicate the system-generated password to the user. The user will be asked to establish a permanent password at initial log-in.

Users will be able to select and change their own passwords, and must do so at least every ninety days. A password cannot be re-used until 2 password selections have expired.

Passwords should be between eight and sixteen characters long and not easily guessed or found in a dictionary. The password format is alphanumeric.

Any passwords written down must be securely stored and inaccessible to other persons. Users should not save passwords on a personal computer for easier log on.

PASSWORD RESET

Users can reset their own passwords at any time using the self-serve functionality of the SAFE HARBORS HMIS application. The System Administrator and Help Desk support will have the ability to temporarily reset a password during business hours.

TEMPORARY SUSPENSION OF USER ACCESS TO DATABASE RESOURCES

System Inactivity: Users must logoff from the SAFE HARBORS HMIS and workstation if they leave their workstation. SAFE HARBORS HMIS Management has established inactivity time-out thresholds to be implemented by the vendor, where technically feasible, for terminals and workstations that access SAFE HARBORS HMIS information. Therefore, if a user is logged onto a workstation, and the period of inactivity on the workstation exceeds the designated inactivity time period. The user will be automatically logged off of the system. This occurs after ten minutes of inactivity.

Unsuccessful logon: If a User unsuccessfully attempts to logon three times, the User ID will be "locked out", access permission revoked and unable to gain access until their password is reset by the SAFE HARBORS HMIS Management.

ELECTRONIC DATA CONTROLS

Agency Policies Restricting Access to Data: The Partner Agencies must establish internal access to data protocols based on the final HUD Data and Technical Standards.

Raw Data: Users who have been granted access to the SAFE HARBORS HMIS Report Writer tool have the ability to download and save client level data onto their local computer. Once this information has been downloaded from the SAFE HARBORS HMIS server in raw format to an Agencies computer, this data then becomes the responsibility of the agency.

Ability to export Agency specific Database from SAFE HARBORS HMIS: Partner Agencies will have the ability to export a copy of their own data for internal analysis and use. Agencies are responsible for the security of this information.

HARDCOPY AND DIGITAL DATA CONTROLS

Printed versions (hardcopy) of confidential data should not be copied or left unattended and open to compromise. Media containing SAFE HARBORS HMIS client identified data may not be shared with any person or agency other than the owner of the data for any reason not disclosed within the Client Notice.

Agencies policies, consistent with applicable state and federal laws, should be established regarding appropriate locations for storage, transmission, use and disposal of SAFE HARBORS HMIS generated hardcopy or digital data. SAFE HARBORS HMIS data may be transported by authorized employees using methods deemed appropriate by the participating agency that meet the above standard. Reasonable care should be used, and media should be secured when left unattended. Magnetic media containing SAFE HARBORS HMIS data which is released and/or disposed of from the participating organization and central server should first be processed to destroy any data residing on that media. Degaussing and overwriting are acceptable methods of destroying data. SAFE HARBORS HMIS information in hardcopy format should be disposed of properly. This may include shredding finely enough to ensure that the information is unrecoverable.

SOP#: 04-003 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS AUDITING POLICIES & PROCEDURES**

Policy: SAFE HARBORS HMIS Management and Agency Administrators will monitor system and database access that could potentially reveal a violation of security protocols.

Standard: SAFE HARBORS HMIS Management or its designee and Agency Administrators will implement a monitoring plan to monitor compliance with data security standards.

Purpose: To protect the security of the SAFE HARBORS HMIS system and databases.

Scope: SAFE HARBORS HMIS Management and Agency Administrators

Guidelines:

ACCESS MONITORING PLAN

The SAFE HARBORS HMIS application must maintain an audit trail that tracks user log-in attempts, for a minimum of six months. The SAFE HARBORS HMIS application must also maintain an audit trail that tracks to deletions to client records (including the actual assessment entry, date deleted, and username) for a minimum of six months and a record of deleted client records (case number, intake information, date deleted, and username) for a minimum of one year. The SAFE HARBORS HMIS application is designed to record transactional data on all other client information for historical and audit purposes. Each entry shall also reflect the user that created the entry and the date and name of the user that made the most recent modification.

The SAFE HARBORS HMIS Application Administrator must regularly review audit records for evidence of violations or system misuse. Audits may include reviews of user data activity to identify inactive users and reviews to determine instances of simultaneous user logins to identify user account sharing. The Agency Administrator must regularly review these logs for its agency's users to determine unauthorized or inappropriate access to SAFE HARBORS HMIS client records.

Agencies should also institute internal monitoring methods to ensure compliance with these SOPs. Agencies may be required to demonstrate that they are complying, and/or may be subject to technical and policy monitoring by the Continuum or City.

All users and custodians are obligated to report suspected instances of noncompliance and/or security violations to an Agency Administrator, the SAFE HARBORS HMIS System Administrator, and/or Application Administrator, as soon as possible.

All users and custodians are obligated to report suspected instances of noncompliance and/or security violations to an Agency Administrator, the SAFE HARBORS HMIS System Administrator, and/or Application Administrator, as soon as possible.

VIOLATIONS & SANCTIONS

All potential violations of any security protocols will be investigated by SAFE HARBORS HMIS management. Any user found to be in violation of security protocols will be sanctioned accordingly. Sanctions include, but are not limited to:

- A formal letter of reprimand;
- Suspension of system privileges;
- Revocation of system privileges;
- Termination of funding; and
- Criminal prosecution.

A Partner Agency's access may also be suspended or revoked if serious or repeated violation(s) of the SOPs occur by Agency users. All SAFE HARBORS HMIS sanctions will be imposed by a team comprised of a HMIS Executive Committee member, a HSD representative, and the SAFE HARBORS HMIS System Administrator. SAFE HARBORS HMIS sanctions can be appealed to a team comprised of the HSD Commissioner, the SAFE HARBORS HMIS Management, and the Continuum Sponsoring Partner's Co-Chairs. Employment and/or criminal prosecution sanctions will be recommended and/or imposed by a team comprised of the SAFE HARBORS HMIS management, HSD Management, the City Law Department, and the leadership of the Agency.

SECTION 5

DATA OWNERSHIP, USAGE AND RELEASE POLICIES & PROCEDURES

SOP#: 05-001 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS UNDUPLICATION POLICIES & PROCEDURES**

Policy: The Seattle Continuum will employ a range of methods to achieve unduplication to accommodate the unique situations of different provider types.

Standard: The SAFE HARBORS HMIS and SAFE HARBORS HMIS Trainer shall train users on and employ the methods described below to achieve the highest degree of unduplication possible while also respecting the other privacy and security policies within these SOPs.

Purpose: To define the overall unduplication approach.

Scope: System-wide.

Guidelines:

UNDUPLICATION DATA ELEMENTS:

The SAFE HARBORS HMIS application will use the following data elements to create unduplicated client records:

- Name (first, middle initial, last, suffix, alias)
- DOB (actual or estimated)
- Gender
- Race and Ethnicity
- SSN (full or partial)
- Unique Characteristics (e.g. tattoos)
- Veteran's status

The primary way to achieve unduplication will be a provider-mediated search of the client database prior to creating a new client record. The user will be prompted to enter a minimum number of data elements in the SAFE HARBORS HMIS, and a list of similar client records will be displayed. Based on the results, the user will be asked to select a matching record if the other identifying fields match correctly. If the user is unsure of a match (either because some data elements differ or because of blank information), the user should query the client for more information and/or create a new client record. The user will not be able to view sensitive client information or program-specific information during the unduplication process. After the client record is selected, the user will only be able to view the previously existing portions of the client record if he/she has explicit authorization to view that client's record, as described in SOP 03-006: SAFE HARBORS HMIS Client Notification Policies and Procedures.

For providers that do not directly enter data in the SAFE HARBORS HMIS, the unduplication will occur on the back-end using the same client identifiers and/or a masked ID generated from these identifiers. Data from Data Integration Partner Agencies becomes part of the real-time SAFE HARBORS HMIS client database with all client data limited to the organization access level only.

UNDUPLICATION METHODS

Soundex is a tool that codes together surnames of the same and similar sounds but of variant spellings. The goal is for similar client names to be encoded to the same representation (MasterID) so that they can be matched despite minor differences in spelling. The algorithm that makes this work mainly encodes consonants; a vowel will not be encoded unless it is the first letter. This allows the HMIS system to assign the same MasterID to clients that may have been slightly misspelled or have a middle initial on one record and not the other.

Agency Type	Provider-mediated Look-up*	Backend Central Server Matching based on Identifiable Information	Backend Central Server Matching based on Masked Identifier**	Submittal of Unduplicated Anonymous Client-level Program Data	Data Storage Location (Program, Agency, or Server
Direct Entry Partner Agencies	Yes	Yes	Yes	Yes	Server
Providers who upload periodic client data	No	Yes	Yes	Yes	Server
DV Providers*	No	No	No	Yes	Server
HIV/AIDS Providers*	No	No	No	Yes	Server

* De-identified client records will not be searchable as part of the provider-mediated look-up. Mainstream providers will be trained on the use of de-identified client records for use with victims of domestic violence, People living with HIV AIDS and/or other clients who deny the right to share their personal information. De-identified records will be analyzed using extrapolation processes.

DEFINITIONS:

Provider-mediated look-up: Prior to beginning a new client record, the intake worker or data entry person will search for an existing client record using the unduplication fields indicated earlier in this SOP.

Refused Client Data Entry: Primary identifiers are not entered into SAFE HARBORS HMIS, as described in SOP 03-006: SAFE HARBORS HMIS Informed Consent Procedures.

Backend Central Server Master ID creation: Adsystech will manage a computer-aided process of matching client personal identifying information at the central server level and assigning a common personal identification number to records with similar identifiers for unduplication purposes. This scenario will be used to unduplicate client records. The process will also be used to validate data received from all users, as human error and decisions may introduce error to the provider-mediated look-up process.

SOP#: 05-002 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS DATA QUALITY STANDARD POLICIES & PROCEDURES**

Policy: All data entered into the SAFE HARBORS HMIS and/or Continuum for analytical or reporting purposes must meet the data quality standards.

Standard: The data entered into the SAFE HARBORS HMIS must meet an 80% complete data quality standard to maintain compliance with SAFE HARBORS HMIS requirements.

Purpose: Identify the responsibilities of all parties with the CoC that affect data quality; Establish specific data quality benchmarks for timeliness, completeness, and accuracy; Describe the procedures that the HMIS Lead Agency will take to implement the plan and monitor progress to meet data quality benchmarks and; Establish a timeframe for implementing the plan to monitor the quality of data on a regular basis.

Scope: All programs participating in Safe Harbors.

Guidelines:

DEFINITION OF DATA QUALITY

Data quality refers to the validity and reliability of the client data collected in Safe Harbors HMIS. It reflects the extent to which data in Safe Harbors reflects actual information in the real world. Data quality is comprised of three parts, data timeliness, data completeness, and data accuracy.

Good data quality allows our continuum to get an accurate picture of people served in homeless and prevention programs. Data quality is essential to completing HUD reports, such as the Annual Homeless Assessment Report (AHAR), PULSE, Homelessness Prevention and Rapid Re-Housing Program (HPRP) Quarterly Progress Report (QPR), and APR (Annual Performance Report) as well as other funder reports such as Transitional Housing, Operating, and Rent (THOR) Program reports and Emergency Shelter Homeless Prevention (ESHP) reports.

KEY SUPPORTING DOCUMENTS

- Housing and Urban Development (HUD) Homeless Management Information System (HMIS) Data and Technical Standards Revised Notice, March 2010
- HUD Notice on VAWA (March 2007)
- HUD Supportive Housing Program (SHP) Annual Progress Report (APR)
- HUD Supportive Housing Program (SHP) An Introductory Guide to the Annual Homeless Assessment Report (AHAR), October 2010
- HUD Supportive Housing Program (SHP) Notice of Funding Availability (NOFA)

KEY DEFINITIONS

- Data Integration: Data integration (DI) is the process of uploading data from legacy and supporting systems into the Safe Harbors system. Data Integration agencies do not enter data directly into Safe Harbors, but upload it on a monthly basis.
- Record: A record in Safe Harbors is a collection of Universal Data Elements (UDE), Program Specific Data Elements (PDE) and local data elements that meet the requirements of funding sources.
- Universal Data Elements (UDEs): Baseline data collection that is required for all programs reporting data into the HMIS. HUD's Universal Data Elements are set forth in the HMIS Data Standards Revised Notice, March 2010, Data Elements 3.1 – 3.15.
- Program Specific Data Elements (PDEs): Data provided about the characteristics of clients, the services that are provided, and client outcomes. These data elements must be collected from all clients served by programs that are required to report this information to HUD. HUD's Program-specific Data Elements are set forth in HMIS Data Standards Revised Notice, March 2010, Data Elements 4.1 – 4.15

DATA QUALITY STANDARDS

Data Timeliness Rationale: The purpose of timeliness is to ensure data is accessible for reporting and monitoring purposes and to improve data accuracy.

Standard: Agencies will be expected to follow the data timeliness standards designated for their program type.

Direct Entry Agencies

Program Type	Data Timeliness Standard
Emergency shelter	All Universal Data Elements entered within two days of intake
Transitional Housing	All Universal and Program-Specific Data Elements entered within seven days of intake
Permanent Supportive Housing	All Universal and Program-Specific Data Elements entered within seven days of intake
HPRP	All Universal and Program-Specific Data Elements entered within two business days of intake
Service only	All Universal and Program-Specific Data Elements entered within two business days of intake

Data Integration Agencies

Program Type	Data Timeliness Standard
Emergency shelter	All Universal Data Elements uploaded by the fifth business day of the month following the reporting period. For example, data for the month of March must be uploaded into HMIS by the fifth business day of April.
Transitional Housing	All Universal and Program-Specific Data Elements uploaded by the fifth business day of the month following the reporting period

Permanent Supportive Housing	All Universal and Program-Specific Data Elements uploaded by the fifth business day of the month following the reporting period
HPRP	All Universal and Program-Specific Data Elements uploaded by the fifth business day of the month following the reporting period
Service only	All Universal and Program-Specific Data Elements uploaded by the fifth business day of the month following the reporting period

DATA COMPLETENESS

Rationale: The purpose of data completeness is to ensure that our community has the ability to produce accurate unduplicated counts of people served and to fully understand the demographic characteristics and service patterns of clients accessing homeless and preventions services.

Standard: All data entered into HMIS is complete.

All Clients Served: 100% of clients in Safe Harbors participating programs have a record entered in HMIS.

Universal Data Elements: All programs have 80% complete data for the Universal Data Elements. Complete data does not include missing, 'Don't know' or 'Refused' answers.

Program Specific Data Elements: All programs have 80% complete data for the Universal Data Elements. Complete data does not include missing, 'Don't know' or 'Refused' answers.

Bed Utilization Rate: Bed Utilization in HMIS accurately reflects the number of people being served on a given night. The general standard for bed utilization is between 50% and 105%.

DATA ACCURACY/CONSISTENCY

Rationale: The purpose of data accuracy/consistency is to ensure that data is understood, collected, and entered consistently across all programs in Safe Harbors HMIS. If users are not collecting data in a consistent way, then the data may not truly represent the clients being served.

Standard: All data in Safe Harbors HMIS shall be collected and entered in a common and consistent manner across all programs.

- Access to Documents: Safe Harbors staff will make the Central Intake Form available to all users through the HMIS Management Reports. Safe Harbors will post and update the 'HUD Data Standards Data Definitions' document on the Safe Harbors' website for all HMIS users as a quick reference to ensure consistent data collection. Safe Harbors staff will also send out regular data quality e-mails that will provide information on data consistency/accuracy. All users will be expected to review the reference document as well as the HUD Data Standards to ensure consistency in data entry.
- Training and Certification: All users will complete basic HMIS training before beginning to enter data. All HMIS users will be expected to recertify their knowledge of consistency practices on an annual basis.

- Safe Harbors' staff will do periodic reviews of the data and contact programs that appear to demonstrate inconsistency in data collection.

MONITORING

Data Monitoring Rationale: The purpose of data monitoring is to ensure the standards on data timeliness, completeness, and consistency/accuracy are met to the greatest extent possible and that data quality issues are identified and resolved quickly.

Standard:

- Access to the Data Quality Standard: Safe Harbors staff will post the Data Quality Standard to the Safe Harbors' website.
- Access to Data Quality Reports: Safe Harbors staff will post the Data Quality Report on the Safe Harbors' website by the 20th of each month.
- Monthly Review by Safe Harbors: Safe Harbors staff will review data on a monthly basis and contact programs who appear to be struggling to meet the data quality standards. Safe Harbors' staff will work with the program staff to identify additional training needs.
- Monthly Review by Contract Monitors: Contract monitors will review data in Safe Harbors HMIS and compare it to invoices they receive from program staff.

INCENTIVES

Rationale: The purpose of incentives is to reinforce the importance of good data quality and reward programs that are meeting the Data Quality Standards.

Standard: Programs that meet the Data Quality Standards may receive bonus points in McKinney and local funding rounds. Programs may also be recognized at Safe Harbors Partners meetings or on the Safe Harbors' website.

Programs that do not meet the Data Quality Standards for more than one report period will be asked to write a corrective action plan that explains how they will improve their data. The program will submit the plan to Safe Harbors staff and their Contract Monitor who will monitor the program's progress.

AGREEMENT

Rationale: The purpose of agreement is to ensure that all Safe Harbors participating programs are aware and have agreed to the Safe Harbors' Data Quality Standards.

Standard: Upon adoption of the Data Quality Standards, all Safe Harbors participating users will be required to sign an agreement stating they will meet the Data Quality Standards to the best of their ability.

SOP#: 05-003 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS DATA OWNERSHIP POLICIES & PROCEDURES**

Policy: All data usage is governed by the owner's of the data.

Standard: Data entered into the SAFE HARBORS HMIS or submitted to the Continuum for the purposes of the HMIS initiative shall be considered owned by the client and agency that collected the information.

Purpose: To define data ownership.

Scope: System-wide.

Guidelines:

The client ultimately retains ownership of any identifiable client-level information that is stored within the SAFE HARBORS HMIS. If the client consents to share data, the client, or agency on behalf of the client, has the right to later revoke permission to share his/her data without affecting his/her right to service.

Identifiable client-level data may only be stored and accessed within the SAFE HARBORS HMIS in accordance with the informed consent procedures in SOP 03-003: SAFE HARBORS HMIS User Access Levels and SOP 03-006: Client Notification Policies & Procedures.

In cases where agencies and clients agree to share identifiable client-level data, this information may only be shared in accordance with SOP 03-006: SAFE HARBORS HMIS Client Notification Policies & Procedures, SOP 03-010: SAFE HARBORS HMIS Interagency Data Sharing, and SOP 03-011: SAFE HARBORS HMIS Information Sharing Referral Procedures

In the event that the relationship between the SAFE HARBORS HMIS and a Direct Partner Agency is terminated, the agency will retain ownership of the identifiable client-level data that has been submitted to the SAFE HARBORS HMIS. The SAFE HARBORS HMIS staff shall make reasonable accommodations to assist a Direct Partner Agency to export their data in a format that is usable in an alternative database. In this circumstance, any agency-entered client-level data must be de-identified in order to remain in the SAFE HARBORS HMIS database. This de-identified information shall remain available to Sponsoring Partners and Continuum for analytical purposes. For the purposes of de-identification, the personal identification number shall not be considered an identifying data element if it is not stored with any other personal identifiers.

SOP#: 05-004 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS DATA USES AND DISCLOSURES POLICIES & PROCEDURES**

Policy: All SAFE HARBORS HMIS stakeholders will follow the data disclosure Policies & Procedures to guide the use and disclose of client information stored in or generated by the SAFE HARBORS HMIS.

Standard: This policy establishes the Continuum-approved uses and disclosures for SAFE HARBORS HMIS client data.

Purpose: To define minimum standards for data disclosure.

Scope: System-wide.

Guidelines:

Each SAFE HARBORS HMIS Partner Agency must comply with the following Uses and Disclosures, as outlined in the standard SAFE HARBORS HMIS Notice of Uses and Disclosures. A Partner Agency has the right to establish additional uses and disclosures as long as they do not conflict with the Continuum-approved uses and disclosures.

PRIVACY NOTICE REQUIREMENT

Each Agency must adopt the standard Notice of Uses and Disclosures. Every agency must post the notice and/or provide a copy of the notice to each client, in accordance with SOP 03-006: SAFE HARBORS HMIS Informed Consent Procedures. If an agency maintains a public web page, the agency must post the current version of its privacy notice on the web page.

The Privacy Notice must:

- Specify all potential uses and disclosures of client personal information.
- Specify the purpose for collecting the information.
- Specify the time period for which the data will be retained at the agency and the method for disposing of it or removing identifiers from personal information that is not in current use seven years after it was created or last changed.
- State the process and applicability of amendments, and commit to documenting all privacy notice amendments.
- Offer reasonable accommodations for persons with disabilities and/or language barriers throughout the data collection process.
- Allow the individual the right to inspect and to have a copy of their client record and offer to explain any information that the individual may not understand.
- Specify a procedure for accepting and considering questions or complaints about the privacy and security policies and practices.

CONTINUUM-APPROVED USES AND DISCLOSURES

SAFE HARBORS HMIS client data may be used or disclosed for (1) case management, (2) administrative, (3) billing, (4) analytical purposes, and (5) other purposes as required by law. Uses involve sharing parts of client information with persons within an agency. Disclosures involve sharing parts of client information with persons or organizations outside of an agency.

Case Management Uses and Disclosures: Agencies may use or disclose client information for case management purposes associated with providing or coordinating services. Unless a client requests that his/her record remain hidden, personal identifiers will be disclosed to other SAFE HARBORS HMIS agencies so other agencies can easily locate the client's record if he/she goes to them for services. Beyond personal identifiers, each agency can only disclose client information with other agencies with written client consent.

Administrative Uses and Disclosures: Agencies may use client information internally to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions. Client information will be stored on a central citywide case management database; as such client information will be disclosed for system administration purposes to City employees or contractors who administer the central database.

Billing Uses and Disclosures include functions related to payment or reimbursement for services. An example might include generating aggregate reports for the people and organizations that fund an agency. A client's personal information may be disclosed for billing or reimbursement purposes, if required by the funder/billing agency.

Analytical Uses and Disclosures: Agencies may use client information for internal analysis. An example would be analyzing client outcomes to evaluate program effectiveness. Agencies will disclose client personal identifiers to the central system administrators for uses related to creating an unduplicated database on clients served within the system, ultimately resulting in the creation of de-identified personal information. Agencies may also disclose portions of a client's information without the personal identifiers for analytical purposes related to analyzing client data, including but not limited to understanding trends in homelessness and needs of persons who are homeless, and assessing the implementation of Seattle's 10-Year Plan to End Homelessness.

A client record will be stored on the SAFE HARBORS HMIS system with personal identifiers for a period of seven years from the time it was last modified. Beyond that point, all personally identifying information will be removed and the remaining information will only be retained in a de-identified format.

SOP#: 05-005 Prepared by: SAFE HARBORS HMIS

Approval Date:

Title: **SAFE HARBORS HMIS DATA RELEASE POLICIES & PROCEDURES**

Policy: All SAFE HARBORS HMIS stakeholders will follow the data release Policies & Procedures to guide the release of client information stored in or generated by the SAFE HARBORS HMIS.

Standard: Data must be categorized as confidential or internal unless it meets the data release policy.

Purpose: To define standards and circumstances for data release.

Scope: System-level Data (SAFE HARBORS HMIS Management)

Guidelines:

PROCEDURES FOR TRANSMISSION AND STORAGE OF DATA

All data must be classified and treated according to one of the following definitions. All of these data classifications are controlled by the data release criteria defined below.

Confidential Data: Confidential information is information that identifies clients contained within the database. Examples include social security number, name, address, or any other information that can be leveraged to identify a client. Specific identifiable data elements are described in SOP 03-009: Data Collection Requirements. Confidential data requires appropriate security and protection at all times as described in SOP 04-002: Data Access Control Policies & Procedures.

Internal Data: Internal data is any information that is scheduled, but not yet approved, for publication. Examples include draft reports, fragments of data sets, or data without context, accessible only to internal employees. No auditing is required. No special requirements around destruction of these data. These data must be stored securely and can be transmitted via internal or first class mail.

Public Data: Public data is any information that is published according to Data Release policies. Additional security controls are not required.

DATA RELEASE CRITERIA

SAFE HARBORS HMIS client data will only be released in aggregate or anonymous client-level data formats for purposes beyond those specified in SOP 05-004: SAFE HARBORS HMIS Data Uses and Disclosure Policies & Procedures, according to the criteria specified below,

CLIENT-IDENTIFIED DATA RELEASE CRITERIA:

No identifiable client data will be released to any person, agency, or organization that is not the owner of said data for any purpose other than those specified in SOP 05-004: SAFE HARBORS HMIS Data Uses and Disclosure Policies & Procedures without written permission from the owner.

Aggregate Data Release Criteria:

- All data must be anonymous, either by removal of all identifiers and/or all information that could be used to infer an individual or household's identity.
- Aggregate Data must represent sixty five percent (65%) of the clients in that universe (program, agency, subpopulation, geographic area, etc.), unless otherwise required for the Congressional AHAR.
- Only Partner Agencies can authorize release of aggregate, program-specific information beyond the standard reports compiled by HSD and the Continuum for funding purposes. There will be full access to aggregate data for all participating agencies.
- Parameters of the aggregate data (e.g. where the data comes from, what it includes and what it does not include) will be presented to each requestor of aggregate data.
- Released aggregate data will be made available in the form of an aggregate report or as a raw dataset.

Anonymous Client-level Data Release Criteria:

- All data must be anonymous, either by removal of all identifiers and/or all information that could be used to infer an individual or household's identity.
- Program specific information will not be released without the written consent of the agency executive director.
- Parameters of the data (e.g. where the data comes from, what it includes and what it does not include) will be presented to each requestor of data.

DATA RELEASE PROCESS

Beyond individual agency reports or County or Continuum reports on its funded programs, the Sponsoring Partners must jointly approve data for public classification and release.