

MEMO

**TO:** ESG and S+C Grantees; Agencies in the Balance of State Continuum of Care

**SUBJECT:** Homeless Management Information Systems (HMIS) Policy – Revised

**DATE:** March 7, 2011

Notwithstanding the HUD mandate for HMIS, the purpose of Georgia's collaborative HMIS program is to 1) assist homeless persons to navigate the continuum of care, 2) assist homeless service agencies with information allowing them to better serve clients, and 3) assist homeless agencies, local, state and Federal entities with information on numbers of homeless persons, reasons for homelessness, services required, services received, gaps in services, etc. Armed with this information, these entities will be able to do a better job of strategic planning and fundraising in order to meet the needs of homeless persons, and the public will be better informed on homeless issues. HMIS is mandated by HUD through the Continuum of Care process.

**Policy Update for DCA Grantees and Balance of State Continuum of Care Applicants**

**Participation Requirements**

- All DCA-funded agencies as well as any agencies receiving funding in the Balance of State Continuum of Care must actively participate in HMIS by meeting the Implementation Requirements defined herein and in more detail in the Standard Operating Procedures Manual available at <http://www.dca.ga.gov/housing/specialneeds/programs/documents/2010SOP.pdf>.
- Domestic Violence Agencies should not enter any data in the Pathways HMIS system but should collect equivalent data in the ALICE system and will receive guidance in a separate document.
- Grantees must provide basic profile information for each program created in the system and keep this information updated and accurate. All grantees **must** have separate HMIS programs for each of their emergency, transitional and permanent housing programs, even if the agency is not receiving DCA funding for the specific program. In addition, overflow beds and housing vouchers should each have a separate HMIS program. If a shelter or housing program is a scattered site program with beds across multiple continua, separate HMIS programs must be created for the beds in each continuum. For assistance with determining how to configure your HMIS programs, please contact Pathways.
- Authorization for HMIS should be attempted for 100% of persons who are "homeless" or near homeless regardless of whether or not they are served in programs receiving DCA funds. At a minimum, grantees are required to enter all DCA required data elements into the HMIS system for 75% or more of the total clients they serve and 75% of the clients enrolled *in each program*. For guidance on required data elements refer to the Georgia HMIS Standard Operating Procedures posted on the DCA website.
- Soup kitchen and other short term service programs that see large numbers of persons in poverty, including homeless persons, for limited periods of time are not necessarily expected to document all services provided but are expected to provide HMIS-compliant outreach in conjunction with those services in a reasonable way, as determined on a case-by-case basis by DCA.
- Shelter and housing programs are required to ensure that they enroll 100% of clients who have signed authorizations into the appropriate HMIS program within one week of program enrollment. In addition, clients must be discharged from the appropriate HMIS program within one week of their actual discharge. Date of enrollment and discharge within the HMIS system should reflect the actual dates of program enrollment and program discharge. Programs should be enrolling ALL family members that are staying in the program.
- Efforts should be made to document all key service transactions provided to clients. Permanent Supportive Housing (PSH) providers may be exempt from documenting service transactions through HMIS if all services are tracked using the DHR required client tracking system. However PSH providers are still required to track universal and program specific data elements and program enrollment and discharge through HMIS.

## HMIS Implementation Requirements

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- If the Grantee is not able to serve a particular client, the Grantee must make every effort to record “universal” data on the person into the HMIS and to make an appropriate referral to service providers based on the needs of the individual/family.
- In the event of conflict between federal, state and local government and/or local Continuum of Care HMIS policy, the higher standard must be met.
- All agencies must comply with the policies and procedures outline in the Georgia HMIS Standard Operating Procedures Manual ([http://www.dca.ga.gov/housing/specialneeds/programs/documents/GaHMIS\\_SOPmanual.pdf](http://www.dca.ga.gov/housing/specialneeds/programs/documents/GaHMIS_SOPmanual.pdf))
- All agencies must comply with the current HMIS Privacy, Confidentiality, and Security standards issued in the HUD Notice on 7/31/2004. These standards require, but are not limited to: installing virus protection software, with an automatic update on every computer that accesses HMIS; activating a locking screen saver on every computer that accesses HMIS; developing a data privacy policy and notice; posting the agency’s privacy notice on its premises and website (if one exists); installing an individual or network firewall; and posting “purpose for data collection” signs at each intake desk.
- Documentation of client authorization/refusal must be maintained in each clients file. Individuals refusing to authorize participation in HMIS should complete a Refusal form which should be kept in their case file. Information equivalent to the required HMIS data elements must be gathered and documented in the case file if an individual refuses to participate.
- DCA staff will monitor HMIS participation through periodic monitoring visits and ongoing review of data in the HMIS.
- Agencies must respond to written notification of HMIS Policy Violation within 30 days of receipt. Agencies should inform DCA in writing of how they have responded to the violation. Failure to comply with HMIS participation requirements may result in withholding of payments until compliance is documented, or termination of the grant(s). In addition, failure to comply with requirements may result in an agency being ineligible for funding in the next grant year.
- Future DCA funding and funding levels will be based, in part, on HMIS participation. Considerations will include, but not limited to, level of system utilization including, referrals for non-clients, service transactions, program enrollment (where applicable), ability to produce reports, data quality, etc.
- Grantees with ESG funds approved for housing support (case management) may utilize those funds for HMIS costs, including fees, basic software (virus protection/spyware, networking/firewall, operating system, productivity software such as MS Office, etc.) and Internet service if they have approval from DCA to do so.
- Although DCA will make every effort to inform Agencies when this policy is revised, it is the responsibility of the grantee to ensure they are in compliance with the current version of the HMIS Policy and Standard Operating Procedures.