GA HMIS
End User Participation Agreement

Agency Name (Please Print): _____

User Name (Please Print): _____

In this End User Participation Agreement, "Agency" refers to the agency named above. Agency recognizes the privacy of client needs in the design and management of the Georgia HMIS ("GA HMIS"). These include both the need to continually improve the quality of homeless and housing services with the goal of eliminating homelessness in our community, and the need to vigilantly maintain client confidentiality, treating the personal data of our most vulnerable populations with respect and care.

GA HMIS End Users ("Users") have a moral and a legal obligation to ensure that the data is being collected, stored, accessed and used appropriately. It is also the responsibility of each User to ensure that client data is only used for the purposes for which it was collected. Proper user training; compliance with the terms and conditions as stated in the User Agreement, and the GA HMIS Privacy Policy.

Relevant points regarding client confidentiality include:

- A client consent form must be signed by each client whose data is shared with a GA HMIS participating agency via the GA HMIS system. Users may not share client data with other GA HMIS participating agencies via the GA HMIS system without obtaining this written permission from the client.
- Client consent may be revoked by that client at any time by completing the GA HMIS Client Consent to Share Revocation Form at any GA HMIS participating agency.
- No client may be denied services for failure to provide consent for GA HMIS data sharing or collection.
- With the exception of case notes, Clients have a right to inspect, receive a copy of, and request changes to their GA HMIS records.
- Users will maintain GA HMIS data in such a way as to protect the identity of clients from further participating agencies, individuals or entities.
- Any User failing to protect client confidentiality as set forth in this User Agreement and the GA HMIS Privacy Policy, may be denied access to the GA HMIS.

I have received and read a copy of the GA HMIS End User Participation Agreement, the GA HMIS Privacy Policy (Appendix A), and the GA HMIS Policies and Procedures Manual and affirm the following (Appendix B):

1. I have received GA HMIS Privacy Policy.
2. I have read and will abide by the terms of the GA HMIS User Agreement, the GA HMIS Privacy Policy and the GA HMIS Policies and Procedures Manual.
3. I will maintain the confidentiality of client data in the GA HMIS as outlined above and as outlined in the User Agreement, the GA HMIS Privacy Policy, and the GA HMIS Policies and Procedures Manual.
4. I will only collect, enter, and extract data in the GA HMIS relevant to the delivery of services to homeless, at risk of becoming homeless, and formerly homeless people experiencing a crisis in our community.

_____   _____

End User Signature   Date

I authorize, as the Executive Director (or Designee) the aforementioned User to have access to the HMIS system for this designated agency.

_____   _____

Signature, Executive Director (or Designee)   Date

Due to the sensitive nature of the data stored in GA HMIS, each User is required to be trained in Privacy, Security and Confidentiality practices and End User Onboarding Training prior to being allowed access. These trainings are recorded and updated as necessary, and posted to http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp. Additionally, users will be able to find the training calendar which lists the availability of any live training, videos and webinars along with registration information.

To ensure that each user has been trained, GA HMIS staff tracks training attendance. Users who have not yet attended mandatory training are not permitted access to the system. GA HMIS staff realizes that in some cases, a user may need to be able to be trained quickly so as not to adversely affect their agency's ability to utilize GA HMIS. In the event a training is not offered and presents an undue hardship on a participating Agency that has limited staffing and was forced to wait for training. In these cases, new users may be trained by their respective GA HMIS CoC Admin (or designated Representative). The CoC Admin or designated Representative may use any materials posted by GA HMIS staff on http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp to assist them in providing a complete training consisting of Privacy, Security and Confidentiality, and system use appropriate with the user's needed access level. If the CoC Admin (or designated Representative needs to provide training in the stead of GA HMIS staff, the user's account will not be activated until the CoC Admin (or designated Representative completes this form and certifies that the user has been trained. Please note that the CoC Admin (or designated Representative does not need to complete this form for any users trained directly by GA HMIS staff or System Admin. Additionally, the CoC Admin (or designated Representative may only be trained by GA HMIS staff directly or by the System Admin. HMIS Lead users may only be trained by GA HMIS staff or System Admin staff.

I certify the aforementioned User has completed the required trainings necessary to access the HMIS system (complete if applicable).

_____   _____
Training completed   Date

_____   _____
Training completed   Date

_____   _____
Signature, CoC Admin (or Designee)   Date

This notice describes the privacy policy of the Georgia Homeless Management Information System ("GA HMIS"). GA HMIS is administered by the HMIS Lead Agency, the Georgia Department of Community Affairs ("DCA"), operating on behalf of the Georgia Housing and Finance Authority (GHFA). DCA administers GA HMIS on behalf of the regional homeless services planning bodies (individually referred to as "Continuum of Care" or "CoC" and collectively referred to as "The Collaborative" or "CoCs") in Georgia that participate in the statewide GA HMIS implementation. DCA may amend this GA HMIS Privacy Policy at any time, and will maintain a record of any changes made, as well as post new versions on the GA HMIS website located at http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp.

This notice applies to the personal information of individuals whose personal data is collected or maintained in hard copy or in electronic formats in the GA HMIS.

In relation to this personal information, users entering data in the GA HMIS:
- Collect personal client information only when appropriate or required by entities providing funding for homeless services ("the Funder or Funders");
- May use or disclose information in order to facilitate service delivery;
- May also use or disclose information to comply with legal requirements or other obligations as described in the notice;
- Will not disclose personal information without written consent unless specifically stated within the notice; and
- Assume that, unless stated otherwise, persons applying for or receiving services from one of the GA HMIS Participating Agencies agree to allow users of the GA HMIS to collect, use, or disclose information as described in this notice.

Each person providing personal information may:
- Inspect his/her personal information that is maintained in the GA HMIS, with the exception of case notes;
- Ask the agency entering data for the GA HMIS to correct inaccurate or incomplete information within the record;
- Ask about the GA HMIS' privacy policy or practices;
- File a grievance regarding GA HMIS' privacy policies and practices. DCA will respond to questions and complaints;
- Request a copy of this full notice for more details.

A. What this notice covers

1. This notice describes the privacy policy and practices of the GA HMIS, administered by DCA, which is the lead agency for the GA HMIS. DCA's main office is located at 60 Executive Park South, NE,

    Atlanta, GA 30329. DCA's phone number for purposes of GA HMIS is (404) 679-4840. Information about GA HMIS is on DCA's web site which is located at:
    http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp.

2. The policy and practices in this notice cover the processing of protected personal client information by users of the GA HMIS within The Collaborative. This notice covers all personal information policies set forth by DCA in its role as a program administrator for CoC programs and in its role as the administrator of the GA HMIS. GA HMIS Participating Agencies may have additional privacy policies on information entered and accessed by users.

3. Protected Personal information (PPI) is any information GA HMIS maintains about a client that:

    *   Allows identification of an individual directly or indirectly; **and**
    *   Can be manipulated by a reasonably foreseeable method to identify a specific individual; **or**
    *   Can be linked with other available information to identify a specific client.

    When this notice refers to personal information, it means PPI.

4. DCA and each CoC in The Collaborative have adopted this policy in accordance with the Homeless Management Information Systems Data and Technical Standards and subsequent HMIS notices issued by the U.S. Department of Housing and Urban Development (HUD) and their federal partners through the U.S. Interagency Council on Homelessness (USICH). DCA's policies and practices are consistent with those standards and with industry standard best practices. DCA's policies are also consistent with requirements outlined in other applicable state and local laws.

5. This notice informs clients, staff, contractors, GA HMIS Participating Agency users, Funders and others how personal information is processed by the GA HMIS Collaborative.

6. DCA may amend this notice and change the policy or practices at any time. Amendments may affect personal information that DCA or the GA HMIS Participating Agencies obtained before the effective date of the amendment. Any changes to this privacy policy will be posted as a notice at http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp.

7. DCA and/or GA HMIS Participating Agencies will provide a written copy of this notice to any individual or organization that requests one. DCA also maintains a copy of this notice on its website located at http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp.

B. How and Why We Collect Personal Information

1. DCA (including DCA's contractors), CoC Administrator Agencies (an agency other than DCA, duly authorized in writing by a respective CoC, to have an employee(s) with access to the client-level data of that specific CoC for purposes of system administration activities), and the GA HMIS Participating Agencies may collect and/or maintain personal information for some or all the following purposes:

   - To provide or coordinate services to clients;
   - To locate other programs that may be able to assist clients;
   - For functions related to payment or reimbursement from others for services provided by DCA or DCA's contractors;
   - To carry out administrative functions, including legal, audit, personnel, oversight, contract monitoring, program evaluation, and other management functions;
   - To comply with government and Funder reporting obligations;
   - For research, data analysis, and community reporting purposes, including reporting to the GA HMIS Steering Committee to inform policy decisions; and
   - When required by law.

2. DCA (including DCA's contractors), CoC Administrator Agencies, and the GA HMIS Participating Agencies use only lawful and fair means to collect and/or maintain personal information.

3. By seeking assistance at one of the GA HMIS Participating Agencies and providing personal information, it is assumed that a person consents to the collection of information as described in this notice and that the collected information may be entered into the GA HMIS.

4. DCA (including DCA's contractors), CoC Administrator Agencies, and the GA HMIS Participating Agencies may also obtain information about those seeking services from:

   - Other individuals who are accompanying the person seeking services, such as a guardian, caretaker, or advocate;
   - Referring organizations and/or service providers (with proper written consent);
   - DCA's contractors and/or GA HMIS Participating Agency users that are providing services.

5. GA HMIS Participating Agencies are required to post a sign at their intake desks or offices explaining the reasons personal information is requested. GA HMIS Participating Agencies may have additional policies not required by DCA that they must follow, but at a minimum, they must adhere to this Notice. While GA HMIS Participating Agencies are required to adopt their own privacy policies and postings for data collection unrelated to GA HMIS, DCA provides a posting template to GA HMIS Participating Agencies which reads:

Privacy Posting
Georgia Homeless Management Information System

The U.S. Department of Housing and Urban Development (HUD) and other federal and state partners require that each jurisdiction that receives homeless funding have a Homeless Management Information System (HMIS) in place. Therefore, this Agency is required to participate in the GA Homeless Management Information System (GA HMIS), a computerized system that collects and stores basic information about the persons who receive services from this Agency. The goal of the GA HMIS is to assist us in determining your needs and to provide a record for evaluating the services we are providing to you.

We only collect information that is needed to provide you services, or that we consider relevant to helping us understand the scope and dimensions of homelessness in order to design effective

service delivery. We do not use or disclose your information without written consent, except when required by our funders or by law, or for specific administrative or research purposes outlined in our privacy policy. By requesting and accepting services from this project, you are giving consent for us to enter your personal information into the GA HMIS.

The collection and use of all personal information is guided by strict standards of confidentiality as outlined in our privacy policy. A copy of our agency's Privacy Policy and a copy of the Georgia HMIS Privacy Policy is available upon request for your review.

C. Usage and Disclosure of Personal Information

1. ***DCA, CoC Administrator Agencies, and the GA HMIS Participating Agencies*** may use or disclose personal information for the following purposes:
   a) To provide or coordinate services for individuals to help them end their homelessness. GA HMIS may be used to share portions of client records (with written consent) with GA HMIS Participating Agencies that, at a minimum, must adhere to this notice and may have additional privacy policies and that may allow different uses and disclosures of the information;
   b) For functions related to payment or reimbursement for services;
   c) To carry out administrative functions, such as legal, audit, personnel, oversight, contract monitoring, program evaluation, and other management functions;
   d) When required by law to the extent that use or disclosure complies with and is limited to the requirements of the law.
   e) To avert a serious threat to health or safety if:
      - It is believed in good faith that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
      - The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

f) To report about an individual that DCA, a CoC Administrator Agency, or a GA HMIS Participating Agency reasonably believes to be a victim of abuse, neglect or domestic violence to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence under any of the following circumstances:

- where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law;
- if the individual agrees to the disclosure; or
- to the extent that the disclosure is expressly authorized by statute or regulation; and
- DCA, a CoC Administrator Agency, or a GA HMIS Participating Agency believes the disclosure is necessary to prevent serious harm to the individual or other potential victims; or
- if the individual is unable to agree because of incapacity, then a law enforcement or other public official authorized to receive the report must represent that the PPI for which disclosure is sought is not intended to be used against the individual, and must represent that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure; and
- when DCA, a CoC Administrator Agency, or a GA HMIS Participating Agency makes a permitted disclosure about a victim of abuse, neglect or domestic violence, DCA, the CoC Administrator Agency, or the GA HMIS Participating Agency will promptly inform the individual who is the victim that a disclosure has been or will be made, except if:
  i. in the exercise of professional judgment DCA, the CoC Administrator Agency, or the GA HMIS Participating Agency believes informing the individual would place the individual at risk of serious harm, or
  ii. DCA, the CoC Administrator Agency, or the GA HMIS Participating Agency would be informing a personal representative (such as a family member or friend) and reasonably believe the personal representative is responsible for the abuse, neglect or other injury; such that informing the personal representative would not be in the best interests of the individual as DCA determines in the exercise of professional judgment.

g) To a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under the following circumstances:

- In response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena;
- If the law enforcement official makes a written request for PPI that:

        i.   is signed by a supervisory official of the law enforcement agency seeking the PPI;

        ii.   states that the information is relevant and material to a legitimate law enforcement investigation;

        iii.   identifies the PPI sought;

        iv.   is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and

        v.   states that de-identified information could not be used to accomplish the purpose of the disclosure.

- If it is believed in good faith that the PPI constitutes evidence of criminal conduct that occurred on the premises of DCA or the premises of a GA HMIS Participating Agency;
- In response to a written request as described above for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosed consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics; or
- If the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others); and if the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which it is sought.

h) To comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.

2. ***DCA and CoC Administrator Agencies*** may use or disclose personal information for activities set forth below and for activities DCA determines to be compatible with such activities. DCA assumes that you consent to the use or disclosure of your personal information for such purposes.

a) To carry out maintenance and operation of GA HMIS.

b) To create de-identified (anonymous) information that can be used for research and statistical purposes without identifying clients.

c) For academic research purposes, release of PPI will be allowed if research is:

- Conducted by an individual or institution that has or enters into a formal relationship with DCA and/ or with a CoC Administrator Agency, if the research is conducted by either:

        i.   an individual employed by or affiliated with the organization for use in a research project conducted under a written research agreement approved in writing by DCA and/ or the CoC Administrator Agency, (other than the individual conducting the research); or

      ii.   an institution for use in a research project conducted under a written research agreement approved in writing by DCA and/ or the CoC Administrator Agency; and

- The formal relationship is contained in a written research agreement that must:
  - i. establish rules and limitations for the processing and security of PPI in the course of the research;
  - ii. provide for the return or proper disposal of all PPI at the conclusion of the research;
  - iii. restrict additional use or disclosure of PPI, except where required by law;
  - iv. require that the recipient of data formally agree to comply with all terms and conditions of the agreement;
- The written research agreement is not a substitute for approval (if appropriate) of a research project by an Institutional Review Board, Privacy Board, or other applicable human subjects protection institution.

3. Before DCA, a CoC Administrator Agency, or the GA HMIS Participating Agencies make any use or disclosure of your personal information that is not described herein and above, we will seek your consent.

D. How to Inspect and Correct Personal Information

1. Clients may inspect and have a copy of their PPI that is maintained in GA HMIS, with the exception of case notes. DCA, a CoC Administrator Agency, and/or the GA HMIS Participating Agency, will respond to any such request made by a client within a reasonable time frame, usually 2-3 business days. GA HMIS Participating Agency staff will offer to explain any information in the file. For data that is maintained by DCA as the administrator of GA HMIS but was not entered by the DCA staff, DCA may require that the request for inspection be managed through the GA HMIS Participating Agency that entered the information.

2. DCA, a CoC Administrator Agency, and/or the GA HMIS Participating Agency will consider requests for correction of inaccurate or incomplete personal information from clients. If DCA, a CoC Administrator Agency, and/or the GA HMIS Participating Agency agrees that the information is inaccurate or incomplete, the personal information may be deleted or supplemented with additional information.

3. To inspect, get a copy of, or ask for correction of personal information, a client can contact any GA HMIS Participating Agency staff member at the GA HMIS Participating Agency at which he or she received services. The appropriate GA HMIS Participating Agency staff member will be located to assist with the review and/or correction of the file within a reasonable time period, usually 2-3 business days.

4. DCA, a CoC Administrator Agency, and/or a GA HMIS Participating Agency may deny a direct request for inspection or copying of personal information if:

- the information was compiled in reasonable anticipation of litigation or comparable proceedings;
- the information is about another individual;
- the information was obtained under a promise of confidentiality and if the disclosure would reveal the source of the information; or
- disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.

5. If a request for access or correction is denied, the organization that denies the request (DCA, the CoC Administrator Agency, and/or the GA HMIS Participating Agency) will explain the reason for the denial. DCA, the CoC Administrator Agency, and/or the GA HMIS Participating Agency will also include, as part of the personal information that is maintained, documentation of the request and the reason for the denial.

6. DCA, a CoC Administrator Agency, and/or a GA HMIS Participating Agency may reject repeated or harassing requests for access or correction.

E. Data Quality

1. The Collaborative collects only personal information that is relevant to the purposes for which it plans to use it or as required for reporting to our Funders. To the extent necessary for those purposes, The Collaborative seeks to maintain only personal information that is accurate, complete, and timely.

2. DCA may implement a plan to dispose of personal information not in current use seven years after the information was created or last changed. As an alternative to disposal, DCA may choose to remove identifiers from the information so that the data can be maintained for analysis purposes.

3. DCA may keep information for a longer period if it chooses or if it is required to do so by statute, regulation, contract, or other requirement.

F. Complaints and Accountability

1. DCA, on behalf of The Collaborative, accepts and considers questions or complaints about GA HMIS' privacy and security policies and practices. To file a complaint or question, a person should do the following:
    - If the complaint is about one of the GA HMIS Participating Agencies using GA HMIS, the client should first follow the questions and/or grievance procedure of that organization. If the grievance cannot be resolved at the GA HMIS Participating Agency level, the question/complaint should be addressed to DCA in writing or in person for resolution. DCA's main office is located at 60 Executive Park South, Atlanta, GA 30329. DCA's phone number for purposes of GA HMIS is (404) 679-4840;

- If the complaint is received by DCA, in writing or in person, about a GA HMIS Participating Agency or about an internal program, it will be reviewed by the staff responsible for administering GA HMIS first. If the question or complaint cannot be resolved at that level it will be brought to the attention of the GA HMIS Steering Committee and/or DCA's Office of General Counsel, whichever is most appropriate for the particular situation.

2. All members of DCA (including employees, volunteers, affiliates, contractors and associates), CoC Administrator Agencies and GA HMIS Participating Agencies are required to comply with this notice. Each individual with access to GA HMIS must receive and acknowledge receipt of a copy of this notice and pledge to comply with this notice in writing.

G. Privacy Policy Change History

Each copy of this notice will have a history of changes made to the document. This document's change history is as follows:

- Version 1 – 2005 - Initial Policy
- Version 2 – New policy Draft (Insert approval date here and remove drafts below)
  - October 19th, 2015 (Initial revised Draft)
  - December 14th, 2015 (2nd revised Draft)

Section A. Background and Structure

A.1   HMIS Background

A Homeless Management Information System (HMIS) is a software application designed to record and store client-level information on the characteristics and service needs of homeless persons. An HMIS is typically a web-based software application that homeless assistance providers use to coordinate care, manage their operations, share information and better serve their clients.

HMIS implementations can cover geographic areas ranging from a single county to an entire state. They are based primarily on the Continuum of Care geography. A HUD Continuum of Care is the primary decision making entity defined in the funding application to HUD as the official body representing a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency. An HMIS helps to link homeless assistance providers within a community and create a more coordinated and effective housing and service delivery system.

The U. S. Department of Housing and Urban Development (HUD) and other planners and policymakers at the federal, state and local levels use aggregate HMIS data to obtain better information about the extent and nature of homelessness over time. Specifically, an HMIS can be used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs.

The Georgia Homeless Management Information System was started in 2002. Currently the Georgia HMIS has over 400 active agencies and covers eight of the nine Georgia Continuum's of Care. Active agencies have entered over 1,643,233 individuals and families since 1999. The Georgia HMIS is a shared system, meaning agencies that are serving the same person can view information and coordinate services using HMIS.

A.2   HUD Requirements and HMIS Data Standards

The HMIS Data Standards (2014 HMIS Data Dictionary and HMIS Data Manual), released August, 2016 provides communities with baseline data collection requirements developed by each of these federal partners. The Manual is intended to serve as a reference and provide basic guidance on HMIS data elements for CoCs, HMIS Lead Agencies, HMIS System Administrators and users. This release of the 2014 HMIS Data Manual is Version 5.1 and is an update to the 2014 Data Standards Manual. The companion document to the HMIS Data Manual is the HMIS Data Dictionary which defines all of the data elements and requirements for HMIS compliance for HMIS Vendors and System Administrators.

The privacy and system security standards for providers remain the same as presented in the July 30, 2004 Final Notice.

Access the current HMIS Data Manual at:
https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf

  Access to the current HMIS Data Dictionary Manual at:
https://www.hudexchange.info/resources/documents/HMIS-Data-Dictionary.pdf

Access the Privacy and System Security Standards from the July 30, 2004 Final Notice at:
https://www.hudexchange.info/resource/1318/2004-hmis-data-and-technical-standards-final-notice/

A.3   Annual Homeless Assessment Report (AHAR)

The Annual Homeless Assessment Report (AHAR) is a report to the U.S. Congress on the extent and nature of homelessness in America. The report is prepared by the Department of Housing and Urban Development (HUD) and provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The report is based primarily on Homeless Management Information Systems (HMIS) data about persons who experience homelessness during a 12- month period.

The AHAR uses aggregate HMIS data from communities across the country to produce a national report on homelessness to the U.S. Congress. The AHAR is designed to:
 • Develop an estimate of the number of homeless persons nationwide;
 • Create a descriptive profile of homeless persons;
 • Understand service use patterns; and,
 • Estimate the nation's capacity to house homeless persons.

The AHAR is based on an unduplicated count of homeless persons within each community, and focuses on persons who use emergency or transitional shelters. Thus, the AHAR reports only on the number of sheltered homeless persons and does not account for homeless persons who: only use a supportive service program, are formerly homeless and living in permanent supportive housing; or are service resistant and do not access any type of homeless service program during the study period.

Eventually, all Continuum of Care will most likely submit AHAR data. Therefore, it is important that all programs, especially those that provide shelter or housing, enter data accurately and in a timely manner.

For more information on Annual Homeless Assessment Report, see http://www.hudhdx.info/

A.4   Georgia HMIS Organization, Management and Contacts

Project Goals

The goals of the GA HMIS Project are:
  1) Assist homeless persons to navigate the continuum of care
  2) Assist homeless service agencies with information allowing them to better serve their clients
  3) Assist homeless agencies, local, state and Federal entities with information on numbers of homeless persons, reasons for homelessness, services they require, services they receive, gaps in services, etc.

Project Organization

The Georgia HMIS is a collaborative statewide effort to implement HMIS across eight of the nine Georgia continuum's of care. Columbus-Muscogee has a separate HMIS implementation. The Lead Agency for the Georgia HMIS project is the Department of Community Affairs. The lead agency oversees the HMIS project and manages the Supportive Housing Program grant from HUD, however each Continuum of Care is responsible for ensuring that the implementation is successful in their Continuum. Many of the Continuum of Care also have HMIS staff that work specifically on HMIS issues in that Continuum.

HMIS System Development and Planning

Each CoC is responsible for soliciting feedback from agencies and stakeholders and communicating that feedback to the Steering Committee. Each CoC should establish an advisory group made up of agencies and other stakeholders in order to solicit feedback on HMIS implementation. The CoC representative should then bring this feedback to the Steering Committee.

The Steering Committee is made up of representatives from each of the eight continuum of care and the DCA project manager. The role of the steering committee is to oversee overall implementation and request enhancements to the ClientTrack system.

HMIS Implementation

Each CoC is responsible for ensuring that all agencies in that CoC are adhering to the State or Local CoC HMIS policies. The CoC lead should coordinate with DCA in order to develop a training and technical assistance plan that will allow them to troubleshoot any problems in implementation. Agencies can also request training and technical assistance from their CoC Representative.

If a user or agency has a request for a **system enhancement** they should communicate the request to their CoC lead that will pass it on to the project manager for review. This request will be reviewed by the GA HMIS Steering Committee.

ClientTrack System Errors

For issues related to system errors, agencies and the continuum of care representatives should communicate directly with ClientTrack. System errors can be reported through the system itself using the "Contact Support" link. You may also contact Support by email at GAHMISSupport@dca.ga.gov. ClientTrack will provide the steering committee and project management with regular updates on any system errors reported and the status of their repair.

Contacts

The HMIS Lead contact at the Department of Community Affairs is Jeanette Pollock at Jeanette.pollock@dca.ga.gov.

The CoC lead contact for HMIS issues are:

Athens – Ryan Halsey – Ryan.Halsey@athensclarkecounty.com
Atlanta – Cathryn Marchman –CFMarchman@AtlantaGa.Gov
Augusta – Daniel Evans - devans2@augustaga.gov
Balance of State – Tina Moore - tina.moore@dca.ga.gov
Cobb – Carolyn Bridges - CarolynBridges@thecfr.org
DeKalb – Melvia Richards - mwrichards@dekalbcountyga.gov
Fulton – Leonard Westmoreland - Leonard.Westmoreland@fultoncountyga.gov
Savannah – Janice Sheffield - janice@homelessauthority.org

If your agency is located in Columbus/Muscogee, you should contact the Continuum of Care Lead of Home for Good, Pat Frey, Executive Director at pat@unitedwayofthecv.org for information on the Columbus/Muscogee HMIS Implementation.

ROLES AND RESPONSIBILITIES

End User
- Obtain Client Consent
- Enter and Update Data
- Adhere to Privacy, Security and Confidentiality Policies
- Adhere to GA HMIS Standard Operating Procedures

Agency
- Attend Advisory/User Group Meetings
- Ensure Adherence to Relevant HMIS Policies
- Ensure Adherence to GA HMIS Privacy, Security and Confidentiality Policies

Continuum of Care HMIS Representative(s)
- Run Continuum User Group
- Attend Steering Committee
- Inform Agencies of Continuum Specific Policies
- Monitor HMIS Utilization by CoC Agencies
- Communicate Concerns and Enhancement Requests to Project Manager
- Communicate system issues to ClientTrack
- Troubleshoot Implementation and Training Needs
- Provide additional assistance to agencies as needed
- AHAR submission

Lead Agency Staff (DCA)
- Manage GA HMIS Grant
- Coordinate Steering Committee
- Obtain Feedback from Continuum Representatives
- Compile Continuum Requested Enhancements for Steering Committee
- Monitor Project Progress and Deliverables
- Monitor Adherence to HUD HMIS Data and Technical Standards and Guidelines
- Communicate National HMIS Best Practices to Steering Committee

System Admin Staff
- Develop Enhancements as Directed by Steering Committee
- Assist Continuums with Monitoring Data Quality and Completeness
- Monitor Agency and System Security
- Repair System Errors in a Timely Manner
- Ensure System is Operational and Accessible
- Provide Ongoing Reports to Project Manager and Steering Committee regarding: Data Quality; Training and Technical Assistance Provided; Enhancement Project Progress; Fixes; HMIS Utilization Rates; Security Audit Findings

A.5   State and Local HMIS Policies

DCA has developed a policy regarding utilization of HMIS for all DCA grantees and Balance of State Continuum of Care grantees. The policy can be found on the DCA website at: http://www.dca.ga.gov/housing/specialneeds/programs/documents/HMIS_Policy_7-07-09.pdf .   This policy may be updated periodically.

Each additional Continuum of Care may have a Continuum policy regarding HMIS implementation. Agencies should contact Continuum leadership regarding any Continuum specific requirements. If there are no specific Continuum Policy for their county and the agency is not a DCA grantee, the agency should follow general the Georgia HMIS Standard Operating Procedures on HMIS implementation found in this manual.

> Additional funders (e.g. United Way, Salvation Army, local governments) may have additional requirements regarding the use of the ClientTrack System. Agencies should consult each of their funders to ensure they are aware of all relevant requirements.

A.6   Domestic Violence Agencies

> According to the HUD Federal Register dated March 16, 2007 [FR-5056-N-01], agencies that are classified as Domestic Violence Agencies should not enter any identifying information into HMIS. Specifically, the register states:

"The new Confidentiality provision directs victim service providers not to disclose, for the purposes of HMIS, personally identifying information about any client. In accordance with this statutory requirement, victim service providers must maintain the confidentiality of personally identifying information of the providers' clients."

At this point in time, HUD has instructed Domestic Violence agencies not to use HMIS to enter any client level information, including non-identifying information.

Section B. Agency and User Procedures

B.1   New Agency Procedures

Step 1. Sign Agency Agreements

1. Complete and return the signed DCA Agency Agreement.
2. Ensure system and equipment requirements are met

    All agency forms should be completed and returned by mail to the Special Projects Manager at DCA, 60 Executive Park South NE, Atlanta, GA 30329; or email: Jeanette.pollock@dca.ga.gov; or fax: 770.302.9508. Keep a copy of all documents for your files.

Step 2. Ensure Agency Meets Technical Requirements

    Recommended Computer
    Specifications: Processor: 300 MHz
    Processor PC Operating System:
                    Windows 98 or above
    Memory: 128 MB RAM
    Browser: Internet Explorer or Google Chrome Internet
    Access: DSL or better

    Agencies must also be able to meet applicable security requirements. Detail on security requirements can be found in section D.2 of this manual.

Step 3. Designate ClientTrack Agency Administrator

Step 4. Designate who will be authorized system users and their access level

Section C. Data Entry and Data Quality

C.1   Client Consent to Share and Client Consent to Share Revocation
The client has the right to revoke their consent at any time for any reason. If the client wishes to revoke their consent, the GA HMIS Client Consent to Share Revocation form should be completed, signed and dated and inserted into the client file.

Client Intake:
This is the process in which a client or potential client will go through a process where information is gathered and entered into the ClientTrack system. Client Intake includes entering new client data or updating information for a client that is already in the ClientTrack system. Any client intake should start with a thorough client search to make sure the client is not already in ClientTrack. All efforts should be taken to ensure

duplicate records are not created within the ClientTrack system. Conducting a thorough client search at Intake will help reduce the number of duplicates within the system. For further instructions on how to conduct a client search to avoid duplicates, refer to the ClientTrack User Guide.

Each agency should enter and/or update the Universal Data Elements for all household members and Program Specific Data Elements (where required) at intake. Detailed information about these data elements can be found below. Ideally, an agency would input the information into ClientTrack during the intake, however when paper intake forms are necessary please use the Intake and Project Update forms that have been provided. These forms can also be accessed from the HMIS website:
http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp

> Care should be taken to make sure that all of a client's information is updated (such as housing status, marital status, household, etc.) at intake if they have an existing record in the system.

C.2   Required Data Elements

The HUD Data Standards outline three categories of required data elements. Two of these categories are at the client level and the third, Program Descriptor, is at the program level.

The Universal Data Elements section provides information on data elements required to be collected by all projects using an HMIS as part of a CoC implementation. This includes all projects funded by any of the HMIS federal partners and those projects that receive other funding, including those who receive no federal funding.

HUD Universal Data Elements:

The Universal Data Elements are to be collected from all clients served by all homeless assistance programs reporting to the HMIS. The Universal Data Elements section provides information on data elements required to be collected by all projects using an HMIS as part of a CoC Implementation. This includes all projects funded by any of the HMIS federal partners and those that receive other funding, including those who receive no federal funding. The Universal data elements are needed for Continuums of Care (CoC) to understand the basic dynamics of homelessness in their communities and for HUD to meet Congressional direction to: develop unduplicated counts of homeless services users at the local level; describe their characteristics; and identify their use of homeless assistance and mainstream resources.

The Universal data elements are: Name, Social Security Number, Date of Birth, Ethnicity, Race, Gender, Veteran Status, Disabling Condition, Residence Prior to Program Entry, Project Entry Date, Project Exit Date, Destination, Personal ID, Household ID, Relationship to Head of Household, Client Location, Length of Time on Street, in an Emergency Shelter, or Safe Haven.

The ClientTrack system automatically generates the unique person identification number, the project identification number and household identification number data elements.

HUD Program Specific Data Elements:

Program Specific Data Elements as defined in the final Notice, are data elements that are required for programs receiving certain types of funding, but are optional for other programs. Program specific data elements are necessary to complete the Annual Progress Reports (APR's) required by programs.

The program specific data elements that are required for HUD's current APR reporting include: Housing Status, Income and Sources, Non-Cash Benefits, Health Insurance, Physical Disability, Developmental Disability, Chronic Health condition, HIV/AIDS, Mental Health, Substance Abuse, Domestic Violence, Contact, Date of Engagement, Services Provided, Financial Assistance Provided, Referrals Provided, Move –In Date, Housing Assessment Disposition and Housing Assessment at Exit. Some of these elements may be required for certain programs and funding streams.

Program Descriptor Data Elements

These elements are required of all programs in a Continuum of Care and provide descriptive information about an agency and their programs. For more guidance on the HUD data standards: https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf

Continuum of Care Data Requirements

Each Continuum of Care may have additional data element requirements. You will need to consult with your CoC to verify what additional data elements may be required. Balance of State Continuum of Care Grantees should follow all DCA HMIS and HSS requirements.

Timelines for Data Entry

Each agency should follow the guidelines set forth by their respective Continua of Care relating to data entry timelines. However, whenever possible, it is best to input the data as soon as possible, in order to maintain the most current support being offered to a client.

DCA and Balance of State Continuum of Care Grantees, data should be entered within one week of intake/enrollment. Clients should be discharged from the HMIS program within one week of their discharge.

> When client information is entered, the dates entered for enrollment and discharge should be the ACTUAL dates that an individual entered or left the program, not the date of data entry/update.

C.3   Programs (Enrollment and Discharge)

Program entry and exit dates should be recorded upon any program entry or exit on all participants. Entry dates should record the first day of service or program entry with a new program entry date for each period/episode of service. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter or the last day a service was provided.

Program Enrollment:

The ClientTrack system includes a program enrollment workflow that allows the user to enroll a client in to one or more programs. The client remains in the program based upon the expected

length of stay as determined by the agency administrator. This requires programs to be configured prior to enrolling a client into a program.

Program Discharge:

In order for a client to be discharged from a program, the client must first be enrolled in a program. Once the client has completed or the time has expired for the client to be in the program, such as Emergency Shelter or Transitional Housing, the client should be discharged from the program. Failure to discharge the client on a timely basis will skew the data and will impact the accuracy of reporting, such as the HUD APR Entry Report and the HUD APR Exit Report.

C.4 Updating Data

Care should be taken to make sure that the clients information is updated (such as housing status, marital status, household, etc.) each time the client file is reviewed. At the very minimum, data should be updated at program enrollment, once a year for long term programs, and at program discharge. It is recommended that at every visit by a client, the universal data elements should be verified to ensure the latest information in the client record is complete. Suggested updates that should also occur with each client visit should include: Income, Services Rendered, Housing Status/Residence, Household composition. While there are more suggested data elements, updating information on a client should occur as often as reasonably possible.

C.5 Data Quality and Data Integrity

Reducing Duplicates:

All efforts should be taken to ensure duplicate records are not created within the ClientTrack system. Conducting a thorough client search at Intake will help reduce the number of duplicates within the system. For further instructions on how to conduct a client search to avoid duplicates, refer to the ClientTrack User Guide or click on the Conducting a client search tutorial. If you do create a duplicate, please contact ClientTrack Support regarding ways to eliminate the duplicate.

Improving data quality

- One of the most effective ways to collect quality data is to make sure your agency develops clear data collection and entry standards that are implemented by all staff members entering data into the ClientTrack HMIS system.
- There should be a shared understanding of purpose and process. Minimally, each staff member should have a document that outlines the data collection process and explains the importance of accurate data and maintaining data quality.
- Establish a Rapport with Consumers. Often people in a vulnerable position of being homeless may give incorrect information intentionally or unintentionally for a host of reasons. Inaccurate information can be minimized by establishing a rapport with the consumer.
- Paper forms should closely resemble the layout of the Intake screens within the ClientTrack system. Intake forms will be provided and can be found on the DCA website: http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp
- Proofread any hard copy of information that has been entered.

- Periodically review data quality at your agency. Emphasize and communicate any issues with data quality into already scheduled staff meetings.

Section D. Data Ownership, Security and Access

D.1   HMIS Privacy and Security Standards

HUD released HMIS Privacy and Security Standards in the Homeless Management Information System (HMIS) Data and Technical Standards Final Notice on July 30, 2004. The notice presents privacy and system security standards for providers, Continuums of Care and all other entities that use or process HMIS data.

Access the Privacy and System Security Standards from the July 30, 2004 Final Notice at: http://www.hmis.info/Resources/724/Data-Standards-Training-Module-1-Handout-HUD-Data- and-Technical-Standards.aspx

D.2   Agency Privacy and Security Procedures

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. Information on how to develop a privacy policy can be found at:
http://www.dca.ga.gov/housing/specialneeds/programs/downloads/HUDPrivacyPolicyRequirements.pdf

For information about how to implement the security procedures required by HUD, please contact your Continuum of Care Representative.

D.3   ClientTrack Privacy and Security Procedures

ClientTrack Privacy Policy
ClientTrack will not sell or rent personally identifiable information that we collect, and will not collect or share personally identifiable information from visitors or system users without first informing them that information will be collected, whether or not it could be shared, and with whom it might be shared. We will not share any individual's personally identifiable information without that individual's permission.

Log Files: We may use IP addresses to analyze trends, administer the site and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

Links: ClientTrack web sites contain links to other sites. Please be aware that ClientTrack is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site, and to read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by ClientTrack sites.

News Service: If a user wishes to subscribe to our news service, we require contact information such as name and email address.

Surveys: From time-to-time our site requests information from users via surveys. Participation in these surveys is completely voluntary and the user therefore has a choice whether or not to disclose this information. Information requested may include contact information (such as name and address), and demographic information (such as zip code, age level). Survey information will be used for purposes of monitoring or improving the use and satisfaction of the ClientTrack system.

ClientTrack Security Policy

ClientTrack takes every precaution to protect the information of people who use our services. When you submit sensitive information via the ClientTrack application website, your information is protected both online and off-line. When our case management system users are asked to enter sensitive information (such as a social security number) the information is encrypted. While on a secure page, the lock icon on the bottom of web browsers such as Mozilla Firefox and Microsoft Internet Explorer becomes locked, as opposed to un- locked, or open, when you are just 'surfing'. While we use SSL encryption to protect sensitive information online, we also do everything in our power to protect user- information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, a technical support representative) are granted access to personally identifiable information. Furthermore, ALL employees are kept up-to-date on our security and privacy practices. Every quarter, as well as any time new policies are added, our employees are notified and/or reminded about the importance we place on privacy, and what they can do to ensure our customers' information is protected. Finally, the servers that we store personally identifiable information on are kept in a secure environment, in a locked data center.

The use of this system constitutes an express consent to the monitoring of system use and security at all times. If such monitoring reveals possible violations of the law, pertinent information will be provided to law enforcement officials. Any persons using this system or information obtained from this application, without proper authorization or in violation of these policies and procedures may be subject to civil and/or criminal prosecution. Any persons enabling access by an unauthorized individual may also be subject to internal disciplinary actions in addition to civil and/or criminal prosecution.

These policies are applicable to all users (employees, contractors, and others) of agencies, partners and funders and the computer systems, networks, and any other electronic processing or communications and related resources used in conjunction with the ClientTrack HMIS system and/or data obtained through the HMIS system.

ClientTrack places highest priority on the security of its systems, and the private information they contain. ClientTrack, its staff and volunteers continually work to protect data and systems:

1. <u>Confidentiality</u>. Access to client information must be tightly controlled and people with access to confidential information must understand their personal responsibility to maintain its confidentiality.
2. <u>Integrity</u>. Client information must be protected so that it cannot be modified while in transit or storage. Reported data must be accurate.
3. <u>Availability</u>. Systems must be available to users when and where they need them.

If an employee leaves your agency, inform the CoC Administrator or System Administrator at DCA via email as soon as possible so that their account can be deactivated.

Information Security Procedures:

All ClientTrack employees and volunteers are responsible for protecting the confidentiality and security of ClientTrack systems and the human services client information   they contain. Information concerning the security related tasks an employee is responsible for   are included in the employee's job description. The agency is responsible for ensuring that information that is printed from the ClientTrack system is also kept confidential, private and secure.

HIPAA

Agencies that are covered by HIPAA include health care providers, health care plans, or healthcare clearinghouse should ensure that they are in compliance with all HIPAA regulations.

For more information about HIPAA visit the following website:
http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/index.html

D.4   Access to Data

Data Sharing across Providers

The ClientTrack HMIS gives individual clients complete control over which agencies can view their information. At point of service the client may authorize an agency to share existing information in the HMIS.

"Protected" Information

Protected Agency: Certain agencies that deal substantially with HIV/AIDS, domestic violence, substance abuse, mental illness, or legal services are designated as Protected Class agencies. If your agency is a Protected Class agency, all Client Services Information records (including referrals) are hidden, or protected, from view by any other agency.

Access to Data for Monitoring

Department of Community Affairs, as the lead HMIS agency, and your Continuum of Care representative will have access to your agency's data for monitoring purposes and aggregate   reporting purposes. Other funders may have access to your data for monitoring purposes based on their funding agreement with your agency.

Unauthorized Access to the ClientTrack system:

Any user accessing the ClientTrack system must be affiliated with an active member agency. Additionally, each system user must attend the required Training in order to be given a User Id and Password. Unauthorized access is prohibited and are grounds for legal action.

D.5   Client Grievances

Grievance Procedure:

1. A client has the right to appeal his or her individual complaints related to their HMIS data to the entering agency in accordance with the agency's established grievance policy.
2. Complaints about the conduct or practice of HMIS may be filed in writing to the Project Manager at the Department of Community Affairs.
3. Agencies are responsible for establishing an internal grievance process to handle client complaints and grievances related to consent and release of information related to the HMIS system.

If a client has a grievance regarding erroneous data entry or inappropriate use of their data, they will need to follow the agency's established guidelines, standard operating procedures or protocol on resolving these issues.

Revoking Consent:

The client has the right to revoke their Consent at any time for any reason. If the client wishes to revoke the client consent, the GA HMIS Client Consent to Share Revocation form should be completed, signed and dated and inserted into the client file.

Section E. Reporting

E.1   Introduction to ClientTrack Reporting

The reporting module provides quick intuitive on demand reporting, analysis and data export for sharing the information stored in your HMIS.

Reports were designed to help you

- Make better decisions that support the success of your organization
- Know and understand your clients (What is working)
- Tap into and analyze data
- Help manage your organization and resources
- Produce accurate and up to date counts
- Monitor Agency Performance

The reports can provide users a variety of options for printing and sharing their HMIS information. An abundance of standard reports and data exports can be accessed by any user that has access rights.

Your System Administrator controls access to different reports for each user. You should contact them if you would like access to the reports available in ClientTrack.

All reports depend on the quality of information captured during data entry. Complete and accurate data is crucial for accurate reporting. Accurate reports, in turn help with funding, grant writing, staffing, tracking services and forecasting.

Section F. System Support, Training and Technical Assistance

F.1   Training

The System Administrator will maintain a training calendar. All ClientTrack training, locations, dates and times are listed on http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp Each user can register for the training most conducive to their learning style.

F.2   Technical Assistance

Technical Assistance Process:
The System Admin will work with the CoC Administrator to help them achieve HMIS compliance on the ClientTrack system. The proper personnel should be in attendance to make sure each user within the agency follows the same protocols and procedures needed to ensure good data quality.

F.3   Reporting System Issues

ClientTrack provides several ways in which to report system outage, problems, or questions. Users can communicate with the Support Team by clicking on the Help link while in the ClientTrack application or via email: GAHMISSupport@dca.ga.gov.

F.4   Requesting Enhancements

An enhancement to the system includes an additional data element, report, or function that was not previously in the system. Enhancements do not include fixing an existing function of the system. System errors should be communicated directly to the System Admin. If ClientTrack Support determines the request is an enhancement rather than a System Error, they will communicate this to the requestor who should then follow enhancement request protocol.

If an agency would like to request an enhancement to the system, they should communicate this request to the HMIS representative for their Continuum of Care directly or through the advisory/user group. Continuum of Care HMIS contacts can be found on page 6 of this manual.

Once the continuum of care HMIS representative has determined that the request is a priority for the continuum, they will communicate this request to the System Admin. The System Admin will then compile all requested enhancements for discussion at the next steering committee meeting.

Section G. Monitoring

G.1   Data Monitoring

Each continuum of care or funder may have individual monitoring procedures. For specific information on monitoring, agencies should contact their funder or Continuum of Care representative.

If your agency receives DCA funding, agency utilization of the system is monitored on a quarterly basis in addition to being monitored during on-site visits. For more information about DCA monitoring, contact Tina Moore at tina.moore@dca.ga.gov.

G.2   Privacy and Security Monitoring

Security Audits will be conducted periodically by the System Admin Staff in pursuant to the baseline standards defined in the HUD 2004 Data and Technical Standards. https://www.hudexchange.info/resource/1318/2004-hmis-data-and-technical-standards-final-notice/

These Security Audits will focus on the following areas:

Physical access to Systems with access to HMIS

Data Disaster Protection and Recovery
Disposal
System Monitoring User
Authentication
Electronic Data Submission
Electronic Data Storage Security
Privacy Standards

DCA and other funders may also monitor during on-site visits to ensure that the agency is following the key privacy and security standards.

ADDITIONAL RESOURCES

ClientTrack Documents, Forms and Tutorials –

http://www.ClientTracktraining.org/

DCA HMIS Website –
http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp

HUD Homelessness Resource Exchange –
http://www.hudhdx.info/