



**MONTGOMERY COUNTY, MARYLAND (MCMD)
CONTINUUM OF CARE (CoC)
DEPARTMENT OF HEALTH AND HUMAN SERVICES
HOMELESSNESS MANAGEMENT INFORMATION SYSTEM (HMIS)
POLICY AND PROCEDURE MANUAL**

Montgomery County, Maryland Continuum of Care Policy and Procedure Manual lists local procedures for operating the HMIS. It documents specific expectations regarding the use of the system and procedures that should be followed regarding routine and occasional functions. This Manual is a living document that will be continually updated as appropriate by the HMIS Sub-Committee, under the Interagency Council on Homelessness, the governing body of the CoC. This Council fulfills the HUD CoC Lead role and all responsibilities therein.

The Interagency Council on Homelessness will Recruit individuals with lived experience to participate in the efforts of the ICH and provide recommendations to ICH members and CoC stakeholders on how people with lived experience should be involved in all aspects of the homeless system operations and the CoC Governance structure and process, this includes the governance related to the HMIS and Coordinated Entry System. Information regarding the structure and Committees/Subcommittees can be found in the ICH Governance Charter. The HMIS Sub-committee is the taskforce of the ICH Outcomes and Improvements Committee dedicated to the support, administration and governance of the HMIS. The sub-committee is comprised of HMIS Lead staff members and Cover Homeless Organization staff representing all functions of the software.

SECTION 1: Federal Operating Procedures

MCMD CoC adheres first and foremost to policies and procedures outlined in the Department of Housing and Urban Development HMIS Data and Technical Standards Final Notice [Docket No. FR 4848-N-02] (Appendix A, <https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>, <https://files.hudexchange.info/resources/documents/HPRP-Year-3-APR-Analysis.pdf>)

SECTION 2: Contractual Requirements and Roles

MCMD CoC Contract Requirements: Department of Health and Human Services (DHHS), in its role as the HMIS Lead Agency, agrees to provide all of the necessary equipment and staff to operate and maintain the centralized HMIS database site. This includes all required licenses for software and direct technical assistance to sites, with regards to the HMIS application. This applies to all Agencies that DHHS is currently funded to serve.

Effective June 14, 2012, please note Advance Reporting Tool (ART) licenses will be assigned to an Agency based on a 4:1 ratio. That is for every 4 programs at an Agency, 1 ART license is assigned. This policy will not be retroactive but will be grandfathered in. Unless an exception is granted, all Agencies will have 2 Agency Administrators in order to ensure continuity of operations and as such will be issued at a minimum 2 ART licenses.

Effective December 12, 2013, please note each Agency must have a minimum of two Agency Administrators designated. This policy is retroactive and will not be grandfathered in. The only two exceptions are (1) an Agency that has 1 worker and (2) an Agency that has only read-only access to the application. All other exceptions to this policy must be granted by the Homeless Administrator.

MCMD CoC New Sites Requirements: Any Agency that MCMD CoC does not receive alternate funding for but does want to participate must assume the costs of requisite licenses and cost share of central resources.

HMIS Project Team: MCMD CoC utilizes the HMIS Project Team to provide general oversight and guidance to the project. This includes policy administrators, contract monitors, and IT staff that provide service to the homeless population.

MCDHHS Information Systems and Technology (IS&T) Server Management: Management of an HMIS requires several divergent skill sets. The MCMD CoC project has identified the following roles to provide the best, most efficient service to our stakeholders:

- Project Manager
- Requirement Analyst
- Technical Support Specialist
- Trainer
- Application Administrator
- Developer

The project also designates the roles of every participating user in order to prevent any confusion around responsibilities and privileges. Each role must be filled in order for the Agency to begin working with the project: Participating Agency Executive Director, Participating Agency Site Technical Administrator, and User.

SECTION 3: Participation Requirements

All Covered Homeless Organizations (CHOs) are subject to the following requirements. A full list of CHOs is available on our website (montgomerycountymd.gov/homelessness) and in the Client Authorization in the appendices. Likewise a detailed outline of roles and responsibilities is included in the Participation Agreement in the appendices.

Participation Requirements: For most efficient utilization of the services provided by MCMD CoC, several steps must be completed at the Agency level before implementation can begin. IS&T staff assists with most steps though some require the Agency to act without assistance.

Steps include:

- High Speed Internet Connectivity (DSL or Broadband);
- Identification of a Site Technical Administrator to serve as primary contact;
- Signed Participation Agreement contract (Appendix F); and
- Establishing client consent procedures and interview protocols.

Central Server Requirements: This section covers the exact equipment, staffing, and procedures that the MCMD CoC IS&T staff is responsible for. Focused on security, the areas are:

- Hardware Physical Security
- Software Security
- Network security
- Client database security

Implementation Requirements: Agencies must generate documents that cover each of the following areas.

- Participation Agreement: Each participating Agency must agree to the requirements set forth in the Participation Agreement, which must be signed by a duly authorized Agency representative and returned to the Agency's DHHS Contract Monitor. Each Agency must complete the Provider Form (Appendix G)
- Interagency Data Sharing: HMIS users whose role-based access is a Case Manager I or II, Agency Administrator, or Executive Director will be able to view information on clients throughout the HMIS database.
- Notice of Privacy Practice: Each participating Agency must use a Notice of Privacy Practice (NOPP). DHHS will provide the Department's NOPP to each participating Agency for each Agency to adapt to their needs. Each participating Agency must provide a copy of the adapted NOPP to DHHS. If the participating Agency is a HIPAA covered entity, the Agency may continue to utilize its' own NOPP; however, MCDHHS must have copy of on file.
- Notice of Privacy Practice Posting: Each participating Agency must post the Notice of Privacy Posting in a conspicuous place at each Provider site. DHHS will provide the Privacy Posting, which is a summary of the NOPP.
- Release of Information: Each participating Agency must have signed Releases of Information (ROI) from each client upon program admission, to allow the sharing of information among authorized HMIS users. DHHS will provide the Release of Information (ROI) to each participating Agency. The DHHS

ROI does not replace an Agency's ROI, which is used to obtain and to share information from other Providers that are not part of the HMIS such as treatment providers, etc.

- Participant Privacy, restricted information including psychotherapy or treatment notes, details regarding domestic violence, dating violence, sexual assault and stalking concerns shall not be specifically entered into HMIS. Agencies can share information with providers only with a specific client *Release of Information*, not through the HMIS.
- Data Collection Commitment: Participation in the MCMD CoC project requires that all participating Providers collect the required universal and program specific data elements on all consenting clients. Each Agency must complete the HMIS Data Entry Form (Appendix O), which includes the minimal data elements. The Agency may add any additional elements it wishes to collect.
- Information Security Protocols: Internal policies must be developed at each site to establish a process for the violation of any of Montgomery County Government information security protocols.

- **Implementation Connectivity:** Once implementation has begun each site agrees to maintain connectivity in order to continue project participation.
- **Maintenance of Onsite Computer Equipment:** Each Agency agrees to maintain its computer equipment in order to continue project participation. DHHS IS&T agrees to maintain computer equipment provided to selected agencies involved in past HMIS pilots. Please note once the contract is terminated, the Agency must return the computer equipment to DHHS IS&T.
- **Conversion of Legacy Data:** Agencies that are using legacy systems that request data conversion must provide resources and processes to enable conversion unless specific contracts have been established to provide the conversion at no cost.
- **Policy Update Schedule:** DHHS will provide the HMIS Policy and Procedures Manual to each participating Agency. This manual will be reviewed annually and updated as necessary.

SECTION 4: Training

HMIS Application Training: MCMD CoC provides ongoing training on all relevant aspects of system operation for the duration of the project. Training modules are developed based on skill level and type of access to the system. Each user of the system is required to complete the application training, as well as HIPAA training, in order to begin using the system.

HIPAA Training: Each participating Agency is responsible for administering the HIPAA training and certifying that their users are trained. A HIPAA training verification will be required for all new users at the time they attend the HMIS Application training.

Scheduled Training Delivery: MCMD CoC agrees to deliver at least one monthly group trainings on an ongoing basis.

HMIS Onsite Application Training: MCMD CoC is available to deliver on-site training in the event that an Agency has a large number of staff to train. However, MCMD CoC will not deliver one to one training on-site.

HMIS and HIPAA Training Materials: All training documentation will be available on the County's HMIS Internet site, which is <http://www.montgomerycountymd.gov/hmis>.

SECTION 5: User, Location, Physical and Data Access

Access Privileges to System Software: Access to system resources will only be granted to Agency staffs that need access in order to perform their job. Users must complete the HMIS User Agreement form (Appendix H), in order to request access privileges.

Access Levels for System Users: Each user of the system will be assigned an account that grants access to specific system resources that they require. A model of least-privilege is used; no user will be granted more than the least amount of privilege needed to perform their job.

System Access Deactivation: Participating Agency Executive Director will complete the HMIS User Deactivation form (Appendix I) within one business day when there is a change in a user's job role or the user is no longer employed by the Agency.

Location Access Privileges to System Server: MCMD CoC may require that each computer accessing the system be identified and authorized prior to access. MCMD CoC uses electronic certificates in order to accomplish this goal.

Access to Data: All data collected by the MCMD CoC project is categorized. Access to datasets, types of data, and all MCMD CoC data releases is governed by policies developed by the HMIS Project Team.

Access to Client Paper Records: All users of the system must not have greater access to client information through the system than is accessible in the agencies paper files.

Physical Access Control: All equipment or media containing MCMD CoC data must be physically controlled at the Agency site. Protections and destruction policies vary depending on the type of data and media.

Logical Access: Access to system resources must be limited to authorized users for authorized transactions. **Unique User ID and Password:** Each user of the system must be individually and uniquely identified. Identification will be verified through a password.

Right to Deny User and Participating Agencies' Access: MCMD CoC retains the right to suspend or revoke the access of any Agency or individual to the system for consistent or egregious violation of MCMD CoC policies.

Data Access Control: Access to the system must be audited. All audits may be reviewed regularly.

Auditing - Monitoring, Violations and Exceptions: MCMD CoC considers any exception to stated DTS Rules of Behaviour (Appendix E) policies a violation of those policies that must be investigated.

Auditing – Data Logs: MCMD CoC will maintain logs of all actions taken by users. Logs may include operating system logs, database, and firewall logs. All logs may be reviewed regularly.

Data Assessment and Access: All data associated with the MCMD CoC project is categorized. Access to data is restricted based on the content of the data. Reproduction, distribution, and destruction of data are based on the content of the data.

Data Integrity Controls: Access to the production data is restricted to authorized users only. Each user that has access to production data is contracted to not falsely alter or impact data in any way. If the Agency receives information that necessitates a client's information be entirely removed from the HMIS, the Agency will complete the Client Delete Request form (Appendix L).

Local Data Storage: If agencies choose to store local copies of data they are required to developed policies and procedures on how data is generated, stored, and destroyed.

Transmission of Client Level Data: All authorized users agree to transmit any client level data

securely.

Data Accuracy: There are many aspects to data quality, such as validity, completeness, consistency, coverage, accuracy, and timeliness. Each of these aspects is defined in detail in the HMIS Data Quality Plan (Appendix N).

SECTION 6: Technical Support and System Availability

Planned Technical Support: MCMD CoC offers technical support to all participating agencies. Support services include training, implementation support, report writing support, and process troubleshooting.

Participating Agency Technical Service Request: Service requests from participating agencies may originate from any authorized user either by contacting the HMIS Administrator or sending a request to the HMIS email account (hmis@montgomerycountymd.gov).

Rapid Response Technical Support: Requests for service that require a rapid response will be responded to within 1 business day.

Availability – Hours of System Operation: The system is available to users 24 hours a day, except during routine system maintenance, scheduled system upgrades, and unexpected system failures.

Availability – MCDHHS IS&T Staff Availability: IS&T staff are available from 8:30 AM to 5:00 PM on Monday to Friday (with the exclusion of holidays) to respond to service requests.

Availability – Planned Interruption to Service: Participating agencies will be notified of planned interruptions to service one week prior to the interruption.

Availability –Unplanned Interruption to Service: In the event of an unplanned interruption to service IS&T staff will immediately notify all authorized users within one hour of the system failure.

Per Federal Guidelines the HMIS is not available to Victim Services Providers (VSPs). MCMD VSPs are operated by an organization who is contracted to maintain a comparable database.

SECTION 7: Stages of Implementation

Implementation – Stage 1: Start-up and Initial Training: Implementation begins with stage 1. To enter stage 1 an Agency must complete all requisite paperwork and have user accounts created on the system.

Implementation – Stage 2: Data Entry Begins: To enter stage 2 an Agency must begin entering data on their client population.

SECTION 8: Stages of Completion

One week prior to an Agency and/or Provider contract termination, the DHHS Contract Monitor will notify the Agency and/or Provider to exit all clients from the HMIS application. Upon the first business day of the contract termination, the HMIS Administrator will deactivate all user accounts associated with the Agency and/or Provider.

SECTION 9: Encryption Management

Encryption General: All potentially identifying information is encrypted in the database.

Encryption prevents unauthorized personnel from accessing confidential information for any reason.

Encryption Management: In the event that system wide data decryption becomes necessary the process is outlined here. Only one event has been identified that would require this, a change in products.

SECTION 10: Data Release Protocols

Data Release Authorization and Distribution: MCMD CoC does release data in the process of generating reports. MCMD CoC will only release de-identified aggregate data.

Right to Deny Access to Client Identified Information: MCMD CoC does not release client identified information to any third party. Court orders for information will be forwarded to the DHHS Housing Stabilization Senior Administrator for review. Pursuant to policy no release will occur unless the party obtains the written release of every client within the database prior to receiving the database.

Right to Deny Access to Aggregate Information: MCMD CoC retains the right to deny access to aggregate level data. Pursuant to policy any interested party must submit a request for data to the HMIS Project Team. All requests are reviewed by the HMIS Project Team.

SECTION 11: HMIS Grievance Policy

Participant Right to File a Grievance/Complaint: All Participants have a right to file a Grievance and/or Complaint if they believe their data has been mishandled. Agencies must make this right known to Participants and, upon hearing a complaint, share with them the Grievance Policy/Filing Doc.

Participants Right to Have Assistance in Filing a Grievance: Not only must the Participant be made aware of the Grievance Policy but, if requested, the Agency must assist the Participant in filing the Grievance in any reasonable way including but not limited to, acquiring translation and/or explanation of the Policy, allowing the Participant to dictate and affirm a Grievance, and allowing the Participant access to any reasonable accommodation related to filing the Grievance.

A Right to Services during the Grievance Process: The filing of a Grievance shall in no way interrupt the provision of service and there shall be no retaliation against, or punishment for, Participants participating in the Grievance process. Being in the Grievance process, however, does not entitle the Participant to any special treatment and all Program rules should remain in place and be followed by all parties.

Participants Right to Appeal the Recommended Resolution: If upon receipt of the Agency's recommended resolution, the Participant does not feel the Grievance was resolved to their satisfaction, the Participant may file their Grievance with the ICH through the HMIS Sub-committee.

Reporting Grievances to the ICH: Agencies must notify the HMIS Sub-committee of all Grievances, regardless of the Participant's response to the recommended resolution. The Sub-committee will report Grievances and the outcomes to the OIC on a quarterly basis.

Version: 2.0

Revision Date: September 2020

APPENDICES

Governance Documents

- A. Department of Housing and Urban Development HMIS Data and Technical Standards Final Notice [Linked on Page 1]
- B. MC CoC Governance Charter
- C. HMIS Governance Charter
- D. Coordinated Entry System Policy and Procedures

Participation Documents

- E. MC Department of Technology Services *Rules of Behaviour*
- F. Provider Form
- G. Participation Agreement
- H. HMIS User Agreement
- I. HMIS User Deactivation Form

Client Documents

- J. HMIS Client Authorization Form
- K. HMIS Privacy Notice
- L. Client Request Delete Form
- M. HMIS Grievance Policy

Data Management Documents

- N. HMIS Data Quality Plan
- O. HMIS Data Entry Form
- P. HMIS Data Entry/Workflow Manual(s)

¹ , <https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>,
<https://files.hudexchange.info/resources/documents/HPRP-Year-3-APR-Analysis.pdf>