

HMIS Participation Agreement

INTRODUCTION

Each Continuum of Care (CoC) is required to maintain a Homeless Management Information System (HMIS). San Francisco's instance of HMIS is the Online Navigation and Entry (ONE) System. The implementation of this system has improved how services for people experiencing homelessness are provided, serves as the main repository for client information, and functions as the primary communication tool for service providers.

San Francisco transitioned multiple legacy databases to the ONE System to improve the client intake process, how clients connect to services, and assist clients in maintaining housing. The following outlines the roles and responsibilities of all parties involved in the development, management, and utilization of the ONE System.

II. DEFINITIONS

Agency Lead (AL): an individual employee within each Partner Agency who acts as a representative of the Partner Agency for all communication related to the ONE System. ALs are expected to be the point person and to partner with the HMIS Lead Agency to field feedback while reliably and accurately responding to all requests. ALs manage the Partner Agency's staff requests, provide troubleshooting and technical assistance, and oversee data quality for their colleagues.

Continuum of Care ("CoC"): the collection of entities that comprise the entirety of homeless services in a given community. The necessity and scope of CoCs was established by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. All parties involved in the management of homeless services in a given community are part of the CoC. This includes all local community-based organizations and governmental bodies. San Francisco's Department of Homelessness and Supportive Housing (HSH) is the lead agency and the Local Homeless Coordinating Board (LHCB) acts as the governing body for the local CoC.

End User: every employee within a Partner Agency that is not designated as the Agency Lead is an End User. Depending on the scope of services provided by the Partner Agency, End Users will have different levels of access within the ONE System. End Users have a reciprocal relationship with the Agency Lead; End Users receive instruction from the Agency Lead on data entry and system use and, in turn, provide feedback and suggestions to the Agency Lead on system improvement and user functionalities.

HMIS Lead Agency: The CoC designates HSH as the HMIS Lead Agency. While Bitfocus, Inc. maintains the backend of the ONE System, the HMIS Lead Agency maintains the frontend of the system. This includes establishing best practices, providing oversight of instructional materials and system training, and





monitoring data quality. CoC funds for the HMIS component will exclusively be used by the HMIS Lead Agency only. Further, HSH monitors the efficacy of the system as a whole and dictates modification to Bitfocus, Inc.

HMIS System Administrator: Bitfocus, Inc. is the HMIS System Administrator and provides backend services and system development of the ONE System based on the needs of the Agency Leads as directed by the CoC. They are the primary manager of HMIS data system and built the existing instance of the ONE System. Bitfocus, Inc. will continue to alter the system per the needs of the community via HSH.

Oversight Committee: The Local Homelessness Coordinating Board (LHCB) serves as the Oversight Committee, also known as the CoC Board, for the CoC by reviewing and monitoring all policies and procedures surrounding issues related to homelessness. Additionally, the LHCB provides a forum for the community to participate in discussions around local policy.

Partner Agency: any entity involved in the CoC who utilizes the ONE System, including service providers across all spectrums and scopes. Each Partner Agency has a reciprocal relationship with the HMIS Lead Agency to receive instruction in usage of the ONE System and provide feedback. Most Partner Agencies have their own agency identification in the ONE System allowing them to maintain a comprehensive record of all clients served and services provided. For a full list of partner agencies, visit the ONE System support website here.

III. APPOINTMENT OF AGENCY LEAD

The role of Agency Lead is integral to the continued success of the CoC. Agency Leads liaise between the Partner Agencies, HMIS System Administrator, and Lead Agency. It is the responsibility of the Partner Agency to select an internal candidate to act as Agency Lead to provide (1) privacy and data sharing oversight, (2) technical assistance, and (3) effective communication between End Users and external organizations.

Partner Agencies are expected to conduct background checks on any employee being considered to serve as an Agency Lead. Additionally, this individual must understand the regulations regarding protected health information as contained in the Health Insurance Portability and Accountability Act (HIPAA). These stipulations are more than just a requirement of the CoC; it is to ensure End Users within Partner Agencies have adequate support and to ensure client level information is never compromised.

As the HMIS Lead Agency, HSH will work closely alongside all Agency Leads to ensure adequate data quality within the ONE System. Data quality reports and communications are forwarded to Agency Leads to ensure accurate and timely data management. Further, it is the Agency Lead's duty to ensure the Partner Agency they represent maintains compliance with this Participation Agreement and all other documents, agreements, and policies surrounding the administration of the ONE System.





IV. RESPONSIBILITIES

Agency Lead

- 1. Coordinate needs and training of End Users within Partner Agency
 - a. Provide HMIS Lead Agency with an updated list of End Users each month
 - i. Update System Administrator of all employee separations or role changes within 24 hours.
 - ii. Ensure new End Users are granted access to the HMIS by providing user access roles to HMIS System Administrator
 - b. Ensure new End Users have access to and have reviewed the CoC's most recent training materials
 - c. Identify needs for additional training materials or sessions the CoC should develop
 - i. Serve as the on-site HMIS resource to all End Users
 - Field staff suggestions for potential database improvement / enhancements and communicate suggestions to the HMIS Lead Agency and/or System Administrator
- 2. Attend regularly scheduled Agency Lead meetings

Oversight Committee

- 1. Ensure continued funding of its constituents' programs and Partner Agencies
 - a. Maintain records of meeting agenda and decision-making process
 - b. Act as coordinating body for Partner Agencies and any other entity that participates in homeless services that may touch the HMIS System
- 2. Act as arbiter of the philosophy and approach of the CoC
 - a. Guide the CoC in approaching the community and people on whose behalf they work to do so in accordance with the established philosophy
 - Oversee the implementation of all projects within the CoC to ensure they are in accordance with the philosophy that has been established by the Oversight Committee (LHCB)
- 3. Oversee and advise Lead Agency in the fulfillment of their duty to Partner Agencies and the community served, including ensuring consistent participation of recipients and Subrecipients of applicable HUD grants in HMIS
 - a. Advise on the usage and selection of HMIS System
 - b. Advise, alter, and ultimately approve policies and training materials that protect the privacy of clients, End Users, and Partner Agencies using the HMIS System by reviewing, revising, and approving a privacy plan, security plan, and data quality plan for the HMIS
 - Advise, alter, and approve the outcome and data standards to which Lead and Partner Agencies will be held





4. In consultation with the collaborative applicant and the HMIS Lead, develop, follow, and update annually the governance charter, which will include all procedures and policies needed to comply with Section 578.7 of the McKinney-Vento Act

End User

- 1. Adhere to all standards outlined in CoC guiding policies and documents¹
- 2. Utilize the HMIS based on job role and function
- 3. Assume personal responsibility to comply with all privacy policies and procedures and employ best practices surrounding privacy and confidentiality
 - a. Complete HSH Privacy Training in initial ONE System credentialing and annually thereafter²
 - b. Do not share personal login credentials with any person under any circumstances
 - c. Only discuss and share the minimal amount of data extracted from HMIS System when necessary for job roles and responsibilities
 - d. Report to the Agency Lead any instance privacy concerns, unauthorized or improper access to the HMIS System, or suspicious activity noted.
 - e. Ensure all new clients are given the HSH Notice of Privacy Practice and accompanying Homelessness Response System Release of Information
- 4. Comply with all standards and practices related to data entry and quality

HMIS System Administrator

- 1. Support CoC and Lead Agency
 - a. Provide phone and e-mail support to authorized representatives
 - b. Support CoC in implementing and utilizing existing system features and capacities
 - c. Connect End Users with Agency Leads or Lead Agency when appropriate
 - d. Monitor and maintain the HMIS System
 - e. Provide continuous service 24 hours a day, 7 days a week
- 2. Provide access to users at all levels
 - a. Verify and account for user access roles monthly
- Permit CoC to access Application Program Interfaces (APIs) when commercially available to develop and modify, as necessary, macros and user interfaces for use with any existing or future CoC systems and infrastructure

HMIS Lead Agency

- 1. Provide guidance and oversight to Partner Agencies surrounding required reporting, including:
 - a. Annual Performance Report (APR) collection from Partner Agencies
 - b. Biennial Point-In-Time (PIT) Count process as it relates to HMIS

² All training materials are posted on the ONE SF Help Center website: https://onesf.clarityhs.help



¹ For a full list of HMIS Documents please visit the HSH website at http://hsh.sfgov.org/overview/one-system/



- c. Annual Homeless Assessment Report (AHAR) as it relates to HMIS
- 2. Create, update as necessary, and distribute policy documents that are compliant with HUD standards, including:
 - a. Policy and procedure documents related to the HMIS System
 - b. Participation Agreements detailing roles and responsibilities of all parties, and acquire signed copies from each Partner Agency
 - c. Data quality plan
 - d. Privacy plan
 - e. Disaster recovery plan
- 3. Establish data quality standards in compliance with local and Federal Standards
 - a. Create protocols that ensure all parties are maintaining excellent data quality which includes ensuring the collection of both universal and program-specific data elements for each individual or family experiencing homelessness who seeks assistance; the ability to produce a summary of unduplicated client records; and the collection of program entry and exit dates
- 4. Support Partner Agencies, their Agency Leads, and the End Users whom they represent
 - a. Provide technical assistance and support to Partner Agencies and their employees
 - b. Verify data produced by Partner Agency reporting is consistent with stipulations in their contracts with CoC and HMIS Lead Agency data
 - c. Respond to the needs and requests of End Users as conveyed by their Agency Leads
 - d. Create training materials that Partner Agencies can distribute to End Users
- 5. Maintain supportive infrastructure and oversight of the HMIS System
 - a. Prepare and disseminate mandatory reports to governing bodies
 - b. Support Partner Agencies in maintaining high quality data standards
- 6. Oversee compliance and usage of CoC created policy documents
 - a. Advise and act as consultant for all parties on appropriate HMIS System usage
 - b. Receive, report, and act on feedback from all parties regarding policies surrounding the HMIS System
 - c. Ensure the operation of the HMIS System is HIPAA compliant
- 7. Serve as Primary Liaison with System Administrator
- 8. Provide, at the CoC's request, all necessary data and support required to support the HMIS Lead Agency's application for CoC funding and for designation as a High Performing Community

Partner Agency

- 1. Coordinate and support all End Users within the Partner Agency
- 2. Handle client data in accordance with privacy statutes and client requests
 - a. Adhere to HIPAA requirements in handling of client data within the HMIS System
 - b. Ensure the HMIS will not personally identify clients subject to the Violence Against Women Act (VAWA) including persons whose housing is impacted by the threat of domestic violence or are participating in programs that support victims of domestic violence





- c. Ensure confidential client information stored in the HMIS System and any hardcopy print outs is not shared without authorization
 - i. Ensure that all clients whose information is stored in the ONE System have received a copy of the HSH Notice of Privacy Practice
 - **ii.** Ensure these clients acknowledge the Notice and consent to their information being stored and accessed in the ONE System by signing a Release of Information, which must be uploaded to their ONE System profile.

3. Data Entry and Usage

- a. Submit high quality, accurate data to the HMIS according to the following timeframes:
 - i. Transitional and Permanent Housing Programs: Enter all program entry/exit data within three (3) work days.
 - ii. Emergency Shelters and non-HUD programs: Enter check in/check out within one (1) work day.
 - iii. Outreach and Coordinated Entry: Create client profile, if necessary, within three(3) work days. Record outreach services within one (1) work day.
 - iv. Whenever possible, consider entering data as it is being collected during client interactions so that clients may help identify potential inaccuracies.
 - v. Review data quality using APRs at least once a month.

V. KEY REFERENCE DOCUMENTS

Up-to-date information on key policies and best practices related to HMIS and HUD requirements are available on <u>HUD Exchange</u>. Information on San Francisco's CoC, the ONE System, and local policies and procedures are available on <u>HSH's website</u>. There are additional helpful resources linked below.

HMIS Standards and Protocols

- 1. Federal: 2004 HMIS Data and Technology Standards Final Notice
- 2. Federal: 2011 HMIS Requirements Proposed Rule

HMIS Data Quality

- 1. Federal: <u>HMIS Data Standards Revised Notice</u>
- 2. Local: <u>San Francisco Online Navigation and Entry (ONE) System Continuous Data Quality Improvement Process</u>

Privacy

- 1. Federal: Coordinated Entry and Victim Service Providers FAQs
- 2. Federal: Health Insurance Portability and Accountability Act of 1996 (HIPAA)
- 3. Local: Department of Homelessness and Supportive Housing Privacy Practice
- 4. Local: <u>Department of Homelessness and Supportive Housing Notice of Data Sharing and Privacy Policy</u> ("Privacy Notice")





VI. PERIOD OF OPERATION & TERMINATION

Signature of this document immediately enters the Partner Agency and its End Users into the

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VI	I. CONTACT AND LEAD	AGENCIES
Continuum of Care: CA-501: City and County of San	Francisco	
HMIS Lead Agency: San Francisco Department of H 440 Turk Street San Francisco, CA 94102 HMIS Partner Agency:	omelessness and Supportive Ho	using
Agency Name		
Address		
Telephone		
Executive Director Name		
Agency Lead Name		
Agency Lead Title		
	VIII. AGREEMEN	i i
Shireen McSpadden		May 17 th , 2022
Shireen McSpadden		Date
Executive Director, San Francisc	co Department of	
Homelessness and Supportive H	Housing	
Partner Agency Executive Director or Authorized Representative		Date

