



YOUR WAY HOME
MONTGOMERY COUNTY

Your Way Home Montgomery County / PA-504 Continuum of Care

Homeless Management Information System (HMIS) Policy and Procedures Manual



Developed by the Montgomery County Department of
Health and Human Services Office of Housing and
Community Development

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Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual

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Your Way Home Montgomery County- HMIS Governance Charter

1. Purpose

The Montgomery County Your Way Home Continuum of Care (CoC) operates a Homeless Management Information System (HMIS) to record and store client-level information for the numbers, characteristics and needs of those who access homeless services and supportive services within the County of Montgomery, Pennsylvania. The HMIS also collects client information through the Your Way Home Montgomery County (YWH) Call Center, including information on persons at-risk of homelessness or those calling to access homeless services in Montgomery County.

Further, HMIS is used to aggregate data about the extent and nature of homelessness overtime; to produce an unduplicated count of homeless persons; to understand patterns of service use; and to measure the effectiveness of homeless assistance projects and programs. Data produced is used for evaluating program outcomes, producing required HUD reports, and for planning and research purposes which may impact the direction of the Continuum of Care in Montgomery County.

2. Montgomery County CoC Responsibilities

The Montgomery County CoC is responsible for:

- Designating a single information system as the official HMIS software for the Montgomery County geographic area.
- Designating an HMIS Lead to operate the HMIS.
- Providing governance of the HMIS Lead, including:
 - The requirement where the HMIS Lead enter into written HMIS Participation Agreements with each Contributing HMIS Organization (CHO), requiring that CHO's comply with federal regulations regarding HMIS and imposing sanctions for failure to comply;
- Maintaining documentation evidencing compliance with this part and with the governance agreement; and
- Reviewing, revising and approving the policies and plans required by federal regulation.

3. Designations

3.1 HMIS System

The CoC designates Clarity Human Services HMIS from Bitfocus, located in Las Vegas, Nevada as the official HMIS for Montgomery County's CoC.

3.2 HMIS Lead

The Montgomery County CoC has designated the Montgomery County Office of Housing & Community Development (OHCD) as the HMIS Lead to operate the HMIS system in Montgomery County. The designation of the HMIS Lead is reviewed and reauthorized every five years by the Montgomery County CoC Governing Board. The CoC Governing Board selects the HMIS Lead by majority vote with a quorum present.

4. Responsibilities of the HMIS Lead

The HMIS Lead is responsible for:

- Ensuring the operation of and consistent participation by recipients of Continuum of Care (CoC) funds, Emergency Solutions Grants (ESG) Program funds, Community Development Block Grant (CDBG) funds, HOME Investment Partnership Funds and the local Affordable Housing Trust Funds, including oversight of HMIS and any necessary corrective action to ensure HMIS is in compliance with all applicable federal requirements;
- Developing written HMIS policies and procedures for CHO's in accordance with the most recently published HMIS Data Standards from HUD or the CoC;
- Executing a written HMIS Partnership Agreement with each CHO, which includes the obligations and authority of the HMIS Lead and CHO, the requirements of the security plan and privacy policy with which the CHO must abide, sanctions for violating the HMIS Participation Agreement, and an agreement where the HMIS Lead and the CHO will process Protected Identifying Information consistent with the agreement;
- Serving as the applicant to the US Department of Housing and Urban Development (HUD) for CoC grant funds to be used for HMIS dedicated activities for the CoC's geographic area, as directed by the Montgomery County CoC, and entering into grant agreements with HUD to carry out the HUD-approved HMIS activities;
- Monitoring and enforcing compliance by all CHOs with HUD requirements and reporting on compliance to the CoC and HUD;
- Monitoring data quality and taking all necessary actions to maintain input of

high- quality data by all CHOs, including the timely entry and exit dates for all client participants;

- Submit a security plan, an updated data quality plan, and a privacy policy to the CoC for approval within 6 months after the effective date of the HUD final rule establishing the requirements of these plans, and within 6 months after the date any change is made to the local HMIS. The HMIS Lead must review and update the plans and policy at least annually. During this process, the HMIS Lead must seek and incorporate feedback from the CoC and CHO. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Montgomery County CoC.

5. Duties of the HMIS Lead

5.1 Montgomery County CoC HMIS Policies and Procedures

The HMIS Lead must adopt written policies and procedures for the operation of the HMIS with apply to the HMIS Lead, its CHOs, and the Continuum of Care. These policies and procedures must comply with applicable Federal law and regulations, and applicable state or local governmental requirements. The HMIS Lead may not establish local standards for any CHO that contradicts, undermines, or interferes with the implementation of the HMIS standards as prescribed in this part.

5.2 Unduplicated Count

The HMIS Lead must, at least once annually, or upon request from HUD, submit to the Montgomery County CoC an unduplicated count of clients served and an analysis of unduplicated counts, when requested by HUD.

5.3 Reporting

The HMIS Lead shall submit all reports to HUD as required.

5.4 Privacy

The HMIS Lead must develop a privacy policy. At a minimum, this policy must include:

- data collection limitations;
- purpose and use limitations;
- allowable uses and disclosures;
- openness description;
- access and correction standards;
- accountability standards;
- protections for victims of domestic violence, dating violence, sexual assault, and stalking; and
- such additional information and standards as may be established by HUD in notice.

Every organization with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including enforcement of sanctions for noncompliance.

5.5 HMIS Standards

The HMIS Lead, in contracting an HMIS vendor, must require the HMIS vendor and the software to comply with the most recent HMIS standards issued by HUD as part of its contract.

5.6 Participation Fee

The HMIS Lead shall not charge a participation fee for CHOs. Each CHO will be provided with the necessary HMIS licenses at no cost to the CHO.

6. Responsibilities of the CoC YWH HMIS/Data & Outcomes Action Team

The Action Team will work with the HMIS Lead to:

- Develop, annually review, and, as necessary, revise for CoC Board approval a privacy plan, security plan, and data quality plan for the HMIS, as well as any other HMIS policies and procedures required by HUD.
- Develop for Board approval and implement a **data quality** plan for monitoring the HMIS to ensure:
 - Recipients and Sub-recipients consistently participate in HMIS;
 - HMIS is satisfying the requirements of all regulations and notices issued by HUD;
 - The HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Agreement with the Montgomery County CoC, including the obligation to enter into written participation agreements with each contributing HMIS organization.
- Oversee and monitor HMIS data collection and production of the following HUD-required reports:
 - **Point-in-Time Count and Housing Inventory Count**
 - The Point in Time Count is a count of sheltered and unsheltered people experiencing homelessness on a single night in January. Data sources include HMIS (sheltered count report), ArcGIS or paper surveys (unsheltered count), and/or spreadsheets (non-HMIS-participating shelters). Data are submitted to HUD in HDX.
 - The Housing Inventory Count is a point-in-time inventory of provider programs within a Continuum of Care that provide beds and units dedicated to serve people experiencing homelessness. Data sources include HMIS report and provider questionnaire. Data are submitted to HUD in HDX.
 - **Annual Performance Reports (APRs)**

- Annual Performance Review reports must be submitted annually to HUD by all recipients of funding through CoC homeless assistance grants. The APR is generated by HMIS and comparable databases. Data are submitted to HUD in Sage.
- **System Performance Measures (SPMs)**
 - System Performance Measures are intended to measure a community's performance as a coordinated system and examine progress over time. SPMs can additionally be used to analyze specific projects or project types. SPMs are generated by HMIS. Data are submitted to HUD in HDX.
- **Longitudinal System Analysis (LSA)**
 - The Longitudinal System Analysis provides HUD and Continuums of Care (CoCs) with critical information about how people experiencing homelessness use their system of care. The LSA report is a .csv fileset generated by HMIS. Data are submitted to HUD in HDX 2.0.
- **Stella P and Stella M**
 - Stella P and Stella M provide dynamic visuals of a CoC's Longitudinal Systems Analysis (LSA) data to illustrate how households move through the homeless system, and to highlight outcome disparities. CoCs can access their Stella P and Stella M reports in HDX 2.0.

7. Responsibilities of the CHO

A CHO must comply with federal regulations regarding HMIS.

A CHO must comply with Federal, state, and local laws which require additional privacy or confidentiality protections. When a privacy or security standard conflicts with other Federal, state, and local laws to which the CHO must adhere, the CHO must contact the HMIS Lead and collaboratively update the applicable policies for the CHO to accurately reflect the additional protections.

8. Joint HMIS Lead-CHO Responsibility for Privacy

The HMIS Lead and the CHO using the HMIS are jointly responsible for ensuring HMIS processing capabilities remain consistent with the privacy obligations of the CHO.

Your Way Home Montgomery County- HMIS Policy and Procedures

Your Way Home Montgomery County Overview

Your Way Home Montgomery County / PA-504 Continuum of Care (YWH) is a transformational partnership between government, philanthropy, non-profits, and community partners to solve the problem of homelessness in our community. Our vision is: by creating more coordination, collaboration, and communication between partners, we will ensure everyone who lives, works, learns, and invests in Montgomery County, Pennsylvania has the opportunity to live in an affordable home and a thriving community.

Your Way Home Montgomery County's guiding principles include:

- Housing is a human right.
- Homelessness and poor quality housing can negatively affect health and well-being.
- Families and individuals experiencing homelessness should be provided stable, permanent housing with a standard lease agreement and rights of tenancy, but without preconditions or barriers.
- Housing is a major driver of economic growth and essential to community development.
- People should be able to live near their places of work, worship, and social networks.
- Health, homeless, and human services which promote housing stability should be equitable, responsive, and trauma-informed.

Shared data systems are a core strategy for increased communication between partners. Recognizing a need to enhance the use of data between and by YWH partner agencies, the YWH Data Action Team, comprised of members from government, non-profit, and philanthropic partners, created this manual to standardize system policies and to increase use of data collected through YWH's data systems. The following HMIS Policy and Procedures Manual is the result of their work, and is based on the following core priorities:

- Secure and ethical use of individuals' personal information;
- A high level of connectivity and transparency between partner agencies;
- Comprehensive training for data quality and for informed use of data at all levels.

Montgomery County HMIS

This policy Manual is intended to provide a baseline of data sharing, security, training, and data quality policies for the Homeless Management Information System (HMIS) in use by Your Way Home partner agencies under the administration of the Montgomery County Office of Housing and Community Development.

E-mail communication between agencies is not subject to the sharing policies in this manual; however, agencies are strongly encouraged to review their internal policies and practices to ensure client-level information shared via e-mail is kept secure and confidential through

encryption or depersonalizing information.

Agency/ Provider Coverage

Any agencies participating in Montgomery County's HMIS, Clarity Human Services, procedures outlined in this manual.

Administration and Governance

Administration of the Montgomery County's HMIS is the responsibility of the Montgomery County Office of Housing and Community Development. This section outlines the roles and responsibilities within the Office for ensuring operation of the systems. The process for user management authorized agency management, and training is also identified. Lastly, the partnership agreement policy is explained.

Governance of the HMIS is the joint responsibility of the Office of Housing and Community Development and the Continuum of Care Governing Board. The HMIS Governance Charter (Appendix A) explains the roles and processes for governance decisions relating to the County's HMIS

1. HMIS Governance Charter

Policy: In accordance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, the Montgomery County Office of Housing and Community Development, as the HMIS Lead Agency, has developed and approved an HMIS Governance Charter describing the roles and responsibilities regarding the local HMIS. The HMIS Governance Charter is reviewed annually by the Your Way Home PA-504 CoC Governing Board.

Procedure: The Office of Housing and Community Development will maintain compliance with, and recommend changes as necessary to, the HMIS Governance Charter. The Your Way Home PA-504 CoC Governing Board will review and approve any changes to the HMIS Governance Charter.

2. Montgomery County HMIS Partnership Agreement

Policy: Only authorized agencies will be granted access to the County's HMIS, Clarity Human Services. The Montgomery County Office of Housing and Community Development shall make the final determination to identify Authorized Agencies. The Executive Director of each Authorized Agency, or the Administrator of the County Office, will be required to sign a Montgomery County HMIS Memorandum of Understanding (MOU) binding their organization to the Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual and all applicable Federal, State, and local laws and regulations regarding the handling of client data before access is granted.

Procedure: Authorized Agencies will be given a copy of the Montgomery County HMIS Partnership Agreement (Appendix B), the Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual, and any other relevant paperwork in time for adequate review and signature. Once paperwork has been reviewed and signed by the Executive Director, the Executive Director will need to identify one Clarity HMIS Agency Manager on the User Authorization Form, as applicable. The HMIS Data Manager and/or Your Way Home Program Manager will assist the Agency Manager in the identification, training, and enrollment of additional authorized users, and in the creation of programs and services appropriate for the agency.

3. HMIS Data System Management

Policy: As Your Way Home's primary staffing and administrative body and the HMIS Lead Agency, the Montgomery County Office of Housing and Community Development maintains and administers the YWH Data Systems on behalf of Your Way Home partner agencies, including but not limited to the County's Homeless Management Information System (HMIS).

The Office of Housing and Community Development is responsible for entering into and maintaining the terms of the contract with the selected HMIS database vendor. All final decisions regarding the purchase, implementation, and operation of the HMIS are subject to approval by the Office of Housing and Community Development or by the Board of Commissioners of the County of Montgomery where appropriate and applicable.

The Office of Housing and Community Development will own the license(s) and account information for any shared client management systems in use by Your Way Home. Any final decisions regarding the purchase or use of these systems are the responsibility of the Office of Housing and Community Development.

Procedure: The Office of Housing and Community Development will oversee and operate the HMIS on behalf of Your Way Home Montgomery County. The County of Montgomery, via the Office of Housing and Community Development, will maintain the contract with the HMIS vendor for use and operation of the HMIS. All final decisions regarding the HMIS, its operating policies and procedures, and the data collected via the database are subject to final approval by the Office of Housing and Community Development or the Board of Commissioners of Montgomery County, where appropriate and applicable.

The Office of Housing and Community Development will purchase licenses for other shared client management lists in use by Your Way Home and will manage the shared lists as appropriate and as needed for implementation of Your Way Home activities.

4. Systems Administration

Policy: The Office of Housing and Community Development's HMIS Data Manager will oversee the day-to-day operation of YWH Data Systems. The HMIS Data Manager or Your Way Home Program Manager will provide training, policy guidance and development, helpdesk assistance, and reporting assistance for participating agencies. In addition, all new accounts and account terminations will be processed and approved by the HMIS Data Manager or Your Way Home Program Manager. Changes to the HMIS user interface will be completed by the HMIS Data Manager in conjunction with the HMIS vendor.

Procedure: The HMIS Data Manager or Your Way Home Program Manager will provide final approval for account authorizations or terminations for the YWH Data Systems. The HMIS Data Manager or Your Way Home Program Manager will provide training, policy guidance, helpdesk support, and reporting assistance to support agencies' full and appropriate use of HMIS.

5. Partnership Agreement termination initiated by Authorized Agency

Policy: Authorized Agencies may terminate the Montgomery County HMIS Partnership Agreement with or without cause upon 30 days written notice to the Montgomery County Office of Housing and Community Development according to the terms specified in the Montgomery County HMIS Partnership Agreement. The termination of the Montgomery County HMIS Partnership Agreement by the Authorized Agency may affect other contractual relationships with the Office of Housing and Community Development, the Your Way Home Advisory Council, and/or requirements set forth in contracts issued by the U.S. Department of Housing and Urban Development.

In the event of termination of the Montgomery County HMIS Partnership Agreement, all data entered into the HMIS will remain an active part of the county's HMIS.

Procedure: The person responsible for signing the Montgomery County HMIS Partnership Agreement (or a person in the same position within the agency) will notify the HMIS Data Manager 30 days or more from the date of termination. The HMIS Data Manager or proxy will disable all user accounts from the Authorized Agency on the date of termination of agreement.

6. Partnership Agreement termination initiated by the Montgomery County Office of Housing and Community Development

Policy: The Office of Housing and Community Development may immediately terminate the Montgomery County HMIS Partnership Agreement with written notice to the Authorized Agency in the event the Authorized Agency willfully violates or disregards the terms of the HMIS Partnership Agreement or the Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual. The Office of Housing and Community Development may also terminate the Montgomery County HMIS Partnership Agreement with the agency with or without cause with 30 days written notice to the Authorized Agency and according to the terms specified in the Montgomery County HMIS Partnership Agreement. The termination of the Montgomery County HMIS Partnership Agreement may affect other contractual relationships with the Office of Housing and Community Development, the Your Way Home Leadership Council, the U.S. Department of Housing and Urban Development, or other funders. In the event of termination of the Montgomery County HMIS Partnership Agreement, all data entered into the HMIS will remain a part of the HMIS. If termination of the Montgomery County HMIS Partnership Agreement occurs, all Authorized Agency user accounts will be disabled on the date the Montgomery County HMIS Partnership Agreement is terminated.

Procedure: Agencies funded by the U.S. Department of Housing and Urban Development, either directly or indirectly through the Montgomery County Office of Housing and Community Development, are required to participate in the County's HMIS as a condition of their funding. In the event of termination of the Montgomery County HMIS Partnership Agreement, the Office of Housing and Community Development will notify the Authorized Agency 30 days or more from the date of termination. In all cases of termination, the HMIS Data Manager will disable all user accounts on the date of termination of the agreement.

7. User Account Creation

Policy: The agency manager or proxy provides authorization for new users to the HMIS. The agency manager or proxy will complete a User Authorization form for any new users to the HMIS and will send to the HMIS Data Manager or Your Way Home Program Manager for account creation.

Only Montgomery County Office of Housing and Community Development staff members are authorized to create new user accounts to the county's HMIS and/or Your Way Home client management systems. User accounts will be unique for each user and may not be exchanged or shared with other users. Shared accounts may be granted for Review Only access to the HMIS, and only with prior review and approval of the HMIS Data Manager or senior staff of the Office of Housing and Community Development.

Accounts which have remained dormant for 30 days or longer will be deactivated in the County's HMIS, Clarity Human Services.

Procedure: The agency manager or Executive Director will provide authorization for new users to the HMIS and/or Your Way Home client management systems by submitting a User Authorization Form (Appendix C) to the HMIS Data Manager or Your Way Home Program Manager. The HMIS Data Manager or Your Way Home Program Manager will arrange training on the appropriate system(s). Users must sign a User Agreement (Appendix D) prior to receiving access to the HMIS and/or Your Way Home client management lists. This policy also applies to users of shared Review Only accounts.

8. Passwords

Policy: Users will have access to the HMIS through a username and password. Passwords to HMIS must be changed a minimum of every 90 days. Users will keep passwords confidential. Under no circumstances shall a user share a password, unless the user has been granted access to a shared Review Only account. Users must not ever post a password in an unsecured location.

Procedure: Upon sign in with the temporary password, users will be required to create a unique password known only to him/her. Every 90 days, users will be prompted to change this password. Users that share their password with another person may be subject to termination from the HMIS. For shared Review Only accounts, the temporary password will be provided to the agency manager, who is responsible for password management of the account.

9. User Agreements

Policy: Each user must sign a User Agreement before being granted access to YWH Data Systems. By signing the form, the user agrees to abide by the Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual, to uphold the confidentiality of personal information, and to only collect, enter, and retrieve data from YWH Data Systems in ways relevant to the delivery of housing services.

Procedure: Each user will be provided with a copy of the User Agreement by the HMIS Data Manager or proxy upon account authorization. The user will sign the User Agreement and return to the HMIS Data Manager or Your Way Home Program Manager. The original will be maintained by the Office of Housing and Community Development. Allowing user access without a signed user agreement is a violation of the Montgomery County HMIS Partnership Agreement and the Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual and may result in sanctions

10. Training

Policy: The HMIS Data Manager is responsible for defining the training requirements for all users for the YWH Data Systems. Agencies and staff are encouraged to request specific trainings as they are needed. The training requirements are outlined in the Training Policy. At a minimum, all new users are required to undergo training prior to account activation.

Users who have not logged into the system for one year or more are required to undergo training before being granted access to the HMIS again. Accounts that have remained dormant for 30 days or longer will be deactivated in the County's HMIS, Clarity Human Services; these accounts may be reactivated without required retraining if the user contacts the HMIS Data Manager or proxy prior to 365 days of inactivity.

Procedure: The Your Way Home Program Manager, HMIS Data Manager, or proxy will provide training for all users of the YWH Data Systems consistent with the requirements and standards outlined in the Training Policy, but at a minimum, for all new users before account activation. In the event a user's data entry does not meet this manual's standards, further training may be mandated for the user to retain access.

11. Subcontracted Agencies

Policy: Staff of subcontracted agencies may have user accounts created as staff of the primary contracted agency. Subcontracted agencies must still sign the HMIS Partnership Agreement and receive approval as an Authorized Agency. The agency manager or proxy of the primary contracted agency is responsible for submitting the User Authorization form, and staff must sign the User Agreement form before receiving training and a user account. The HMIS Data Manager retains final approval of user account creation for subcontracted agencies.

Procedure: The agency manager of the primary contracted agency will provide authorization for new subcontracted staff users by submitting a User Authorization Form (Appendix C) to the HMIS Data Manager or Your Way Home Program Manager. The HMIS Data Manager or Your Way Home Program Manager will arrange training on the appropriate system(s). Users must sign a User Agreement (Appendix D) prior to receiving access to the HMIS and/or Your Way Home client management lists. Staff of subcontracted agencies will have user accounts created under the primary contracted agency's record in HMIS.

12. Policy Updates

Policy: The Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual is subject to review and revision as appropriate. New policies may be added to the HMIS Policy and Procedures Manual by the HMIS Data Manager, as needed. When substantive changes are needed, an Action Team may be called by the HMIS Data Manager to review these policy changes and to provide input and/or recommendations on policy and procedural changes. Whenever changes are made to the HMIS Policy and Procedures Manual, the HMIS Data Manager will provide an updated copy to all users and will make training available, if appropriate.

Procedure: The HMIS Data Manager may add policies and/or procedures as appropriate and needed to this manual at any time. When substantive changes are needed, the HMIS Data Manager will call an Action Team of relevant members and participants to provide input and recommendations as appropriate. The Data Action Team and CoC Governing Board will be briefed on these changes. The HMIS Data Manager retains final approval of all changes to the

Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual.

When changes are made, a new copy of the Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual will be distributed to all users. Training on new policies will be made available by the Office of Housing and Community Development, if appropriate, requested by authorized agencies, or when required by the HMIS Data Manager. Additionally, the HMIS Policy & Procedures Manual is available publicly at: www.yourwayhome.org/resources-1

Data Sharing, Privacy, and Security Plan

Your Way Home operates via a highly connected service structure, in which agencies providing different services work together, with an individual or family, to coordinate resources to best support the movement towards safe, affordable, and stable housing. The need to share information is inherent in this process; however, privacy and security of personal information is necessary to maintain integrity in the data systems and to foster trust between persons seeking services and the agencies providing those services.

This Data Sharing, Privacy, and Security Plan outlines the rights of individuals and families being served to protect their personally-identifying information. Outlined below are the specific procedures all staff must take in order to document appropriate permission has been obtained to share this information, as well as how to properly de-identify the personal information of those clients who choose to opt out of sharing their personally-identifying information. This Plan also addresses specific protections in place for persons fleeing domestic violence, sexual harassment, dating violence, or stalking. Lastly, this Plan outlines the ethical expectations for all users that have access to the Clarity HMIS.

1. Shared Homeless Management Information System (HMIS)

Policy: Your Way Home is a collaborative, community-wide effort to provide housing-related services to families and individuals experiencing homelessness, and as such, partner

agencies must have the ability to share pertinent information about joint clients' service needs. The County's HMIS, Clarity Human Services, is maintained as a collaborative, shared system in order to facilitate coordination between agencies serving the same client, and to assist persons experiencing homelessness with accessing services as quickly as possible, with a minimum of duplication of intake and data collection processes.

The County's HMIS will be maintained as a shared system among Authorized Agencies. All participating agencies will have the following standardized sharing settings established by default:

System Component	Sharing Setting
Clients Created	Full Shared
Programs, Services, and Assessments	Full Shared
Case Files	Full Shared
Case Notes	Full Shared

The HMIS Data Manager or proxy will establish the data sharing settings for the

2. **Agency during the agency set-up process. When working with a client in a program, agency staff may choose to mark Case Files or Case Notes "Private" which overrides the Full Shared settings and limits access to only members of that Agency Data Entry Requirement and Client Right to Opt Out**

Policy: The collection of client-level data is necessary for Your Way Home's ability to understand how its programs are improving the housing stability of persons experiencing homelessness in Montgomery County. To ensure Your Way Home partner agencies, leadership, and funders have an accurate understanding of program operations, it is essential that complete data is collected on all clients who receive services. Montgomery County's HMIS operates under a policy of implied consent in which participating agencies will enter client-level data as a function of a client accepting services or requesting a referral for services. Neither clients nor participating agencies have the right to refuse to enter client-level data into Montgomery County's HMIS.

Participating agencies must post a policy statement at each of their client service sites to inform current and potential clients their data will be entered into HMIS. For Agencies meeting with clients in the field, this statement may be read aloud and signed, and a copy may be handed to the client to keep.

All persons accessing services have the right to opt out of sharing their personally-identifying information within HMIS. Agencies are prohibited from refusing services to persons who choose to opt out of sharing their Personally Identifiable Information (PII). Call Center or Agency staff must follow the protocol under the "Policy on Entering Non-Identifying Information" for those persons who choose to opt out of sharing personally-identifying information in HMIS, or the protocol under the "Policy on Entering Non-Identifying Information for all Persons Fleeing Domestic Violence" for clients actively fleeing domestic violence or with a history of domestic violence.

Procedure: All participating agencies must post and/or share a Your Way Home HMIS Privacy Posting that clearly describes the data entered HMIS and how the data are used (Appendix E). Agencies must enter all client-level data into YWH Data Systems in accordance with the Data Quality Policy requirements and may be sanctioned as outlined in the Data Quality Policy for not meeting the data entry requirements.

At the point of Coordinated Entry (i.e., before the Client Profile is created in Clarity HMIS) the Call Center or Agency staff are required to obtain one of the following:

1. Recorded verbal consent: The client must read the Verbal Clarity HMIS Consent Statement (Appendix G) and give a "Yes" response. Verbal consent must be tracked on the client profile using Clarity HMIS.
2. Written client consent: The client must complete and sign the YWH Data Systems Release of Information (Appendix F) and be provided with a copy. A signed PDF copy of this form needs to be uploaded into Clarity HMIS.

In either case, Call Center or Agency staff will follow the protocol outlined in the “Policy on Entering Non-Identifying Information” for any clients choosing to opt out of sharing Personally Identifiable Information (PII), or “Policy on Entering Non-Identifying Information for all Persons Fleeing Domestic Violence” for clients actively fleeing domestic violence or with a history of domestic violence.

3. Entering Non-Identifying Information into HMIS

Policy: Every client has the right to choose to opt out of sharing their PII within the YWH Data Systems. PII refers to the person’s Name, Date of Birth, Address, and their Social Security Number, including use of the last 4 digits. If a client chooses to opt out of sharing PII, then the agency staff person will use the standardized convention for entering de-identified information into Clarity HMIS, which is known as the client’s YWH Code. The staff will record the YWH Code on the Client’s Release of Information and/or Client File where indicated. The YWH Code will be used in HMIS in place of the client’s name.

It is the participating agency’s responsibility to accurately update and otherwise maintain the HMIS records of any client choosing to opt out of entering PII. Agencies must establish internal policies ensuring the YWH Code is properly recorded and maintained in a client’s file such that a supervisor would be able to locate the YWH Code within the client’s file at any time.

Procedure: For clients who choose not to share their PII, staff will use the following convention to enter data into Clarity Human Services:

Client Profile Data Element	De-Identified Response
First Name	First three letters of first name, first initial of last
Last Name	Clarity-generated Unique Identifier
Quality of Name	Partial, street name, or code name provided

Social Security Number	000-00-0000
Quality of Social Security Number	Approximate or partial SSN reported
Date of Birth	1/1/year of birth
Quality of Date of Birth	Approximate or Partial DOB Reported

Example: John Smith, born August 1, 1978, with Social Security Number 768-75-8767, with the system-generated Unique Identifier of AAA1111:

First Name: JOHS
 Last Name: AAA1111
 Social Security Number: 000-00-0000
 Date of Birth: 01/01/1978

On the bottom of the client's Release of Information form, this would be recorded as the YWH Code of "JOHS AAA1111."

The YWH Code would be used on any other YWH Data Systems in place of the client's name.

4. Revocation of Consent to Share Personally Identifiable Information in Clarity HMIS

Policy: Clients maintain the right to revoke their consent for sharing Personally Identifiable Information (PII) in Clarity HMIS at any time. If a client decides to revoke this consent, they must sign a new Release of Information. The Agency staff person responsible for entering data into Clarity HMIS must then overwrite the client's profile information using the protocol established in the Policy on Entering Non-Identifying Information.

Procedure: Clients may revoke their consent to share PII by signing a new Client Release of Information. The data entry staff is responsible for updating this all fields containing PII on the Client Profile using the protocol in the Policy on Entering Non-Identifying Information within 5 business days of the client signing the form. The Agency must upload a signed PDF copy of the new Release of Information form into Clarity HMIS.

5. Entering Non-Identifying Information into Clarity HMIS for all Persons Fleeing Domestic Violence

Policy: All people actively fleeing domestic violence will be entered into Clarity HMIS without the use of personally-identifying information (PII).. For households in which the head of household is fleeing domestic violence, the profiles for other household members must also be de-identified.

Please note domestic violence survivors may authorize their PII be recorded normally in HMIS after signing a Release of Information. However, an agency's primary concern must be the client's safety; profiles may remain de-identified whenever necessary.

Projects should be especially sensitive to the collection of domestic violence information from clients and should implement appropriate interview protocols to protect client privacy and safety such as: asking about domestic violence status in a private location, and not in the presence of a romantic partner, and delaying all entry of data about clients identified with a recent history of domestic violence.

If the domestic violence status changes to actively fleeing domestic violence for a person and/or household already entered into HMIS, their profile should be de-identified using the procedure below.

Procedure: Staff will assist the client in completing a Release of Information as appropriate and upload a signed PDF copy into Clarity HMIS. Clients who are no longer actively fleeing domestic violence may agree to share personally-identifying information in the Clarity HMIS, but must sign a new Release of Information in order to do so.

Staff will use the following convention to enter fields containing personally-identifying information into Clarity Human Services for each Head of Household and Adults:

Client Profile Data Element	De-Identified Response
First Name	DV + first three letters of first name + first letter of last name
Last Name	Clarity-generated Unique Identifier
Quality of Name	Partial, street name, or code name provided
Social Security Number	000-00-0000
Quality of Social Security Number	Approximate or partial SSN reported
Date of Birth	1/1/year of birth
Quality of Date of Birth	Approximate or Partial DOB Reported
Race	Client Refused

Staff will use the following convention to enter fields containing personally- identifying information into Clarity Human Services for each dependent child in a household:

Client Profile Data Element	De-Identified Response
First Name	DVK + first three letters of first name + first letter of last name
Last Name	Clarity-generated Unique Identifier
Quality of Name	Partial, street name, or code name provided
Social Security Number	000-00-0000
Quality of Social Security Number	Approximate or partial SSN reported
Date of Birth	1/1/year of birth
Quality of Date of Birth	Approximate or Partial DOB Reported
Race	Client Refused

6. Coordinated Entry Procedures for Entering Personally-Identifying Information into Clarity Human Services

Policy: The Your Way Home Call Center or Agencies using the CoC's Coordinated Entry Program will record verbal consent or obtain written consent prior to entering personally-identifying client information into Clarity HMIS. Verbal consent will be tracked in Clarity HMIS and written consent will require a signed PDF copy of the Release of Information Form is uploaded to the Client Record in Clarity HMIS.

Clients who refuse to share their personally-identifying data, including persons identifying as actively fleeing a domestic violence situation, will be entered into Clarity HMIS using the naming convention described in the Policies on Entering Non-Identifying Information. Call Center or Agency staff will then use the YWH Code in the Client File as needed.

Procedure: Call Center or Agency staff will read the Verbal Clarity HMIS Consent Statement (Appendix G) to clients before entering data into Clarity Human Services and will track the client's response on the Client Profile page. The Call Center or Agency will use the protocol established in the Policy on Entering Non-identifying Information for any client that chooses not to share information and in accordance with the Policy on Persons Fleeing Domestic Violence. The Call Center or Agency will use the YWH Code in place of the person's name on any Client Files.

7. Ethical Data Use

Policy: All persons with access to Clarity HMIS are expressly prohibited from searching for, viewing, tampering with, or otherwise accessing client-level data on persons not assigned to their caseload, who have not been referred for services, or who otherwise are not working directly with the case worker or their supervisees.

Any person found to be violating this policy will be terminated immediately from Clarity HMIS. Any agency without the ability to enter data into Clarity HMIS may be at risk for funding as a result of the statutory requirement for many federal grants to participate in the county HMIS.

Procedure: Persons with access to Clarity HMIS will use this privilege ethically and with the highest regard for client privacy and security of information. Any person found or discovered to be viewing, accessing, tampering with, using, downloading, or otherwise accessing information on clients not on their caseload or referred for services, or those of their supervisees, will be terminated immediately from Clarity HMIS access, and may be subject to further action as determined by the County of Montgomery.

8. Breach or privacy incidents involving Personally Identifiable Information (PII)

Policy: In the event the Office of Housing and Community Development learns of a breach or privacy incident involving Personally Identifiable Information, an incident-reporting, evaluation, response, and notification procedure will be initiated within one hour of discovery/detection of the breach.

Personally Identifiable Information (PII) refers to information that can be used to distinguish or trace an individual's identity, such as name, social security number, and biometric records; individually or when combined with other personal or identifying information that is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc. Some examples of PII include name, date of birth (DOB), email address, mailing address, medical history, family relationships, vehicle identifiers including license plates, unique names, certificate, license, telephone and/or other specific reference numbers and/or any information that can directly identify an individual.

Breaches are situations where unauthorized individuals have access or potential access to PII, and are one type of privacy incident. Other types of privacy incidents include using PII for purposes reasons other than what was stated when the information was originally collected, exceeding the retention period for PII, and collecting and/or using PII without first providing proper notice. The term "privacy incident" encompasses both suspected and confirmed incidents involving PII. It includes information in both electronic and paper format and information maintained in a system of records, such as the County's HMIS.

All HMIS users and CHOs are required to report any known or suspected breach and/or privacy incident to the CoC's Data Manager and Program Manager immediately.

Procedure: In the event of a breach or privacy incident, the following process will occur:

1. Incident Report to the CoC's Data Manager and/or Program Manager
2. Incident Report to the Deputy Director and/or Administrator of Montgomery County's Office of Housing and Community Development, Privacy Officer of Montgomery County's Department of Health and Human Services, Solicitor's Office of Montgomery County
3. Incident Report to the HMIS Vendor, Bitfocus Inc. (request contact specific to this incident)
4. Evaluation of incident by an Incident Response Team comprised of individuals noted in Steps 1 - 3 of the Procedure
5. Response to incident
6. Notification of affected Individuals and/or Third Parties

9. Case Note Sharing

Policy: Case note features are available within Clarity HMIS for use by any participating agency, though some programs are required to keep case notes in order to better facilitate service coordination:

- (1) Referral notes are used by the Call Center to more fully describe housing crisis situations at the point of referral,
- (2) all core homeless project types (street outreach, emergency shelter, transitional housing, rapid re-housing, and permanent supportive housing) are required to maintain a publically-viewable case note on client's progress towards moving into and maintaining permanent housing, and
- (3) supportive service providers are strongly encouraged to adopt similar protocols internally

to better coordinate with housing programs.

Notes are intended to be shared with other agencies for the purposes of service coordination , with the exception of notes that contain Protected Health Information (PHI) or Domestic Violence information, or at an Agency’s discretion with the approval of the Your Way Home Program Manager. These should be marked as private in HMIS and will only be viewable by other users within the Authorized Agency and the staff members of the Office of Housing and Community Development.

Users with access to Clarity HMIS are prohibited from viewing case notes recorded for clients other than those on their caseload or referred for services, in accordance with the Policy on Ethical Data Use.

Procedure: All case notes entered by users will be objective, concise, and maintain professional standards for documentation. Content of notes will reflect the service provided by the agency to a client, provide updates on a client’s status, and/or other pertinent information necessary for case coordination with other agencies. Whenever possible, users will not include a client’s personally identifying information in a note, particularly their name, in the event that client’s record needs to be de-identified in the future.

10. Case Note Content and Frequency

Policy: Every substantive follow up interaction with a client must be documented via a case note in Clarity HMIS to provide the Your Way Home Program Manager and partner agency staff with timely information regarding a client’s housing situation.

A substantive interaction includes:

- phone calls and text messages,
- emails,
- home visits,
- office visits, and
- other interactions in which the client’s housing stability, case management plan, access or referrals to services, or other relevant information is discussed.

All case notes must provide enough information so that others working with the client are able to determine the purpose and result of the interaction.

Each interaction must be timely documented via a note in Clarity Human Services within 2 business days of the interaction occurring.

Interactions regarding Street Outreach, Call Center assessments and referrals, and shelter intake must be documented by close of business on the same day the interaction occurred. Case staff must mark notes as “private” per the guidelines of the Case Note Privacy policy.

Agencies will be monitored for compliance with this policy through desk monitoring and on-site monitoring of case files.

See the Your Way Home Policies and Procedures manual for further instructions and expectations regarding the frequency and content of Case Notes.

Procedure: Staff will record a case note in the Clarity HMIS Client Profile of the Head of Household within 2 business days of every substantive interaction with a client, or by close of business on the same day for all interactions regarding street outreach, Call Center assessments and referrals, and shelter intake/enrollment.

11. Inter-agency referrals for clients entered with YWH Code

Policy: Because Your Way Home's Coordinated Entry network connects clients from referral sources ("referring agency") to agencies that provide services ("receiving agency"), certain basic information about a client must be transmitted in order for the receiving agency to know the identity of the client they are contacting for service enrollment. However, clients that refuse to share information to the general Your Way Home database but still request services are entered into Clarity HMIS using the "Your Way Home Code", which replaces the client's actual name and other protected personal information.

To allow a receiving agency to know the identity of a person referred with a Your Way Home Code, the referring agency will send a message via the Secure Messaging Inbox containing the basic identifying information of the client being referred. The Secure Messaging Inbox is an encrypted messaging service, which provides more security and privacy than email for transmitting information between agencies.

Procedure: When referring a client with a Your Way Home Code to another agency for services, the referring agency will send a message containing the client's YWH Code and actual name to the receiving agency via the Secure Messaging Inbox in Clarity HMIS.

Data Quality Plan

The purpose of recording data is to plan and improve services. For this data to be useful, it must be of high quality, and those using it must trust that information has been recorded accurately and consistently across the system. The Data Quality Plan outlines the four main components of quality data in HMIS:

- Timeliness
- Completeness
- Accuracy
- Knowledge

The Plan explains the purpose of each component and how each component is measured and reviewed specifically within the HMIS. This Plan also explains the monitoring process for data quality and compliance with policies and procedures, and the ramifications if data quality and/or policies in the HMIS Policy and Procedures Manual are not met.

Lastly, this Plan acknowledges that knowledge of how to use data for analysis and quality improvement is also a core component of a high quality data system. Training policies for agency managers/directors and expectations for engagement in continuous quality improvement processes utilizing data are outlined here as well.

1. Timeliness

Rationale: Timely data entry ensures that information is accessible when needed, either for other service providers to understand a client's housing plan or current situation, to make bed availability known for persons seeking shelter, or to provide timely information to the community on the progress of Your Way Home toward meeting its goals.

Timeliness within this Plan refers to the time between when an event occurs and when it is recorded in the data system. Ideally, all events are recorded in real-time, especially those regarding referrals and program enrollment. In practice and policy, some lag time is permitted in order to acknowledge the competing demands on staff time.

1A. Timeliness of Program Referral, Enrollment, and Exit Data

Policy: The Office of Housing and Community Development requires that all data be entered in a timely manner, as close to the date of entry, exit, or service provided as possible. Specifically:

- Persons calling the Call Center are entered into HMIS on the same day of their call.
- Information about referral acceptance/denial will be entered into HMIS on the same day of the decision.
- Persons enrolled into any program will be enrolled into the HMIS program within 2 business days of enrollment.

- Persons exiting a program will be exited from HMIS within 2 business days of exit.
- Case notes regarding Call Center assessments and referrals, street outreach contacts, and shelter enrollment will be entered by close of business on the same day the interaction occurred. All other case notes will be entered within 2 business days for core homeless providers. Supportive service providers are encouraged to maintain similar timeframes for case note entry.

Some programs administered by the Office of Housing and Community Development may require that data be entered into HMIS before invoices are processed.

Agencies that routinely enter data much later than the expected time frame will be required to be retrained in HMIS.

Procedure: The HMIS Data Manager or proxy will encourage agencies to manage timely data entry through regular sharing of bed availability reports, monitoring of referral statistics reports, and review of financial assistance records for grant programs requiring HMIS data entry. Any concerns or issues regarding timeliness of data entry will be communicated to the agency by the HMIS Data Manager or the Your Way Home Program Manager; retraining or data entry technical assistance may be required if timeliness issues persist.

1B. Timeliness of Annual Assessments

Policy: Per HUD HMIS Data Standards, every person enrolled in a program for at least one year must also have an *Annual Assessment* recorded no more than 30 days before or after the anniversary of the head of household's Project Start Date

Procedure: The HMIS Data Manager can automatically set reminders to user accounts to alert when an assessment is needed. It is the user's responsibility to complete this assessment as notified.

Proper completion of the Annual Performance Report requires that an Annual Assessment be completed for any client enrolled in the program for one year. The report will not include a Status Assessment used in place of the Annual Assessment or annual assessments that fall outside 30 days of the program enrollment anniversary. Agencies that do not enter the Annual Assessment within the appropriate time-frame will not be able to complete the Annual Performance Report successfully. This may affect an agency's ranking in the following year's CoC Grant Competition.

1C. Timeliness of Prior Living Situation and Current Living Situation

Policy: Per HUD HMIS Data Standards, the Prior Living Situation data element is to be used with other information to identify whether or not a client appears to meet the criteria for chronic homelessness at various points of enrollment.

Prior Living Situation captures where the client slept the night before contact with a project. The

Current Living Situation Assessment data element records each contact with people experiencing homelessness by Street Outreach, Coordinated Entry, and other service projects, to provide information on the number of contacts required to engage the client, as well as to document a current living situation as needed in any applicable project.

For projects that do not provide lodging, a client's Prior Living Situation may be the same as their Current Living Situation. Once a client has been enrolled in a Street Outreach Project, Current Living Situation needs to be updated in Clarity HMIS each time a client is seen face-to-face; and [at least every 90 days.](#)

Procedure: The HMIS Data Manager can automatically set reminders to user accounts to alert when a Current Living Situation is needed for a Street Outreach client. It is the user's responsibility to complete this assessment as notified.

Per HMIS Data Standards, Street Outreach projects must enter the date and location of each interaction with a client by recording the client's Current Living Situation. Contacts that require the collection of Current Living Situation include activities such as a conversation between a street outreach worker and client about the client's well-being or needs, an office visit to discuss their housing plan, or a referral to another community service. The first Current Living Situation with the client [will occur at the same point as Project Start Date](#) (and recording of client's Prior Living Situation) and therefore requires a record to be opened in the HMIS for the client.

Coordinated Entry Projects must record Current Living Situation every time a Coordinated Entry Assessment or Coordinated Entry Event is recorded, if the client's living situation changes, or if a Current Living Situation hasn't been recorded for longer than [90 days.](#)

2. Completeness

Rationale Data completeness is essential to Your Way Home's commitment to understanding and providing appropriate services to persons experiencing homelessness. On the program level, missing or incomplete information affects the ability to provide comprehensive care to the client. County-wide, missing or incomplete data negatively impacts the community's ability to accurately draw conclusions about progress or identify gaps in services being provided.

Completeness in this Plan refers to the percentage of data error, as reported via the project's Annual Performance Report and/or Data Quality Report in HMIS.

HMIS records data errors for all data elements for situations including but not limited to:

- Any missing, "Data Not Collected," "Client Refused," or "Client Doesn't Know" responses to data elements in a client's profile, enrollment screen, status/annual assessment screens, or exit screen.

Note: "Data Not Collected" indicates the intake worker did not ask the client the question. If a question was not asked during intake, that response may be used. Otherwise, "Client Refused" or "Client Doesn't Know" should be used if the client was asked the question.

- For clients who have been enrolled in a project for over 365 days, missing Annual Assessments will be recorded as data error for all questions pertaining to annual assessments.

Data elements whose answers do not match, e.g. a client who has a de-identified social number recorded, but a "Full SSN Reported" response for the Quality of SSN data element (HUD data element 3.2, field 2).

Policy: The Office of Housing and Community Development's goal is to collect 100% of all data elements for all clients that receive services from an HMIS-participating agency; however, this may not be possible in all cases. The following represents the minimum threshold for data completeness:

- The acceptable percentage of data error for data elements of all core homeless project types (street outreach, emergency shelter, transitional housing, rapid re-housing, and permanent supportive housing) is 5% or less. As clients have the right to refuse entry of personally-identifying information, these data elements are excluded from this threshold.
- 100% of clients served through HMIS participating programs will be entered into the HMIS system.
- 100% of clients entered into HMIS who exit a program will be exited from the HMIS system.

Procedure: Agencies that submit project-level performance reports will also submit reports of their data quality for the same review period to the HMIS Data Manager or proxy. Any agencies that exceed the threshold described above will be required to update the information in the HMIS to meet the requirements. Any agencies unable to complete the data entry to meet the thresholds will be required to undergo re-training in HMIS and data collection procedures.

At the HMIS Data Manager's discretion, agencies that do not submit project-level performance data may also be required to submit quarterly data quality reports to the HMIS Data Manager or proxy.

3. Accuracy

Rationale: Data accuracy is needed in order to provide a true, complete understanding of homelessness in Montgomery County. Accuracy in HMIS project set-up, Bed and Unit Inventories, and HUD-required data elements are all essential to the community's data integrity. The CoC relies on data accuracy for required HUD Reports, program evaluation,

and service planning. The HMIS Data Manager, Your Way Home Program Manager, and Agency Managers must work together to ensure the accuracy of both project and client-level data.

Data elements requiring regular review for accuracy include:

- Name
- Date of Birth
- Social Security Number
- Data Quality fields for the above
- Prior Living Situation
- Project Start Date, Project End Date, and Housing Move-In Dates (if applicable)
- Disabling Condition
- Income
- Exit Destination

NOTE: Appendix A Section IV: Minimum Data Entry Elements for Notes in Clarity-HMIS has additional detailed requirements for accuracy.

Policy: Data entered into HMIS must accurately reflect the data recorded in the agency's client file or other known information about the client. Use of the Client Doesn't Know, Refused, and Other categories must follow the definitions included in the most recently published HUD HMIS Data Standards. Furthermore, the use of these responses should be very rare, as widespread use of these categories renders program evaluation inaccurate or incomplete. Agencies will be reviewed for meeting the following standards:

- “% of Error Rate” as reported for Data Quality questions in the Annual Performance Report (Q6a-f) shall not exceed 5%, with the exception of refused answers in personally-identifying data elements.
- No data entered into HMIS will be incompatible with the program in which the client is enrolled. (For example, a Permanent Supportive Housing service record for “households with children” should not be added to a household comprised only of adults.)
- Agencies are responsible for maintaining accurate records of a client's change situation. For example:
 - Rapid Re-Housing and Permanent Supportive Housing providers must accurately enter a Housing Move-In Date.

All providers must maintain accurate Household setup: all household members who receive services within a program should be enrolled together utilizing the same program enrollment. Children should not be enrolled independently as Heads of Household when an adult is in the household; households with more than one member should not be enrolled as individuals when receiving service together; all household members should be exited from the program with the same Program Exit Date.

Procedure: Data accuracy will be reviewed quarterly, or more frequently as needed, by the HMIS Data Manager or proxy using the Annual Performance Report and other reporting sources. Responses that may be inaccurate or that may have been entered incorrectly will be reviewed with the Agency. Any Agency that has entered inaccurate information will correct the data within 3 business days.

Any Agency that consistently enters inaccurate information will be required to be retrained in HMIS. The HMIS Data Manager will provide specific guidance or training for any response categories or options that are identified as common problems across agencies.

4. Knowledge

Rationale: In-depth knowledge of the technical aspects of the HMIS is necessary for users to be able to properly record data, pull reports, and maintain security standards for their clients. As the system changes, training updates are needed so that users are familiar with new or additional reporting requirements. Once the core competencies of technical use are in place, agencies must know how to regularly make use of the data for program planning and service improvement.

Knowledge in this Plan refers to knowledge of the data elements and the appropriate response categories, proper implementation of the data sharing policies and procedures, technical use of the system, and knowledge of how to utilize data to evaluate and improve services.

Policy: Each user must have a working knowledge of HMIS responsibilities as they relate to their position as a case worker or agency manager. In addition to the initial training conducted when a user is registered, the following is required:

- All end-users will be contacted with HMIS updates when necessary, and are strongly encouraged to review all guidance as disseminated and to take advantage of training opportunities offered.
- Users may be required to attend additional training in order to ensure consistency across agencies in recording data and consistency with data sharing, privacy, and security policies.
- All agency managers/directors may be required to undergo reporting training, at a minimum for understanding how to generate reports needed for grants and for annual submissions to HUD, as outlined in the Training Policy.
- Users may be required to undergo testing on the HMIS, specifically after start-up training and on a regular basis thereafter. Any user that does not pass the testing benchmarks on system use will be required to undergo re-training or other efforts to increase knowledge, as outlined in the Training Policy.

- Technical assistance with the HMIS and other shared client management systems will be provided by HMIS Data Manager or proxy as needed.
- Users are responsible for requesting specific training or guidance if their training needs are not being met. Requests can be sent to the HMIS Data Manager, or secondly to the Senior Manager of the Office of Housing and Community Development when appropriate.
- All agency managers are encouraged to actively participate in a continuous quality improvement process, in collaboration with the Office of Housing and Community Development, to understand how to measure progress toward goals using data collected from HMIS and other sources.

5. Monitoring

Rationale: Protection of client data and appropriate use of the HMIS system are required to maintain the integrity of Clarity HMIS. Regular agency-level monitoring is necessary to ensure all policies and procedures being followed, and data is being entered accurately.

Monitoring in this Plan refers to desk and on-site monitoring.

Desk monitoring is completed at least quarterly by the HMIS Data Manager or proxy to review timeliness, accuracy, and completeness of agency HMIS records. Desk monitoring is completed using the Annual Performance Report, Referral Statistics Reports, and other reports as needed.

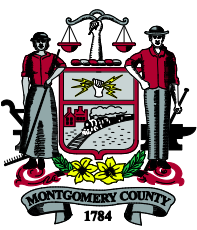
On-site monitoring includes reviewing hardcopy client files to ensure that the proper documentation has been obtained for sharing data within the HMIS, and ensuring that privacy postings are displayed at user workstations consistent with the policies outlined in the Data Sharing and Privacy Plan.

Policy: The HMIS Data Manager, Your Way Home Program Manager, and/or proxy will conduct monitoring as follows:

- Desk monitoring will be conducted at least quarterly to review agency data quality of timeliness, accuracy, and completeness. Results will be shared with the agency manager. Questions or issues with the reports will be reviewed one-on-one. Agencies are expected to correct minor issues within 3 business days. Agencies with major issues may be asked to review the data with the HMIS Data Manager and establish a plan for correcting the data.
- On-site monitoring of client files to ensure the collection and proper execution of Client Release of Information forms will be conducted as part of the regular ESG, CDBG, and/or CoC Program Grant monitoring process in place by the Office of Housing and Community Development.

- If an agency does not meet the data quality requirements for two consecutive quarters, the HMIS Data Manager and/or Your Way Home Program Manager may bring the issue to the attention of the Deputy Director of the Office of Housing and Community Development. The agency may be required to provide a written plan for increasing data quality.
- Continuation of unresolved data quality issues will result in a discussion with Deputy Director of the Office of Housing and Community Development, and may include other county-level or other Your Way Home funders as appropriate. The Office of Housing and Community Development will assist the agency in developing a plan to resolve the agency's data issues, including recommendations for the action to be taken if the agency fails to adhere to the data quality policies ongoing.

Appendix A: Montgomery County HMIS Partnership Agreement



Homeless Management Information System

Partnership Agreement

Between

Montgomery County Health and Human Services, Office of Housing and Community Development

And

AGENCY

This Agreement is entered into on _____ 20____, between the Montgomery County Health and Human Services, Office of Housing and Community Development, hereafter known as MCHHS OHCD, and AGENCY, hereafter known as "Agency," regarding access and use of the Homeless Management Information System, hereafter known as the "HMIS."

I. Introduction

The HMIS is a shared homeless database that allows authorized personnel at various agencies called ("Partner Agencies") throughout Montgomery County to share information on common clients. Goals of the Homeless Management Information System include: ability to expedite client intake procedures, improved referral accuracy, increased case management and administrative tools, and the creation of a tool to follow demographic trends and service utilization patterns of families and individuals experiencing homelessness or those families and individuals on the verge of homelessness.

The project is administered by MCHHS OHCD, a governmental entity organized and governed by the laws of the Commonwealth of Pennsylvania. Pursuant to Resolution No. 04-C 335, the County of Montgomery, entered into a contract dated October 1, 2004, with MetSYS, Inc. to provide various services in connection with HMIS. On August 30, 2011, Bitfocus Inc. bought the assets of MetSYS and the County of Montgomery entered into an Agreement with Bitfocus Inc. to continue the provision of its HMIS services. The County's Transition Agreement with Bitfocus Inc is dated November 1, 2011. Pursuant with this Agreement Bitfocus, Inc. shall house the central server that hosts the Homeless Management Information System and shall limit access to the database to Partner Agencies participating in the project. Bitfocus, Inc. intends to protect Homeless Management Information System data to the utmost of its ability from accidental or intentional unauthorized modification, disclosure, or destruction, and Bitfocus, Inc. does this by utilizing a variety of methods to guard the data.

Ultimately, when used correctly and faithfully by all involved parties, the Homeless Management Information System is designed to benefit multiple stakeholders, including the community, homeless service agencies, and the consumer of homeless services, through a more effective and efficient service delivery system.

II. Confidentiality

- A. The Agency will uphold relevant Federal and State confidentiality regulations and laws that protect client records, and the Agency will only release confidential client records with written consent by the client, or the client's guardian, unless otherwise provided for in the regulations or laws. A client is anyone who receives services from the Agency and a guardian is one legally in charge of the affairs of a minor or of a person deemed incompetent.
1. The Agency will abide specifically by Federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2, regarding disclosure of alcohol and/or drug abuse records. In general terms, the Federal regulation prohibits the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Agency understands that Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.
 2. The Agency will abide specifically with the Health Insurance Portability and Accountability Act of 1996 and corresponding regulations passed by the U.S. Department of Health and Human Services. In general, the regulations provide consumers with new rights to control the release of medical information, including advance consent for most disclosures of health information, the right to see a copy of health records, the right to request a correction to health records, the right to obtain documentation of disclosure of their health information, and the right to an explanation of their privacy rights and how information may be used or disclosed. The current regulation provides protection for paper, oral, and electronic information.
 3. The Agency will abide specifically by Pennsylvania State Law regarding substance abuse and medical records.
 4. The Agency will provide a written explanation of the Homeless Management Information System to all clients and will provide all forms in English.
 5. The Agency will not solicit or input information from clients into the Homeless Management Information System unless it is essential to provide services or conduct evaluation or research.
 6. The Agency will not divulge any confidential information received from the Homeless Management Information System to any organization or individuals without proper written consent by the client unless otherwise permitted by relevant regulations or laws.
 7. Secondary disclosure of client information is prohibited. Each agency must garner client consent prior to disclosure and may not disclose information entered by another agency.
 8. Printed records disclosed to the client or another party should indicate: the person and/or agency the record is directed, the date, and the initials of the person making the disclosure.
 9. The Agency will ensure that all persons who are issued a User Identification and Password to the Homeless Management Information System within that particular agency abide by this Partnership Agreement, including the confidentiality rules and regulations. The Agency will ensure that each person granted Homeless Management Information System access at the Agency receives a Homeless Management Information System operational manual. This manual will include information on how to use the Homeless Management

Information System as well as basic steps to ensure confidentiality. The Agency will be responsible for managing any of its own requirements that individual employees comply with Homeless Management Information System confidentiality practices, such as having employees sign a consent form stating their understanding of and Agreement to comply with Homeless Management Information System confidentiality practices.

10. The Agency is responsible for conducting a background check on its users and is charged with the responsibility of prohibiting users that do not meet the criterion as established in the Homeless Management Information System Operating Policies and Procedures. Employees must sign a confidentiality Agreement and attend confidentiality and/or privacy training prior to the issuance of user rights. Confidentiality and/or privacy training is required annually for each user. It is the responsibility of the Agency to provide its system administrator documentation of training on an annual basis.
 11. The Agency understands that the file server-which will contain all client information, including encrypted identifying client information-will be physically located at the offices of Bitfocus, Inc.
- B. The Agency agrees to maintain appropriate documentation of client consent or guardian provided consent to participate in the Homeless Management Information System.
1. The Agency understands that informed client consent is required before any basic identifying client information is entered in to the Homeless Management Information System for the purposes of interagency sharing of information. Informed client consent will be documented by completion of an authorization form and release of an information form developed by the Agency and approved by MCHHS OHCD.
 2. The authorization referenced above, once completed, authorizes basic identifying client data to be entered into the Homeless Management Information System, as well as non-confidential service transaction information. This authorization form permits basic client identifying information to be shared among all Partner Agencies and non-confidential service transactions with select Partner Agencies, based on relevance.
 3. If a client denies authorization to share basic identifying information and non-confidential service data via the Homeless Management Information System, the agency should use the anonymous client function.
- C. The Agency will incorporate a Homeless Management Information System clause into existing Agency Authorization for Release of Information Form(s) if the Agency intends to input and share confidential client data with Partner Agencies. The Agency's modified Authorization for Release of Information Form(s) will be used when offering a client the opportunity to input and share information with the Homeless Management Information System beyond basic identifying data and non-confidential service information. The Agency will communicate to the client what information, beyond basic identifying data and non-confidential services will be shared if client consent is given. The Agency will communicate to the client that while the Agency can restrict information to be shared with select agencies, those other agencies will have access to the information and are expected to use the information professionally and to adhere to the terms of the Homeless Management Information System Partnership Agreement. Agencies with whom information is shared are each responsible for obtaining appropriate consent before allowing further sharing of client records. MCHHS OHCD and/or its contractors will conduct periodic audits to enforce informed consent standards, but the primary oversight of this function is between agencies.

- D. If a client denies authorization to have information beyond basic identifying data and beyond non-confidential service transactions both entered and shared among the Homeless Management Information System, then this record must be locked and made available only to the entering agency program, therefore, precluding the ability to share information. A second option for agencies and clients when clients do not provide authorization to share data is to use the anonymous client function. If either of these choices is not selected, the Homeless Management Information System will not be used as a resource for information beyond basic identifying data and beyond non-confidential service transactions for that individual client and her/his dependents.
- E. The Agency agrees to place all Client Authorization and/or Release of Information forms related to the Homeless Management Information System in a file to be located at the Agency's business address and that such forms be made available to MCHHS OHCD and/or its contractors for periodic audits. The Agency will retain forms related to the Homeless Management Information System for a period of six (6) years, after which time the forms will be discarded in a manner that ensures client confidentiality is not compromised.
- F. The Agency understands that in order to update, edit, or print a client's record, the Agency must have on file a current authorization from the client as evidenced by a completed Agency form pertaining to basic identifying data.
- G. The Agency understands MCHHS OHCD does not require or imply that services be contingent upon a client's participation in the Homeless Management Information System.
- H. The Agency and MCHHS OHCD understand the Homeless Management Information System, MCHHS OHCD as administrator, and Bitfocus, Inc. are custodians of data and not owners of data.
 - 1. In the event the Homeless Management Information System ceases to exist, Partner Agencies will be notified and provided reasonable time to access and save client data on those served by the agency as well as statistical and frequency data from the entire system. Then, the information collected by the centralized server, located at Bitfocus, Inc. will be purged or stored. If the later occurs, the data will remain in an encrypted and aggregate state.
 - 2. In the event the County of Montgomery terminates its contract with Bitfocus, Inc., the custodianship of the data will be transferred to MCHHS OHCD or some other agency appointed by MCHHS OHCD, and all Partner Agencies will be informed in a timely manner.

III. Data Entry and/or Regular Use

- A. User identification and passwords are not permitted to be shared among users.
 - 1. Agencies with "Review Only" access are permitted to share account access internally to authorized agency members, with HMIS administrator consent.
- B. The Agency agrees to follow the operating policies and procedures as approved by the MCHHS OHCD HMIS Data Action Team.
- C. If an Agency has access to a client's basic identifying information, non-confidential service transactions, and confidential information and service records, it will be generally understood that a client gave consent for such access. However, before an agency can update, edit, or print such information, it must have informed client consent, evidenced by a current client authorization and/or release of information form in writing pertaining to basic identifying data and/or an Agency

modified form with a Homeless Management Information System Clause pertaining to confidential information.

- D. If a client has previously given permission to multiple agencies to have access to her/his information, beyond basic identifying information and non-confidential service transactions, and then chooses to eliminate one or more of these agencies, the Agency at which such desire is expressed will notify the partnering agency via electronic communication that the record will no longer be shared at the client's request. The Agency will then close the entire record, or simply lock out portions of the record to the other agency or agencies at the discretion of the originating agency. Partnering agencies understand that at no time should they penalize clients for requesting their information remain private.
- E. The Agency is responsible for setting the sharing parameters for files they enter and update.
- F. In the event that a client would like to rescind consent to participate in the Homeless Management Information System completely, the agency at which her/his desire is expressed, will work with the client to de-identify information in the client profile using the anonymous client function.
- G. The Agency will only enter individuals in the Homeless Management Information System that exist as clients under the Agency's jurisdiction.
- H. The Agency will not misrepresent its client base in the Homeless Management Information System by entering known, inaccurate information (i.e., Agency will not purposefully enter inaccurate information on a new record or to override information entered by another agency).
- I. The Agency will consistently enter information into the Homeless Management Information System and will strive for real-time, or close to real-time, data entry.
- J. The Agency understands that with a current client authorization form on file, it can update, edit, and print a client's basic identifying information.
- K. The agency understands that it must obtain a release of information to share confidential service transactions.
- L. The Agency understands that program assessments are only allowed to be edited by the individual that originally enters the data, whether that individual is employed by the Agency or another Partner Agency. The Agency will create a separate assessment, as needed to indicate a change in a client's status, update, and to edit incorrect information.
- M. Discriminatory comments based on race, ethnicity, religion, national origin, ancestry, disability, age, gender, and sexual orientation are not permitted in the Homeless Management Information System.
- N. Offensive language and profanity are not permitted in the Homeless Management Information System.
- O. The Agency will utilize the Homeless Management Information System for business purposes only.
- P. The Agency understands MCHHS OHCD and/or Bitfocus, Inc. will provide initial training and periodic updates to that training to assigned agency staff about the use of the Homeless Management Information System; this information is then to be communicated to other Homeless Management Information System staff within the Agency.

- Q. The Agency understands that MCHHS OHCD and/or Bitfocus, Inc. will be available for troubleshooting and report generation, within reason during normal business hours.
- R. The Agency will keep updated virus protection software on Agency computers that access the Homeless Management Information System.
- S. Transmission of material in violation of any United States Federal or State regulations is prohibited and includes, but is not limited to: copyrighted material, material legally judged to be threatening or obscene, and material considered protected by trade secret.
- T. The Agency will not use the Homeless Management Information System with intent to defraud the Federal, State, or local government, or an individual entity, or to conduct any illegal activity.
- U. The Agency recognizes the MCHHS OHCD HMIS Data Action Team to be the discussion center regarding the Homeless Management Information System, including process updates, policy and practice guidelines, data analysis, and software/hardware upgrades. The Agency will designate an assigned staff member to attend MCHHS OHCD HMIS Data Action Team meetings regularly, and understands that MCHHS OHCD will be responsible for coordinating MCHHS OHCD Data Action Team Data Action Team activities.

IV. Reports

- A. The Agency understands that it will retain access to all identifying and statistical data on the clients it serves. To clarify further, the Agency will have open access to all data and information originated by the Agency.

The Agency understands that access to data on those clients it does not serve will be limited to basic identifying information and non-confidential service data. Therefore, Agency understands that, with rare exception, a list of all persons in the Homeless Management Information System along with basic identifying information and non-confidential service data can be generated. An example of "rare exception" in which basic identifying information would not be available to all Partner Agencies is if the anonymous client function is used and identifiers such as name, DOB, and Social Security Number are not entered into the system. A second example would be if the basic identifying data and service transactions are locked to only the entering agency, in which case such information would be available only in aggregate form.

- B. Reports obtaining information beyond basic identifying data and non-confidential services on individuals not served by the Agency are limited to statistical and frequency reports, which do not disclose identifying information.
- C. The Agency understands that before non-identifying system wide aggregate information collected by the Homeless Management Information System is disseminated to non-Partner Agencies, including funders, it shall be endorsed by the MCHHS OHCD HMIS Data Action Team and MCHHS OHCD.

V. Proprietary Rights of Bitfocus, Inc. and Database Integrity

- A. The Agency will not give or share assigned user identification and passwords to access the Homeless Management Information System with any other organization, governmental entity, business, or individual.
- B. The Agency will not cause corruption of the Homeless Management Information System in any manner or way. Any unauthorized access, unauthorized modification to the computer system information, malicious software, or interference with normal system operations, whether on the equipment housed by Bitfocus, Inc. or MCHHS OHCD or any computer system or network accessed by either of them will result in immediate suspension of services and MCHHS OHCD and/or Bitfocus, Inc. will pursue all appropriate legal action.

VI. Hold Harmless

- A. MCHHS OHCD makes no warranties, expressed or implied. The Agency, at all times will indemnify and hold MCHHS OHCD harmless from any damages, liabilities, claims, and expenses that may be claimed against the Agency; or for injuries or damages to the Agency or another party arising from participation in the Homeless Management Information System; or arising from any acts, omissions, neglect, or fault of the Agency or its agents, employees, licensees, or clients; or arising from the Agency's failure to comply with laws, statues, ordinances, or regulations applicable to it or the conduct of its business. This Agency will also hold MCHHS OHCD harmless from negative repercussions resulting in the loss of data due to delays, non-deliveries, misdeliveries, or service interruption caused by the Agency's or another Partner Agency's negligence or errors or omissions, as well as natural disasters, technological difficulties, and/or acts of God. MCHHS OHCD shall not be liable to the Agency for damages, losses, or injuries to the Agency or another party other than if such is the result of gross negligence or willful misconduct of MCHHS OHCD.
- B. The Agency agrees to keep in force a comprehensive general liability insurance policy with combined single limit coverage of not less than five hundred thousand dollars (\$500,000) with MCHHS OHCD named as a certificate holder. Said insurance policy shall include coverage for theft or damage of the Agency's Homeless Management Information System related hardware and software, as well as coverage of the Agency's indemnification obligations under this Agreement. It is understood that units of government are self-insured and as such, by signing this Agreement, units of government agree to defend MCHHS OHCD against any action that arises as a result of their use of the system. If the insurance requirement poses an undue hardship to a non-profit wishing to participate, that Agency may apply for consideration directly to the Director of MCHHS OHCD.

VII. Terms and Conditions

- A. The parties hereto agree that this Agreement is the complete and exclusive statement of the Agreement between parties and supersedes all prior proposals and understandings, oral and written, relating to the subject matter of this Agreement.
- B. Neither party shall transfer or assign any rights or obligations without the written consent of the other party.
- C. This Agreement shall remain in force indefinitely. The exception to this term is if allegations or actual incidents arise regarding possible or actual breaches of this Agreement. Should such situations arise, MCHHS OHCD may immediately suspend access to the Homeless Management Information System until the allegations are resolved in order to protect the integrity of the system. If MCHHS OHCD determines that Agency breached this Agreement then MCHHS OHCD shall have the absolute right to terminate this Agreement. In the event that MCHHS OHCD terminates or suspends access to the Homeless Management Information System, then MCHHS OHCD shall have the absolute right to demand that Agency return the computer and printer, if provided by MCHHS OHCD, to MCHHS OHCD.
- D. This Agreement may be modified or amended by written Agreement executed by both parties with 30 days advance written notice.

By entering into this Partnership Agreement, the Agency agrees to follow all terms and conditions as set forth in the operating policies and procedures. Use of the Homeless Management Information System constitutes acceptance of these Terms and Conditions.

SIGNATURES ON NEXT PAGE

Montgomery County Health and Human Services,
Office of Housing and Community Development

By: _____

Witness

Title: _____

AGENCY

By: _____

Witness

Title: _____

Appendix B: User Authorization Form

Your Way Home Montgomery County Data Systems User Authorization Form

Agency Manager: Please complete this form to authorize a new user to the Clarity Human Services, Montgomery County’s HMIS. Once completed, email the signed form to HMISHelp@montgomerycountypa.gov

Agency Name: _____

Agency Manager Signature: _____

Date of Authorization: _____

The following individuals are authorized access to Clarity HMIS at the privilege level indicated.

Housing Resource Center/ Call Center only: Indicate if the user is also granted access to Dropbox files.

			Housing Resource Center/ Call Center Only:
User Name	Email	Clarity HMIS Privilege Level	YWH Dropbox

Clarity Privilege Levels:

- 1- Case worker: ability to create and edit client records, including referrals, and enroll clients in programs.
- 2- Agency manager: all abilities of case worker, plus ability to delete services and records at their agency.
- 3- Review only: view agency-level information and run reports.
- 4- Remove user: remove access from indicated databases.

Appendix C: User Agreement

Your Way Home Montgomery County / PA-504 Continuum of Care
Data Systems User Agreement

Agency Name: _____ Staff Name: _____

Your Way Home Montgomery County Data Systems, Clarity Human Services, and other accounts under the ownership of the Montgomery County Office of Housing and Community Development, collectively referred to as the YWH Data Systems, allow for client-level information storage and tracking to coordinate services between YWH partner agencies.

YWH Data Systems users (“Users”) have an ethical 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 Montgomery County HMIS Partnership Agreement and the Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual (“HMIS Policy and Procedures Manual”), and a clear understanding of client confidentiality are vital to achieving these goals.

Relevant points regarding client confidentiality include:

- A Release of Information form must be signed or verbal consent recorded for each client whose data is entered into the YWH Data Systems.
- No client may be denied services for failure to provide consent for data sharing in the YWH Data Systems.
- Clients have a right to inspect, receive a copy and request changes to their YWH Data Systems records.
- Users will maintain data within YWH Data Systems in such a way as to protect the identity of clients from nonparticipating agencies, individuals or entities.
- Any User failing to protect client confidentiality as set forth in this User Agreement, the Montgomery County HMIS Partnership Agreement, or the HMIS Policy and Procedures Manual, may be denied access to YWH Data Systems.

I have received and read a copy of the Montgomery County HMIS Partnership Agreement and the Your Way Home Montgomery County / PA-504 Continuum of Care HMIS Policy and Procedures Manual and affirm the following:

1. I have received YWH Data System Privacy and Security Training.
2. I have read and will abide by the terms of the Montgomery County HMIS Partnership Agreement and the HMIS Policy and Procedures Manual.
3. I will maintain the confidentiality of client data in YWH Data Systems as outlined above and as outlined in the Montgomery County HMIS Partnership Agreement and HMIS Policy and Procedures Manual.
4. I will properly collect, enter, update, and extract data in YWH Data Systems relevant to the delivery of services to homeless, at risk of becoming homeless, and formerly homeless people experiencing a crisis in our community in accordance with my training and the HMIS Policy and Procedures Manual.
5. I understand if these affirmations are not met, my access may be suspended or terminated.

 Staff signature

 Date

Appendix D: Data Systems Privacy Posting

Your Way Home Montgomery County /PA-504 Continuum of Care Data Systems Privacy Posting

This Agency is a Your Way Home partner agency. As a partner, this Agency participates in shared databases to coordinate services and send referral information to other partner agencies. These databases are called the Homeless Management Information System (HMIS), also referred to as the Your Way Home Data Systems. The goal of the Your Way Home Data Systems 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 personally-identifying information without recorded verbal and/or 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 program, you are giving consent for us to enter data about you into the Your Way Home data systems. Furthermore, if you request that we refer you to housing services from other Your Way Home partner agencies, you are giving consent to share your basic contact information for a referral to be made.

The collection and use of all personal information is guided by strict standards of confidentiality as outlined in our privacy policy. You may ask questions and/or request a copy of this policy from this agency at any time. You may also revoke your consent to share personally-identifying information at any time by contacting Your Way Home Program Manager Mikaela Lanford at 610-278-5144 or Mikaela.Lanford@montgomerycountypa.gov.

Appendix E: Release of Information

Your Way Home Montgomery County /PA-504 Continuum of Care Data Systems
Release of Information

For: _____ **Date of Birth:** _____
(Print First, Middle, Last Name)

Agency Name: _____

If you permit it, this agency may share limited information about you with other Your Way Home Montgomery County (YWH) agencies from who you may also seek services.

Please check (☐) a box:

- This agency may share my personally-identifying information within YWH Data Systems
- Please treat information about my children age 17 or younger the same as mine:

Names:

Please be aware that we may also share the following information:	
<ul style="list-style-type: none"> • Services you receive • Your income • Referral status for housing services 	<ul style="list-style-type: none"> • Military history • Living situation and housing history • Your housing plan

- This agency may not share my personally-identifying information within YWH Data Systems

When you sign this form, it shows that you understand the following:

- We will not deny you help if you do not want us to share your personally-identifying information.
- Persons with access to YWH Data Systems are trained in security protocols to protect your data and are only permitted to view your data when you are specifically working with their agency.
- If you request services from another YWH agency, your information will be shared for referral purposes only.
- YWH may conduct follow-up surveys with you for the purposes of research or to improve consumer experience. Your name and contact information may be used by YWH administrative staff, or shared with third-party researchers, for these purposes. Your name and contact information will never be shared publically without your explicit consent.

Signature of client or guardian

Date

Signature of agency representative

Date

Agency Use Only: YWH Code _____

Appendix F: Your Way Home Verbal Clarity HMIS Consent Statement

YWH Partner Agency Logo



YWH Verbal Consent Statement

Your Way Home Montgomery County collects basic intake data about you- and your household members age 17 and younger- to connect you to services and/or housing. These data include demographics and personally-identifying information such as:

- Name
- Address
- Social Security Number
- Date of Birth

Your Way Home's Homeless Management Information System is called Clarity Human Services. Persons with access to Clarity Human Services are trained in security, agree to maintain confidentiality, and are only allowed to view your data when you are working directly with their Agency, as required by state and federal laws.

Once you start working with an Agency, they will ask you for more information. Please note you are not obligated to release your personal information or participate in this data collection process to receive help. You may take back your consent at any time by calling us again.

Do you allow me to enter your information into the Clarity Human Services Database? Y/N