



Approved by the  
Homeless Solutions Policy Board:  
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## **Introduction**

The United States Department of Housing and Urban Development (HUD) requires that all Continuum of Care (CoC) groups receiving HUD grants install and utilize a Homeless Management Information System (HMIS) or similar database to collect data about clients served and the projects serving those clients. Federal requirements also dictate that all homeless projects receiving ESG, HOPWA or HHAP funding report client-level data into an HMIS. The only current exceptions to these requirements are projects specifically serving victims of domestic violence, and agencies that include serving victims of domestic violence as their primary purpose.

The OH-505 CoC utilizes an electronic data collection system that maintains client-level data about the individuals and families who receive homeless services throughout the community. The HMIS also assists agencies with program administration, operations, and reporting. HMIS can be used for many different functions including maintaining client and agency information, bed/unit availability, and service delivery. Some of the typical benefits of a data collection system such as the HMIS include:

- Improved service delivery and prompt referrals for clients
- Immediate access to important client information
- Quick and easy preparation of reports for funders, stakeholders

Victim Services Providers (VSP) are required to collect client-level data consistent with Homeless Management Information Systems (HMIS) data collection requirements. VAWA and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that limit Victim Service Providers from sharing, disclosing, or revealing victims' personally identifying information (PII), including entering information into shared databases like HMIS. To protect clients, VSPs must enter required client-level data into a comparable database that is comparable to and complies with all HMIS requirements, including the contents of the Data Quality Management Plan.

## **Data Quality**

Data quality is a term that refers to the reliability and validity of client-level data collected in the HMIS. It is measured by the extent to which the client data in the system reflects actual information in the real world. With good data quality, the CoC can "tell the story" of the population experiencing homelessness and measure system effectiveness.

A data quality plan is a community-level document that facilitates the ability of the CoC to achieve statistically valid and reliable data. A data quality plan sets expectations for the CoC, the HMIS Lead Agency and the end users to capture valid and reliable data on persons accessing the homeless assistance system throughout the community.

Developed by the HMIS Lead Agency and formally adopted by the CoC, the plan:

- Identifies the responsibilities of all parties within the CoC with respect to data quality;
- Establishes specific data quality benchmarks for timeliness, completeness, accuracy, and consistency;
- Describes the procedures for implementing the plan and monitoring progress toward meeting data quality benchmarks; and
- Establishes a timeframe for monitoring data quality on a regular basis.

## Roles and Responsibilities

Roles and Responsibilities are defined for the HMIS System Administrator, HMIS Site Administrator, and HMIS End Users.

### System Performance & Evaluation Committee

The System Performance & Evaluation Committee (SPEC) has two primary functions – to oversee and set policy for the CoC’s HMIS implementation and to monitor the progress of the CoC in meeting the locally established goals of the Homeless Solutions Plan, return on investment for programs in the homeless system, and HUD’s System Performance Measures. SPEC’s responsibilities include:

- Review trend data to establish performance targets
- Monitor performance targets to ensure the entire CoC system is functioning effectively
- Approve and monitor any agency HMIS quality improvement plans
- Establish HMIS Policies & Procedures
- Resolve HMIS Organization grievances that have not been resolved by the HMIS System Administrator

### HMIS System Administrator

The HMIS System Administrator is the primary HMIS contact and is responsible for the coordination and system-wide administration of the Dayton-Montgomery County HMIS. The System Administrator responsibilities include:

- Developing and delivering training for new end users and Agency Administrators
- Providing remedial or refresher training to end users
- Maintaining documentation of completed training requirements
- Authorizing/providing HMIS access or licenses to new end users
- Removing HMIS access or licenses due to violation or end of employment at the HMIS-participating agency
- Reviewing HMIS data standards updates for correctness and completeness
- Managing project set up tasks
- Providing troubleshooting/technical assistance via service desk activities
- Soliciting feedback from HMIS stakeholders on HMIS policies and operations

- Providing communications about upcoming agency-specific, CoC-wide, or HUD-mandated HMIS changes
- Documenting workflow needs by program
- Implementing program level workflow, features, and functionality
- Monitoring the HMIS vendor against the terms and conditions of the contract
- Reviewing HMIS software functionality updates for correctness and accuracy
- Testing new features and functionality
- Developing and running reports for the CoC and Contributing HMIS Organizations

### HMIS Site Administrator

The HMIS Site Administrator is the primary HMIS contact at the Contributing HMIS Organization. This person's responsibilities include:

- Providing a single point of communication between the Agency's end users and the HMIS System Administrator around HMIS issues
- Ensuring the stability of the Contributing HMIS Organization's connection to the Internet and ServicePoint, either directly or in communication with other technical professionals
- Providing support for the generation of Contributing HMIS Organization reports
- Managing Contributing HMIS Organization user licenses
- Running and reviewing data quality reports for accuracy and completeness by the 15<sup>th</sup> of each month
- Ensuring their agency's data is accurate and complete
- Ensuring compliance within their organization with standards of client confidentiality and ethical data collection, entry, retrieval, and end user rights and responsibilities

### HMIS End Users

The HMIS End User is the primary data collector and point of contact with the customer at each agency. The End Users primary HMIS responsibilities are:

- Collecting HUD assessment data from clients
- Entering HUD entry assessment data in HMIS
- Updating HMIS to reflect change in income, benefits, etc.
- Entering annual update data for clients who remain enrolled in their program more than 365 days
- Collecting HUD exit assessment data from clients (including exit destination)
- Entering HUD exit assessment data and exiting clients from projects in HMIS
- Securing paper forms according to privacy and confidentiality standards
- Maintaining workstation security

## Data Elements

HMIS data standards have been established by the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Health and Human Services (HHS), and the U.S. Department of Veterans Affairs (VA) to allow for standardized data collection on homeless individuals and families across systems.

The following data elements listed below are a subset of the HUD 2022 Data Standards, for a complete list of the most recent data standards please refer to:

<https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

### HUD Universal Data Elements

The Universal Data Elements establish the baseline data collection requirements for all homeless housing and/or service providers entering data into the HMIS. They are the basis for producing unduplicated information regarding the number of homeless people accessing services from homeless assistance providers, basic demographic characteristics of people who are homeless, and patterns of service use, including information on shelter stays and homelessness episodes over time.

For a complete list of the most recent data standards as stated by HUD can be found at <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>. The required Universal Data Elements include the following:

- Name
- Social Security Number
- Date of Birth
- Race
- Ethnicity
- Gender
- Veteran Status
- Disabling Condition
- Project Start Date
- Project Exit Date
- Destination
- Relationship to Head of Household
- Client Location
- Housing Move-In Date (applicable to all permanent housing project types)
- Living Situation

## Program Specific Data Elements

Common Data Elements provide information about the characteristics of clients, the services that are provided, and client outcomes. Many of these data elements represent information that may change over time.

- Income and Sources
- Non-Cash Benefits
- Health Insurance
- Physical Disability
- Developmental Disability
- Chronic Health Condition
- HIV/AIDS
- Mental Health Problem
- Substance Abuse
- Domestic Violence
- Contact (applicable to Street Outreach project types)
- Date of Engagement (applicable to Street Outreach project types)

## Individual Federal Partner Program Elements

Federal Partner Program Elements are elements maintained by one partner and shared with at least one other. When combined with the Universal Data Elements and Common Elements, these elements form the basis of data collection requirements for specific project level reporting generated by an HMIS. These elements are listed below by Federal Partner Program.

### HHS – PATH Program Elements

- Services Provided – PATH Funded
- Referrals Provided – PATH
- PATH Status
- Connection with SOAR

### RHY Program Elements

- Referral Source
- RHY:BCP Status
- Sexual Orientation
- Last Grade Completed
- School Status
- Employment Status
- General Health Status
- Dental Health Status
- Pregnancy Status
- Formerly a Ward of Child Welfare/Foster Care Agency
- Formerly a Ward of Juvenile Justice System
- Family Critical Issues
- RHY Service Connections

- Commercial Sexual Exploitation/Sex Trafficking
- Labor Trafficking
- Project Completion Status
- Counseling
- Safe and appropriate Exit

### VA Program Elements

- Veteran's Information
- Services Provided -SSVF (required for SSVF project types)
- Financial Assistance -SSVF (applicable to SSVF project types)
- Percent of AMI (SSVF Eligibility) -SSVF (applicable to SSVF project types)
- Last Permanent Address (applicable to SSVF project types)
- VAMC Station Number (applicable to SSVF project types)
- SSVF HP Targeting Criteria (applicable to SSVF HP project types)
- Connection with SOAR (applicable to SSVF project types)
- Last Grade Completed (applicable to SSVF project types)

### Timeliness

Entering data into the HMIS in a timely manner helps to reduce human error that can occur when too much time has elapsed between the time of data collection or provision of service and the time of data entry. Timely data entry also ensures that the data is accessible when it is needed, whether for monitoring purposes, meeting funding requirements, responding to requests for information, or for other purposes. All data shall be entered into HMIS in a timely manner. Toward that end, the following data entry deadlines are set forth:

- All HUD and locally required data elements data must be entered into the HMIS within two (2) working days of a CE assessment, residential intake, or shelter stay;
- Basic demographic data must be entered into the HMIS within two (2) working days of the first substantial outreach contact; and
- Exit data is to be entered into the HMIS within two (2) working days of the client exiting a program or within 7 days of the last St. Vincent's shelter stay.

### Completeness

Complete HMIS data is necessary to fully understand the demographic characteristics and service use of persons accessing the homeless housing services in the community. Complete data facilitates confident reporting and analysis on the nature and extent of homelessness. Complete data facilitates confident reporting and analysis on the nature and extent of homelessness, including:

- Unduplicated counts of persons served;
- Patterns of use of persons entering and exiting the homeless assistance system in the community; and
- Evaluation of the effectiveness of the community's homeless assistance system.

Complete HMIS data helps the CoC meet various funding compliance requirements and ensures that persons in the homeless assistance system receive the services needed to secure and maintain permanent housing. All projects using the HMIS shall enter data for one hundred percent (100%) of clients served, with the exception of those clients who do not consent to having their data entered into HMIS. The CoC recognizes that collecting 100% of all data elements (Universal and Program Specific) may not be possible in all cases. However, in order to ensure that the CoC meets HUD and other Federal Partner funding compliance requirements, and local reporting needs, the expectation is that blanks or unknown entries in required data fields will not exceed 5% during a reporting period.

## **Accuracy**

Accurate collection and entry of data into HMIS ensures that the data is the best possible representation of reality as it relates to homeless persons and the projects that provide homeless housing and services. All data entered into HMIS shall accurately reflect information provided by the client and as documented in the client's file, along with information known about the client and the housing and/or services received by the client. Changes or updates in client information shall be reflected in HMIS as they occur. Agencies must review data quality reports for accuracy and completeness by the 15<sup>th</sup> of each month.

## **How to Correct Data Quality Issues**

The following reports can help identify the majority of data quality issues:

- CoC-APR - Annual Performance Report
- Data Quality Framework
- Monthly Data Completeness Report Card
- Monitoring – Exits to Permanent Housing with Return
- St V Shelter Active Clients Report
- St V Shelter Monthly Report
- RHY Data Completeness-Quality Report
- SSVF Data Quality Report

HMIS Site Administrators should send any questions about the best way to correct data quality to the HMIS System Administrator.

## **Monitoring**

The purpose of monitoring is to ensure that the agreed-upon data quality targets are met to the greatest extent possible, and that any data quality issues are quickly identified and resolved. The CoC recognizes that the data produced from HMIS is critical to meet the reporting and compliance requirements of HUD, the individual agencies, and the CoC as a whole.



Monitoring and data quality and utilization rate reviews will be conducted as follows:

- Agencies will run and review data quality reports for accuracy and completeness by the 15<sup>th</sup> of each month.
- Any questions in running, reviewing, or correcting any data quality reports or errors should be addressed to the HMIS System Administrator
- Quarterly review of the data quality reports for all projects will be conducted by the HMIS system administrator in the month following each quarter
- HMIS System Administrator will conduct monitoring at least annually and will review Annual Performance Report (APR) data for accuracy and completeness.

When data quality benchmarks are met, reporting will be more reliable and can be used to evaluate service delivery, project design and effectiveness, and efficiency of the system. All HMIS participating agencies are expected to meet the data quality benchmarks described in this document. To achieve this, HMIS data will be monitored and reviewed in accordance with the schedule outlined in this section. All monitoring will be conducted by the HMIS System Administrator. (See Appendix A for an Agency HMIS Compliance Checklist.)

## **Data Quality Incentives, Enforcements, & Quality Improvement Plans**

A review of data quality will be on the System Performance & Evaluation Committee's agenda monthly and the CoC Governing Board's agenda quarterly. Providers with a high level of data quality will be acknowledged and noted as part of the CoC Governing Board's minutes.

The CoC will use HMIS data quality during the annual rank and review process for the CoC Competition.

If an agency is out of compliance with this Data Quality Management Plan or other HMIS Policies & Procedures, they may be required to work with the HMIS System Administrator to develop a quality improvement plan. All quality improvement plans will be reviewed, approved, and monitored by the System Performance & Evaluation Committee. The quality improvement plan may include HMIS refresher training for all agency HMIS users and technical assistance to the agency's HMIS Administrator. If the data quality issues are not resolved, SPEC may request a meeting with the agency director. Continued noncompliance may result in the agency losing access to HMIS.

## Appendix A: Agency HMIS Compliance Checklist

<b>Agency:</b>	<b>Date:</b>		
<b>Compliance Standard</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
The agency has a process that verifies that Client Consent forms were obtained. Relevant documentation is available for review.			
Agency has designated at least one person as their HMIS Site Administrator. This is the person who is the point of contact with the HMIS System Administrator for technical assistance requests and training issues.			
Agency collects and enters all HUD required Data Elements into the HMIS.			
All agency staff know what data they need to collect and how to correctly code client records to reflect the collected data?			
Client data collected in the HMIS accurately represents the case characteristics, demographics, service transactions, and history.			
The agency's participating programs collect and enter data on 100% of clients served (excluding DV programs or clients that refused).			
Agency maintains a minimum of 95% completeness for all required data fields (blanks or unknown entries will not exceed 5%)			
Agency accurately enters all client data, including Program entry, exit, and services as close to real time as possible			
Agency reviews data quality reports for accuracy and completeness			
Agency ensures that all computers accessing the HMIS are private and secure.			
Agency limits access to information provided by the HMIS database to authorized employees/volunteers only.			
All staff entering/viewing HMIS data in Service Point have a unique user name/password and maintain a secure workstation.			
All staff with Service Point user names/passwords have a signed User Confidentiality and Responsibility Agreement on file at the Agency.			
All staff entering/viewing HMIS data in Service Point have been adequately trained to collect, enter, and extract data			
The HMIS Site Administrator is immediately notified when an employee leaves so that their HMIS user account can be deleted.			
The Agency regularly updates virus and firewall protections on computers that enter/access HMIS data.			
Hard copy data from the HMIS is secured.			
Agency has a posted data privacy notice at intake (or comparable location) with general reasons for data collection.			