MA-503 CAPE COD AND ISLANDS CoC – HMIS FAQs

Is participation in HMIS available to Continuum of Care programs only?

No, while CoCs are required to use HMIS, any community homeless service provider may participate in HMIS. All HMIS users must comply with data collection requirements and data privacy and confidentiality standards.

What type of data does HMIS collect?

Homeless service providers must submit Universal Data Elements (UDEs) for all persons enrolled in homeless service programs. The FY2022 HUD HMID Data Standards include the following UDEs: Name, Social Security Number, Date of Birth, Race, Ethnicity, Gender, Veteran Status, Disabling Condition, Project Start Date, Project End Date, Destination, Relationship to Head of Household, Client Location, Housing Move-in Date, and Prior Living Situation. In addition, CoC funded projects are required to submit information on program-specific data elements for each client served: Income, Non-Cash Benefits, Health Insurance, Physical Disability, Chronic Health Condition, Developmental Disability, HIV/AIDS, Mental Health, Substance Use, and Domestic Violence.

Why is this data collected?

HMIS generates unduplicated counts of clients served and is designed to capture information over time (i.e., longitudinal data) about those persons moving in and out of the homeless assistance system, including changes in residential status, family composition, and service use. HMIS provides the most accurate picture of the extent and nature of homelessness within a community by identifying how many people are homeless in shelters and on the street, how many people are chronically or episodically homeless, what the characteristics and service needs of those served are, and which programs are most effective at reducing and ending homelessness.

Who "owns" the data in HMIS?

At the most basic level, clients own their personal data. However, when a client seeks assistance from a service provider, the service provider's privacy policy governs the transfer of this ownership. The MA-503 CoC's HMIS Policies and Procedures detail what will be done with the collected data and the client must consent to this policy. Generally speaking, client information may be shared with other HMIS participating agencies in order to facilitate more efficient service delivery for the client throughout the homeless services system.

How is client data protected in HMIS?

The two central concepts of protection of client data are *data privacy* and *data security*. *Data privacy* refers to how *personal identifiable information* (PII) is collected and stored, how it is shared with third parties, and how regulatory restrictions apply to the handling of PII in the HMIS. *Data security* is the process of safeguarding files in the HMIS through the use of controls, applications, and techniques that secure the data, protect it from unauthorized users, and ensure that data remains complete, accurate, intact, and available to authorized users. The US Department of Housing and Community Development (HUD), which administers the CoC program, has set strict regulatory requirements for the collection, storage, sharing, and safeguarding of client level data entered into HMIS. MA-503 Cape Cod and Islands CoC has incorporated, implemented, and updated these federal mandates into the HMIS Data Security Plan as part of its HMIS Policies and Procedures.

Is the CoC's HMIS an open or closed system?

MA-503 uses an open system, meaning that certain client data is shared across all participating agencies. This type of limited data sharing enables users to avoid duplicating clients in the system and to coordinate services across agencies.

What does Data Quality mean?

Data quality refers to the reliability and validity of client-level data collected in the HMIS and is measured by how closely data in the system reflects actual information in the real world. No data collection system has a quality rating of 100%, but it is critical that the HMIS have the best possible information about persons experiencing homeless and the projects that serve them. The goal is to record the most accurate, consistent, and timely information in order to draw reasonable conclusions about the extent of homelessness and the impact on the homeless service system. The Cape Cod and Islands CoC has incorporated a detailed Data Quality plan into its HMIS Policies and Procedures.

Do data entry staff have to verify that the information clients give matches their legal documents?

For HMIS, no. You are not required to verify that the information provided matches legal documents. However, each project should be aware of funders' recordkeeping requirements for eligibility, and if maintaining copies of legal documents is a requirement, they should be collected and the information updated in HMIS accordingly.

What happens if a client doesn't want to answer a question?

While HUD expects users of HMIS to encourage full data collection, if a client can't or won't offer the requested data, those responses can be noted with "Client doesn't know" or "Client refused". No client can be refused services for not providing complete information, regardless of the type of missing information.

Are CoCs required to use their HMIS in their coordinated entry process?

Yes, as of October 1, 2020, HUD has required CoCs to implement their CE programs into HMIS and to collect certain CE Data Elements: Coordinated Entry Assessment, Coordinated Entry Event, and Current Living Situation. MA-503 CoC utilizes a single, system-wide CE project into which all Access Points (participating agencies that conduct client vulnerability assessments) contribute data. Additionally, CoCs are expected to generate the CE Annual Performance Review (APR) through HMIS.

What are the HMIS participation requirements for victim services providers?

Victim services providers (VSP) that are recipients or subrecipients under the CoC Program are required to collect client-level data consistent with HMIS data collection requirements, BUT they must **not** directly enter data into an HMIS. To protect clients, victim services providers must enter required client-level data into a comparable database that complies with HMIS requirements. They may use CoC Program funds to establish and operate a comparable database. Information entered into a comparable database must not be entered directly into or provided to an HMIS. Victim services providers MUST provide aggregate data to the CoC for reporting purposes.