

**Homeless Continuum of Care of Stark County**

**Board of Directors Meeting**

**May 12, 2015**

**9:30 am at the Sisters of Charity Foundation**

**MEMBERS PRESENT**

John Aller

Vicki Conley

Lynne Dragomier

Amanda Fletcher

Maria Heege

Beverly Jordan

Dave Kaminski

Natalie McCleskey

Jeff Shultz

Shirene Starn-Tapyrik

Jean Van Ness

**ABSENT**

Lisa Miller

**EXCUSED**

Mike Cody

Tim Corbi

Cathy Jennings

Beth Pearson

Kelly Perry

Nedra Petro

**SOCF STAFF**

Shannon Williams

**I. Welcome/Conflict of Interest Reminder/Approval of April Minutes**

At 9:33 a.m., Jean called the meeting to order, welcomed everyone, and reminded everyone of the Conflict of Interest policy.

**Motion:** Jean requested a motion to approve the April Board meeting minutes, which had been distributed to the Board via email prior to the meeting. Dave made the motion, Jeff seconded, and the motion passed unanimously.

**II. Discussion and Vote to Approve Recommendations of HMIS Committee of Policy Changes**

In keeping with HCCSC's plan to review and update its policies and procedures annually, the HMIS Committee has begun revising the HMIS policies (Governance Charter documents E.1 through E.6). The policies amended to date (E.1: HCCSC HMIS Policy and E.2: Agency Partner Agreement) were distributed to the Board via email prior to the meeting (see Appendix A). In the absence of Matt Hudas, HMIS Committee Chair, Shannon presented to the Board (1) the committee's revision process, (2) the superficial changes made to the policies, and (3) the substantive changes made to the policies. The Board discussed the changes. Jean noted one inconsistency between the documents and proposed a minor but necessary change to E.2 to resolve it.

**Motion:** Lynne moved to approve the amended E.1: HCCSC HMIS Policy and E.2: Agency Partner Agreement with the discussed change to E.2. Shirene seconded the motion, and it was approved by all except John, who abstained.

**III. Discussion and Vote to Approve Recommendations of Recipient Approval and Evaluation Committee**

Shirene and Amanda left the room at this point.

Documents entitled “Recommendations of the Recipient Approval and Evaluation Committee” and “Recipient Approval and Evaluation Committee: Factors considered on Recommended Re-Allocations for 2015 CoC Application” were distributed via email to the Board prior to the meeting (see Appendix B).

#### **A. CoC Funding**

During its deliberations about the committee’s recommendation and considerations (outlined in the aforementioned documents), the Board reflected on:

- The general trend among CoCs to defund transitional housing programs and reallocate CoC funding to rapid re-housing
- The need to find a different intervention (possibly rapid re-housing) to fill the gap left by transitional housing, if the funds for the HCCSC’s two remaining CoC-funded transitional housing programs are reallocated
- The discussions that Jean and Natalie have held thus far with YWCA and Alliance for Children and Families about the possible reallocation of their transitional housing funding

**Motion:** Vicki moved to approve the Recipient Approval and Evaluation Committee’s recommendations for reallocation of CoC funding as presented in the document “Recommendations of the Recipient Approval and Evaluation Committee” (in Appendix B). Lynne seconded the motion.

**Discussion:** Discussion followed about how and by whom the new uses for the reallocated funds will be identified. Jean reminded the Board that the revised “Procedures for Inviting and Reviewing Applications for CoC Funding” (which were approved by the Board in an email vote after its April meeting) explain how the funds will be made available for the new projects that fit the identified need.

**Vote:** Jean requested the final vote, and the motion to approve the Recipient Approval and Evaluation Committee’s recommendations for reallocation of CoC funding passed unanimously.

#### **1. Discussion and Vote on Procedure to Determine Types of Projects for Which Reallocated Funds Can be Used**

The Board then discussed how to determine which types of projects should receive the reallocated funds, considering whether it should (a) designate authority to the System Performance Committee to decide which types of projects ought to receive the funds or (b) request a recommendation about which types of projects ought to receive the funds from the committee to be voted on by the Board. Jean shared that, at its next meeting (May 19), the System Performance Committee plans to examine recent data in order to formulate a recommendation and has invited providers to attend and participate in the discussion.

**Motion:** Jeff moved to request a recommendation from the System Performance Committee regarding what types of projects ought to receive the reallocated funds and to submit that recommendation to an email vote by the Board. Bev seconded the motion and it passed unanimously.

## **2. Discussion and Vote on Procedure to Approve New Project Applications**

Next, the Board discussed how to decide which new projects will receive the reallocated funds.

**Motion:** John moved to conduct email votes by the Board, if necessary, of the Recipient Approval and Evaluation Committee's recommendations regarding any new applications for the reallocated CoC funding that align with the Board's approved priorities before the next Board meeting. Maria seconded the motion and it passed unanimously.

John left the room at this time.

### **B. Emergency Solutions Grant (ESG) Funding**

By regulation, the City of Canton, as a recipient of Emergency Solutions Grant (ESG) funds and the HCCSC, as the Continuum of Care for the geographic area that includes the City of Canton must consult about plans for using ESG funds. To fulfill this mandate, the City of Canton has entered into a contract with the Stark County Regional Planning Commission (SCRPC) as Collaborative Applicant for the HCCSC which specifies that the SPCRC, with the help of the HCCSC's Recipient Approval and Evaluation Committee, will review applications for the city's ESG funds and, with HCCSC Board approval, recommend which of those applications will be funded. While reviewing the Recipient Approval and Evaluation Committee's recommendations for funding applications submitted for 2015 ESG funds, the Board discussed the fact that, if the City accepts the committee's recommendations, it will still have \$89,000 left to spend. Therefore, the HCCSC will have to provide additional recommendations for how that money should be spent

**Motion:** Maria moved (1) to approve the Recipient Approval and Evaluation Committee's recommendations to the City of Canton regarding the funding of ESG applications as presented in the document "Recommendations of the Recipient Approval and Evaluation Committee" (in Appendix B) and (2) to conduct an email vote of the Board to approve the System Performance Committee's recommendations for use of the remaining ESG funds.. Vicki seconded the motion and it passed unanimously.

Shirene, Amanda, and John returned to the meeting at this point.

## **IV. Review and Discussion of Point-in-Time (PIT) Count and Waiting List Data**

The Board received a document that compares the 2015 PIT data (including households with and without children, veteran households, youth households, and chronically homeless) with the same data from 2013 and 2014. This was distributed to the Board via email prior to the meeting.

Bev Jordan left the meeting at this point.

While reviewing the document, the Board discussed the following:

- With the leadership of Lisa Waikem at ICAN, HCCSC may successfully house all homeless veterans in Stark County by summer. The Veterans Task Force will focus on the needs for ongoing funding and supportive services for the projects created to house these veterans.
- Verification of chronic homelessness remains a challenge for HCCSC. Currently, individuals are ranked on the central wait list according to their self-identification as chronically homeless during their HMIS intake call, but there is little capacity to verify their chronic homeless status. Street outreach programs could play a significant role in verifying this information.

Dave Kaminski left the meeting at this point.

Jean asked the Board to consider inviting Jennifer to the next meeting. The Board requested that, if she is able to attend, she address (1) the challenges that the Hotline and providers face while attempting to place clients in shelter, and (2) the reasons that individuals remain unsheltered.

## **V. Questions/Comment on Board Updates**

### **A. Community Meeting to Discuss the Future of HCCSC**

On April 22, Jean, Vicki, and Lynne spoke with Katie Kitchin from Corporation for Supportive Housing (CSH) about plans for a community summit to discuss the future of HCCSC, as well as strategies that HCCSC could adopt to ensure its sustainability in the future (notes on the conference call were provided in the Board Updates Appendix A, provided to the Board via email prior to the meeting). They will continue to share any developments in these conversations with the Board. They requested that Board members examine relevant community calendars, as well as their own, for potential conflicts with the proposed dates for the summit in September: September 8, 9, 10, and 14.

## **VI. Old Business**

The Board had no old business to discuss.

## **VII. New Business**

### **A. Chamber of Commerce Discussion Group**

Along with other social service agency representatives and local safety officials, representatives from the Mental Health and Recovery Services Board were invited to a group discussion held by the Chamber of Commerce on panhandling in the county.

## **B. Alliance City Council Ordinance**

Alliance City Council recently attempted to pass an ordinance under which owners of rental properties could be fined for any public nuisance that occurs on the properties they own. Shirene announced that she will go to the council meeting on Monday, May 18 to voice her concerns as a property owner for CoC-funded properties.

## **C. New Mental Health Projects**

Quest is opening a five-bed facility for women who are transitioning out of residential facilities. In addition, Coleman's new project includes four houses with 11-bed for individuals with serious mental illness or disorders.

## **VIII. Adjournment**

There being no further business, the meeting was adjourned at 11:34am.

## **HOMELESS CONTINUUM OF CARE OF STARK COUNTY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) POLICY**

**PURPOSE:** Enhance the ability to collect accurate data and to provide guidance for the efficient administration, implementation, and maintenance of the HMIS system that meets HUD requirements.

The Homeless Continuum of Care of Stark County (hereinafter HCCSC) recognizes that Client needs must drive the HMIS design and management. The HCCSC will use the HMIS to pursue its goals to eliminate homelessness in our community and to improve the quality of homeless and housing services.

As the guardians entrusted with this personal data, HMIS Users have a moral and a legal obligation to ensure that the data they collect is accessed and used appropriately. Each User is responsible to ensure that Client data is only used to accomplish the HCCSC goals. Users must ensure Clients understand how the data will be used and that the data use is consistent with the mission to assist families and individuals resolve their housing crises.

Proper user training, adherence to the HMIS Policies and Procedures Manual, and a clear understanding of Client confidentiality are vital to achieving these goals.

### **SECTION I ROLES AND RESPONSIBILITIES**

**Policy:** The HCCSC is responsible for developing and adopting HMIS policy and monitoring compliance with HMIS policies. The HMIS Administrator will monitor HMIS level data collection and HMIS main system data entry. The HMIS Administrator is also responsible for generating aggregated data reports. All policies and procedures will comply with HUD requirements. The HMIS Administrator may designate others to fulfill these functions as s/he determines.

#### **1.01 Lead HMIS Agency**

**Procedure:**

1. The Lead HMIS Agency shall be appointed by the HCCSC and will enter into a Memorandum of Agreement (MOA) with the HCCSC.
2. The HMIS Administrator shall be an employee of the Lead HMIS Agency.

#### **1.02 HCCSC HMIS Committee**

**Policy:** HCCSC HMIS Committee (hereinafter HMIS Committee) drafts new procedures, reviews existing procedures, reviews problems raised during implementation of existing policies, and makes recommendations on policies to adopt or change.

The HMIS Committee will include, but is not limited to:

- An HCCSC representative;
- HMIS Administrator;
- HMIS Participating Agencies;
- key stakeholders;
- and where possible, persons with knowledge or expertise in data design, collection, and systems administration.

**Procedure:**

HCCSC will maintain an HMIS Committee to guide the administration of HMIS policy and monitor provider compliance.

1. HCCSC will assemble an HMIS Committee and appoint the chair(s).
2. HMIS Committee will meet on a routine basis as defined by the Committee to review and recommend HMIS policies, plan for training, troubleshoot system problems, monitor secure software access, and provide feedback to the HMIS Administrator and HMIS Participating Agencies.
3. HMIS Committee will revise or create policies as needed and will forward them to HCCSC for final approval.
4. The Committee will oversee protocols and assist with HMIS CoC issues.
5. The HMIS Committee will develop and review policies for customized data reports (including frequency, notice, level of customization, allowable data, and other related items) and recommend a cost structure for additional non-mandatory reports as requested by HCCSC.
6. HMIS Committee will oversee data reports on Participating Agencies to monitor data quality.
7. The HMIS Committee may form an HMIS Advisory Group with the explicit purpose of resolving any specific issue(s). After issue(s) has/have been resolved Group may be dissolved. The Advisory Group will include users and facilitators with technical expertise.

### **1.03 HMIS Staff**

**Procedure:**

1. The HMIS Administrator or designee will coordinate and administer the HMIS including data collection, data entry of primary HMIS data, connectivity, and reporting of compliance or other data issues.
2. The Administrator will keep a list of all agencies (i.e., Participating Agencies) and agency staff (i.e., HMIS Users) authorized to use the HMIS.

#### **1.04 HMIS Administrator**

**Procedure:**

1. The HMIS Administrator has access to retrieve all data in the HMIS and will facilitate retrieving individual records of multiple social service programs, primarily those that serve the homeless.
2. The HMIS Administrator will provide aggregate data reports to all authorized requestors and Client-specific reports to each Agency regarding their own data.

## **SECTION II PARTICIPATING AGENCIES**

#### **2.01 Participating Agencies - Agency Administrators**

**Procedure:**

1. Each Participating Agency will designate an HMIS Agency Administrator who will serve as the primary liaison with the HMIS Administrator and who will be responsible for monitoring agency compliance and data quality. Each Participating Agency must have a designated HMIS Agency Administrator at all times. If no administrator has been appointed to the HMIS Administrator, the Agency's Executive Director (or Chief Executive Officer) shall serve as the Agency Administrator.
2. The Agency Administrator will be the primary contact person and provide their contact information to the HMIS Administrator and the HMIS Committee, including changes such as replacement contact information or changes in contact names, addresses or numbers.
3. The HMIS Agency Administrator (or other empowered officer) of Participating Agencies will sign an HMIS Agency Partner Agreement.

#### **2.02 Participating Agencies**

**Procedure:**

1. Any agency participating in the HMIS will abide by all Policies and Procedures outlined herein.
2. Participating Agencies shall designate who will have access to the HMIS in their respective agencies (i.e., their HMIS Users).
3. Participating Agencies will conduct a background check on each of their designated HMIS Users and will take all necessary steps to ensure that the designated users understand and abide by HMIS Policies as stated herein.
4. Participating Agencies that are noncompliant with HMIS Policies may lose the right to access HMIS directly. They may also be billed for expenses incurred by the HMIS Administrator for entering and/or retrieving data on their respective Agency's behalf.
5. Participating Agencies shall inform the HMIS Administrator in writing within one business day of changes in the Agency's authorization of HMIS Users.

### **2.03 Participating Agency Hardware/Software Requirements**

#### **Procedure:**

1. Connection to the HMIS requires a broadband connection approved by the HMIS Administrator or designee.
2. Operating software must meet the specifications required by the HMIS Software Vendor.

### **2.04 Participating Agency Technical Support Requirements**

#### **Procedure:**

Participating Agencies are responsible for providing their own technical support for all hardware and software systems used to connect to the HMIS. Agencies are responsible for maintaining connectivity to the HMIS.

### **2.05 HMIS Users**

#### **Procedure:**

1. Each Participating Agency staff member who has access to the HMIS (i.e., HMIS User) will sign an End User Agreement authorizing her/his use of the HMIS.
2. Only staff members authorized by the HMIS Agency Administrator as HMIS Users have the right to access the HMIS.
3. The right to use the HMIS terminates when a staff member identified as an HMIS User leaves the Participating Agency for any reason, or changes positions where use of the HMIS is no longer part of the staff member's responsibilities.

4. HMIS Users will need a Client's written permission to share Client data with individuals or agencies that have not entered into an HMIS Agency Partner Agreement. A standard permission form will be available to all agencies. Third party entities will be responsible for signing a Business Associate Agreement (BAA).
5. HMIS Users may not share individual Client data with any agency that is not specified in the HMIS universal consent documents (See E.3 Attachment A) without obtaining written permission from the Client.
6. HMIS Users will maintain HMIS data in such a way as to protect against revealing the identity of Clients to unauthorized agencies, individuals, or entities.
7. Any HMIS User found to be in violation of the HMIS Policies and Procedures, or the points of Client confidentiality in the User Agreement, may be denied access to the HMIS.

## **2.06 HMIS User Access Levels**

### **Procedure:**

The HMIS Committee will rely on the HMIS Administrator's recommendations to determine HMIS security levels. Agency Administrators are responsible for determining appropriate levels of access to the HMIS data for each of their users.

## **2.07 Communication with Participating Agencies**

### **Procedure:**

1. Each Participating Agency shall appoint one primary contact for all global communications.
2. The HMIS Administrator or designee may contact either the HMIS Agency Administrator or User directly to discuss data discrepancies or to respond to a request for assistance with a specific issue or problem.
3. Participating Agencies will report problems to the HMIS Administrator. If the issue is not resolved, the Agency may seek resolution from the HMIS Committee. Final resolution may be solicited from HCCSC after all other options have been exhausted.

## **2.08 System Availability**

### **Procedure:**

1. Participating Agencies will promptly report HMIS system problems to the HMIS Administrator.

2. The HMIS Administrator will contact the Approved Software Vendor to deal with systems issues.
3. The HMIS Administrator will inform Participating Agencies in advance of any planned interruption in service and will communicate details and remedies when unplanned interruptions occur.
4. In the event the Approved Software is not available, Participating Agencies will collect data manually until it is reconnected and can enter the information into the system.

### **2.09 User Licenses**

#### **Procedure:**

Participating Agencies may be allowed additional User licenses with approval from the HMIS Administrator provided that the need to add Users is consistent with the Purpose Statement of this Policy as stated herein. Cost of additional User licenses may be passed on to the requesting Agency.

### **2.10 User Activation**

#### **Procedure:**

Each new User will be issued a username and password to access the HMIS. Permission is granted after the new User has had data entry training and has signed the HMIS User Agreement.

### **2.11 Training**

#### **Procedure:**

The HMIS Administrator or designee is responsible for providing the initial HMIS training. Participating Agencies that have frequent changes in Users may be charged for additional trainings.

## **SECTION III DATA COLLECTION**

### **3.01 Required Data Collection**

**Policy:** Data is collected and maintained for the limited purposes of:

- Complying with HUD data requirements;
- evaluating compliance with HUD data requirements;
- supporting and optimizing the delivery of homeless services;
- assisting with community needs assessments;
- documenting needs in grant/funding requests;
- advocating to address need;
- and educating the public about the community's homelessness and the need for housing and services.

**Procedure:**

1. All HCCSC service providers shall collect all HUD, State, County, City, HCCSC, or other funder required Client data.
2. The required data elements are specified in the HMIS database.
3. Participating Agencies shall provide and/or enter into the HMIS the required set of data variables for each Client. The HMIS Administrator shall designate an individual or other Participating Agency to enter the required data on behalf of those Participating Agencies that do not do direct data entry.

### **3.02 Appropriate Data Collection**

**Procedure:**

HMIS Users may collect additional data relevant to the delivery of services.

### **3.03 Data Integrity**

**Procedure:**

All HMIS Users are responsible for the accuracy, timeliness and completeness of their data entry.

### **3.04 Data Integrity Expectations**

**Procedure:**

All Users are expected to exercise diligence in gathering and entering data. All Users who have repeated data entry problems will receive additional training. Chronic problems may be reported to the HMIS Committee. If problems are unresolved, problems may be elevated to the HCCSC Board. (HCCSC policy E.6).

### **3.05 Data Corrections**

**Procedure:**

1. Each Participating Agency that reviews individual level data shall assist in confirming HMIS information is accurate and up-to-date, based on information gained through direct contact with Clients and review documents such as driver's license, social security card, birth certificate, attendance records, or other credible documents.
2. Participating Agencies shall report data errors to the HMIS Administrator within five working days of finding an error.
3. Within five working days of receipt, the HMIS User at the Participating Agency will either correct the error or provide supporting documentation. HMIS Administrator will have final decision-making authority.

**3.06 Data Element Customization****Procedure:**

1. The HMIS Software does not allow for agency-specific customization of Client data fields. Agency-specific customization is available for agency program information.
2. Agencies may submit a request for modification of the HMIS software to the HMIS Administrator. The decision to make a modification will consider the benefit to all HMIS Users, cost, how the modification will be paid for, and agreement by the Software Provider. The HMIS Administrator will inform HMIS Committee about modifications but does not need its authority to make the change.

**3.07 On-Site Review****Procedure:**

The HMIS Administrator will perform annual on-site reviews of data processes related to the HMIS at Participating Agency sites. Participating Agencies may be charged for costs of additional reviews needed to resolve chronic problems.

**3.08 Data Outcomes****Procedure:**

Outcomes performance reports are provided to the appropriate committees by the HMIS administrator.

## SECTION IV ACCESS TO HMIS

### 4.01 User Access

#### Procedure:

1. The HMIS Administrator creates and assigns all initial usernames and passwords.
2. HMIS database usernames and passwords shall be unique and may not be shared or exchanged with other Users, unless authorized by the HMIS Administrator.
3. Only the HMIS Administrator or designee will have access to the list of HMIS database usernames.

### 4.02 Passwords

#### Procedure:

1. Each HMIS User will have a separate username and password for the HMIS database. This is not permitted to be shared or exchanged with any other users, unless authorized by the HMIS Administrator.
2. All Participating Agencies and Users shall keep both HMIS server and HMIS database passwords confidential, and protect the passwords by storing them in a safe place. They may not be shared with any other User, including other Users within the same agency.
3. Neither the HMIS Administrator nor designee will have access to passwords after passwords are initially created.
4. The HMIS Administrator will determine when and how often passwords will be reset.

### 4.03 Data Access Location

#### Procedure:

The HMIS Administrator will exercise the necessary precautions and care to protect Client data confidentiality, follow all security policies in the HMIS Policies and Procedures Manual and adhere to the standards of ethical data use, regardless of the location of the connecting computer.

### 4.04 Data Requests

#### Procedure:

1. Requests for data shall be made to the HMIS Administrator in writing and will include the date of the request, who is making the request, when the data is needed, the purpose for the request, and if applicable, a copy of the Client Release.
2. Routine requests shall allow a reasonable time for response.
3. Emergency requests (e.g. discovery of error) will receive priority. Requestor should indicate preferred response time.

## **SECTION V DATA ACCESS**

### **5.01 Inter-Agency Data Sharing and Access Rights**

**Procedure:**

1. Data included in the main profiles of the Client (first entered when Clients are new) and Client event (case) will be available in read-only access to all Users. The HMIS User(s) entering Client profile information and establishing the case will have editing access to the data. Data change requests require HMIS Agency Administrator approval.
2. All Program and service level data can only be entered or amended by HMIS staff and/or the Participating Agency.

### **5.02 Access to Core Database**

**Policy:** Access to the database will be limited in order to protect the information within it and to protect the privacy of Clients.

**Procedure:**

1. Only authorized HMIS Users and the Approved Software Vendor will have direct access to the HMIS database. No one will have direct access to the HMIS database through any means other than the Approved Software, unless explicitly given permission by the HMIS Administrator or designee during a process of software upgrade or conversion.
2. Use of HMIS data must be consistent with the Purpose Statement of this Policy as stated herein.
3. The Approved Software Vendor will provide access monitoring and will employ security methods to prevent unauthorized database access.

### **5.03 Data Retrieval**

**Procedure:**

1. HMIS Users will maintain the security of any Client data extracted from the database and stored locally as required by federal and state regulations, including all data used in custom reporting.
2. The HMIS Administrator or his/her designee may supply the Participating Agencies with specialized agency-level reports.

### **5.04 Participating Agencies**

**Procedure:**

1. Participating Agencies will have access to retrieve any individual and aggregate data entered by their own programs.
2. Participating Agencies may view individual Client's records entered by other Agencies only with the Client in question's written consent.

### **5.05 HMIS Software Vendor**

**Procedure:**

1. The HMIS Software Vendor will not access individual or aggregate data contained within the HMIS, except in specific limited instances to correct system errors and/or inconsistencies. This excludes random viewing of records that may occur during troubleshooting or problem solving of software problems.
2. The HMIS Software Vendor or other software maintenance person will not require permission from the HMIS Committee to perform software maintenance, troubleshooting, and/or data conversion of the HMIS.

### **5.06 Client**

**Procedure:**

Clients who file a written, signed request to the HMIS Administrator to see their HMIS records will receive a printed copy of their records within five working days.

## 5.07 Public

### Procedure:

Upon formal request, the HMIS Administrator will provide aggregate data information to appropriate agencies or bodies for acceptable use such as community planning, problem analysis, needs assessment, grant applications, and research.

## SECTION VI CLIENT CONFIDENTIALITY

### 6.01 Ethical Data Use

#### Procedure:

1. Confidentiality principles are identified in the Privacy Notice for the HCCSC and its participating organizations:
  - a) Client information, obtained in the course of professional service, should be protected unless there is a compelling reason to disclose it. Disclosure may be necessary to prevent serious, foreseeable, and imminent harm to a Client or other identifiable persons.
  - b) Clients should be informed, to the extent possible, about disclosures and potential consequences. When feasible, the Client should be informed prior to disclosure.
  - c) Participating Agencies should advise Clients and other interested parties about limits on Clients' right to confidentiality, such as the fact that publicly available information is not protected.
  - d) Clients will be informed about when confidential information may be legally required.
  - e) Confidentiality of Clients will be protected when responding to the media, and in written and electronic records or other communications.
  - f) Supplying identifying information should be avoided whenever possible.
2. Ethical Use of Protected Information.
  - a) Only information that is directly relevant to the purposes for which the disclosure is made should be revealed, and use of the information should be limited to the purposes for which it was revealed.

- b) Each HMIS User will affirm the principles of ethical data use and Client confidentiality contained herein by their signature on the HMIS User Agreements.

## **6.02 Client Confidentiality**

**Policy:** Identifying data within the HMIS system will be protected according to HCCSC Privacy Plan guidelines. (See policy E.4)

## **6.03 Client Information**

### **Procedure:**

1. Client consent notice to share data must be signed by each Client seen in person whose data is to be entered into the HMIS. Verbal consent must be obtained in situations where the Client is not seen in person, such as telephone intakes, registrations, and assessments. Client refusal to sign the consent or verbally agree to data sharing will prevent individual data from being shared. The non-identifying data will still be used in aggregate reports.
2. Clients may revoke consent at any time through a written notice. Although the opt-out will stop the sharing of identifiable individual data, it will not cause data to be removed from the HMIS system.
3. No Client may be denied services for withholding or revoking consent for identifying HMIS data collection. A standard client revocation form will be available to all agencies.
4. Clients have a right to inspect, copy, and request changes in their HMIS records.
5. HMIS Users will notify Clients that they can opt out of the HMIS database, except during the central intake process.
6. If a Client opts out of HMIS but is served by HUD programs, data shall be entered under a special ID number and name to prevent Client identification.

## **6.04 Client Grievance**

### **Procedure:**

1. Resolution of Client grievances shall be handled by the Agency alleged to have caused the grievance, pursuant to that Agency's grievance procedure.
2. Except for grievances that allege a violation of the HMIS User Agreement, Participating Agencies will not report HMIS-related Client grievances to the HMIS Administrator.

## Agency Partner Agreement

*For the Stark County Homeless Management Information System (HMIS)*

Stark County's Homeless Management Information System (HMIS) is a shared homeless and housing database system administered by the Homeless Continuum of Care of Stark County (HCCSC).

The signature of the Executive Director of the Partner Agency indicates agreement with the terms set forth herein before a HMIS account can be established for the Agency.

HCCSC designates the Lead HMIS Agency. Lead Agency Staff shall serve as the HMIS Administrator. In this Agreement, "Partner Agency" is a Participating Agency in HMIS, "Client" is a consumer of services and "Agency" is the Agency named in this agreement.

### I. Confidentiality

- A. The Agency shall uphold all applicable federal and state confidentiality regulations and laws that protect Client information and the Agency shall only disclose Client information with written consent by the Client, unless required or permitted by law.
1. The Agency shall abide specially 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 rules prohibit 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 the federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.
  2. The Agency shall implement and comply with the provisions of the HCCSC HMIS Privacy Plan and HCCSC HMIS Security Plan (see policies E.4 and E.5) and all rules and regulations promulgated pursuant to authority granted therein (collectively and collectively with HUD, the "HUD Regulations," as supplemented, replaced and amended from time to time).
  3. The Agency shall provide a verbal explanation of the HMIS database and the terms of consent to each Client, and shall arrange for a qualified interpreter or translator in the event that an individual is not literate in English or has difficulty understanding the consent form.
  4. The Agency **shall not** solicit or input information from Clients into the HMIS database that is not essential to providing services or to conducting evaluation or research.

5. The Agency agrees **not** to release any confidential information received from the HMIS database to any organization or individual without proper Client consent.
6. The Agency shall ensure that all staff, volunteers and other persons issued a User ID and password for HMIS receives basic training on applicable confidentiality requirements and provisions set forth herein.
7. The Agency understands that the database will contain all Client information.
8. The Agency shall maintain documentation of Client consent to participate in the HMIS database.
9. The Agency **shall not** be denied access to Client data entered into the system by the Agency. Partner Agencies are bound by all restrictions placed upon the data by the Client of any Partner Agency. The Agency shall diligently record in the HMIS all restrictions requested. The Agency **shall not** knowingly enter false or misleading data under any circumstances.
10. If this Agreement or that of a Partner Agency is terminated, the Lead HMIS Agency and remaining Partner Agencies shall maintain their right to the use of all Client data previously entered by the terminating Partner Agency; this use is subject to any restrictions requested by the Client.
11. The Agency will utilize the Client Informed Consent & Release of Information Authorization form (see policy E.3), as developed in conjunction and coordination with Partner Agencies, for all Clients providing information for the HMIS database. The Client Consent/Information Release form, once signed by the Client, authorizes Client data to be entered into the HMIS database and authorizes information-sharing with HMIS Partner Agencies.
12. If a Client revokes consent for release of information, the Agency remains responsible for ensuring that the Client's information is unavailable to all other Partner Agencies.
13. The Agency shall keep signed copies of the Client Informed Consent & Release of Information Authorization form and any Revocation of Consent forms for HMIS for a period of three years.
14. Services shall be provided to Clients regardless of HMIS participation provided that Clients would otherwise be eligible for the services.

## II HMIS Use and Data Entry

- A. The Agency shall follow, comply with and enforce the HCCSC HMIS Privacy Plan and Security Plan and Data Quality Plan (see policies E.4, E.5 and E.6). Modifications to the HCCSC HMIS Privacy Plan and Security Plan and Data Quality Plan shall be established in consultation with

Partner Agencies and may be modified as needed for the purpose of smooth and efficient operation of the HMIS. HCCSC will announce approved modifications in a timely manner.

1. The Agency shall only enter program information about individuals in the HMIS database that exist as Clients under the Agency's jurisdiction. The Agency **shall not** misrepresent its Client base in the HMIS database by entering known inaccurate information.
  2. The Agency shall use Client information in the HMIS database, as provided to the Agency or Partner Agencies, to assist the Agency in providing adequate and appropriate services to the Client.
- B. The Agency shall consistently enter information into the HMIS database and will strive for real-time, or close to real-time<sup>1</sup> data entry.
  - C. The Agency **will not** alter information in the HMIS database that is entered by another Agency with known, inaccurate information (i.e. Agency **will not** purposefully enter inaccurate information to override information entered by another Agency).
  - D. The Agency **shall not** include profanity or offensive language in the HMIS database.
  - E. The Agency shall utilize the HMIS database for business purposes only.
  - F. Lead HMIS Agency will provide access to initial training and periodic updates to that training to select Agency Staff on the use of the HMIS software.
  - G. Lead HMIS Agency will be available for technical assistance (i.e. troubleshooting and report generation) within time and resource constraints.
  - H. The transmission of material in violation of any federal or state regulations is **prohibited**. This includes, but is not limited to, copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secrets.
  - I. The Agency **shall not** use the HMIS database with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.

### III. Reports

- A. The Agency shall retain access to identifying and statistical data on the Clients it serves.
- B. The Agency's access to data on Clients it does not serve shall be limited to that of Clients that have provided written consent permitting such access.

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<sup>1</sup> Real-time or close to real-time is defined by either immediate data entry upon seeing a Client or data entry into the HMIS database within five business days.

- C. The Agency may make aggregate data available to other entities for funding or planning purposes pertaining to providing services to homeless persons. However, such aggregate data **shall not** directly or indirectly identify individual Clients.
- D. HCCSC will use only non-identifying, aggregate HMIS data for homeless policy and planning decisions; in preparing federal, state or local applications for homeless funding; to demonstrate the need for and effectiveness of programs; and to obtain a system-wide view of program utilization in the state.

#### IV. Proprietary Rights

- A. The Agency **shall not** disclose assigned passwords and access codes of the HMIS database within any other Agency, business or individual.
- B. The Agency **shall not** cause in any manner, or way, corruption of the HMIS database in any manner.

#### V. Terms and Conditions

- A. The HCCSC **shall not** transfer or assign any rights or obligations without the written consent of the other party.
- B. This Agreement shall be in force until revoked in writing by either party.
- C. This Agreement may be terminated with 30 days written notice. Please note that this termination **does not** apply to information previously entered into the HMIS: obligations related to the confidentiality of Client information set forth herein shall continue to be adhered to beyond the termination of this Agreement.

\_\_\_\_\_  
Signature of Executive Director

\_\_\_\_\_  
Date

\_\_\_\_\_  
Agency Name

\_\_\_\_\_  
FEIN

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
City/State/Zip Code

\_\_\_\_\_  
Mailing Address (*Leave blank if same as above*)

\_\_\_\_\_  
City/State/Zip Code

## **Recommendations of the Recipient Approval and Evaluation Committee**

5/12/15

### Continuum of Care (CoC) Grant Funding

The Recipient Approval and Evaluation Committee (the Committee) is making the following recommendations to the Homeless Continuum of Care of Stark County (HCCSC) Board:

1. That all renewal projects, with the exception of the Alliance for Children and Families' (ACF) Transitional Housing (TH) Project and the YWCA's New Beginnings Transitional Housing Project, be invited to submit an application to HUD for 2015 CoC funding;
2. That CoC funding currently received by Alliance for Children and Families' and YWCA's New Beginnings TH projects be considered for reallocation to one or more types of projects which the Board or its designee(s) will define;
3. That, pursuant to the newly revised Procedures for Inviting and Reviewing Applications for CoC Funding, once the Board or its designee(s) define the types of projects for which reallocated funds can be used, ACF and YWCA will be invited to submit applications for conforming projects that make use of the funds to be reallocated from their current projects;
4. That, pursuant to these same procedures, in the event that YWCA or ACF chooses not to submit an application for a type of project approved by the Board or its designee(s), the HCCSC will issue a request for proposals from other agencies interested in using these funds for an approved project type; and
5. The HCCSC will entertain requests for proposal for these funds only from agencies that have experience as a grantee of federal funding,

### Emergency Solutions Grant (ESG) Funding

The Recipient Approval and Evaluation Committee is recommending that the HCCSC Board approve the following recommendations to the City of Canton with respect to its Emergency Solutions Grant funds:

1. Fund Community Services of Stark County's application for Homeless Prevention in the amount of \$81,328;
2. Fund the Mental Health and Recovery Services Board of Stark County's application for HMIS in the amount of \$28,351.
3. Discuss with the HCCSC options for funding activities utilizing the remainder of the funds - \$89,066.50. (The total ESG allocation is \$214,860 with \$16,114.50 being set aside for administration.)

4. Based on the HCCSC's recommendations and discussions with the City, accept new applications or invite selected agencies to apply for funding.
5. Deny funding to Refuge of Hope for Emergency Shelter repairs since these repairs have already been completed and are, therefore, ineligible for funding.

## **Recipient Approval and Evaluation Committee**

### **Factors considered on Recommended Re-Allocations for 2015 CoC Application**

#### **Alliance for Children & Families - Transitional Housing:**

1. Corporation for Supportive Housing Transitional Housing Analysis indicated that this project could be successful as a rapid re-housing project due to the characteristics of the populations being served and the successful project outcomes. Please see the portion of the CSH report regarding this project (page 7).
2. As this project is scattered site Transitional Housing, the model is in fact a Rapid Re-Housing model and clients typically served by this project could be served in a rapid re-housing project which provided up to the maximum level of assistance, which is also 24 months (the same as for transitional housing).
3. Our waiting list for Permanent Supportive Housing for chronically homeless individuals is very long and is not moving. We need to address the need for more PSH for chronically homeless singles who have long histories of homelessness and who are not accessing current housing due to extensive barriers. Many of these singles are those with prior sex offenses. It is difficult to place in single site housing due to location restrictions imposed on those with these histories and NIMBY issues with many ex-offenders in one building. Scattered site units in non-restricted areas, agencies who can advocate for this population and who already have partnerships with landlords to take hard to serve populations is much needed. Shirene Starn-Tapyrik indicated ACF's willingness to develop a project such as this and support for the ACF Transitional Housing project to be re-allocated to allow for more targeting of housing for chronically homeless person with the highest needs.

#### **YWCA - New Beginnings Transitional Housing**

1. . Corporation for Supportive Housing Transitional Housing Analysis indicated that this project was more suited to RRH due to the characteristics of the families it was serving and outcomes. CSH acknowledged the structure of the facility was not conducive to RRH but recommended using the grant for RRH in scattered site and recognized that the YWCA had other projects which worked with private landlords. CSH felt that the participants could have been served with equal success in a more cost-efficient rapid re-housing project and providing the clients permanent housing immediately. Please see the portion of the CSH report regarding this project (page 7).
2. Significantly low utilization in their last APR and currently experiencing some trouble filling the units as the number of eligible families for transitional housing is very low as well as some eligible families are refusing to go to New Beginnings. Units are all family units and ODSA (State) who provides the support service dollars has not yet agreed to allow this project to serve singles in the family units. There is a meeting scheduled with Scott Gary of ODSA for May 22nd to address some of these concerns with the HCCSC Executive Committee and all of our ODSA grantees in Stark County. As the 2015 CoC Registration is due prior to this meeting (on May 18th) the Committee recommends we move forward with consideration for reallocation in case this project cannot be re-tooled to address the highest homeless needs and a new project is necessary. Much consideration and discussions with the YWCA must be given for how the current building, in which New Beginnings operates, can still be maintained and used to address homeless and/or low income affordable housing in the community so that those units are not sitting vacant and/or causing a financial hardship on the YWCA.

3. Those with highest priority, per central intake & assessment, for TH are typically singles which is not conducive to the family units at New Beginnings currently. Until we meet with ODSA we do not know if they will allow these units to be used for singles. We, and the YWCA, are also unsure of the success of a project which would require high needs individuals to share a unit, particularly without 24 hour onsite supervision. Basic Accommodations, which has the same room configuration as New Beginnings, has challenges with this even with having 24 hour on-site supervision.

Note for Consideration:

If both of these projects are re-allocated there will be no more CoC-funded Transitional Housing in Stark County. We will need to ensure that rapid re-housing projects can address this gap. We are having CSH look into this issue as they work with us.