
Agencies may not use the HMIS system, participation or data as a reason to deny services or housing to a client. (Adopted 4/8/02)

DATA ACCESS (Adopted 4/8/02)

1. Agency data entry/updating permission applies only to clients currently receiving services or housing.
2. Only authorized users may view or update client data.
3. Agencies will have a signed **Client Consent Form (CCF)** prior to data entry/updating.
4. Each adult member of a household that is receiving housing or services will be expected to sign a CCF prior to initial data entry or updating.
5. Consent for data entry/updating for minors will be provided for in the language of the parent/guardian's CCF.
6. The CCF must be renewed annually for clients still receiving housing and services.
7. The CCF may be revoked by a client at any time.
8. A CCF allows an agency to view (but not change) data on the clients for reporting purposes in perpetuity.
9. If a CCF cannot be obtained, the agency shall enter client data as non-releasable, hidden information for aggregate reporting purposes.
10. A client always has the right to view his or her own data and request corrections.

AGGREGATE DATA SHARING AND RELEASE (Adopted 4/8/02)

1. Each agency owns the client data for housing and/or services provided by them.
2. Agencies are encouraged to use their own HMIS data for public relations, reporting and funding as long as client confidentiality is maintained.
3. Community-wide aggregate HMIS homeless data (not agency specific) will be published quarterly by HMIS. These reports will be raw point-in-time data. Any agency may use published HMIS data.
4. Special requests for aggregate or de-identified data release must be authorized by the HMIS Advisory Committee.
5. The independent Continuum of Care facilitator may use HMIS data for continuum planning, reporting and grantwriting processes including Consolidated Plans, Gaps Analysis, HUD reporting, Emergency Shelter Grants, IDIS, EZ, etc, and may reconcile and release aggregate data to the City of Cincinnati and Hamilton County.
6. The Continuum of Care Facilitator may enter into an agreement with individual agencies or partnerships to view raw data in order to provide technical assistance. (Adopted 3/10/03)

INDIVIDUAL DATA SHARING, RELEASE AND CONFIDENTIALITY (Adopted 4/8/02)

1. A **client consent form (CCF)** does not authorize the agency to release information about a client from the database. The agency's own Agreement and Release form and process must still be used prior to information sharing.

2. Full data sharing among agencies will only be allowed with a signed partnership agreement spelling out details, services, term, and participating agencies.
3. (adopted 2/11/02) In accordance with the Technology Committee's work, the HMIS system has three levels of data sharing:
4. Level 1 – Basic Demographic Data (that data which identifies the homeless person's basic demographics and is used to generate the homeless certification).
5. Level 2 – Services Data (that data which identifies services needed and/or received by the homeless person but is not case management case notes).
6. Level 3 – Special Needs Data (that data which identifies a person as having a special need related to substance abuse, a mental health diagnosis, HIV/AIDS, physical/mental/cognitive disabilities, and/or domestic violence).

GRIEVANCE PROCEDURE *(Adopted 4/8/02)*

An agency client has the right to appeal his or her individual issues related to HMIS to in accordance with agency-dictated grievance policy, or by the following progression:

1. Case worker
2. Case worker's supervisor
3. Executive Director of the Agency

PARTICIPATION STANDARDS *(adopted 2/11/02)*

1. Client Basic Demographic Data is to be entered into HMIS system within two working days of a residential intake. (Residential = emergency shelter stay, transitional housing stay, permanent – service enriched housing stay).
2. Limited basic demographic data is to be entered into HMIS system within two working days of the first substantial outreach encounter. (Substantial encounter to be defined by outreach workers.)
3. Services and special issues data is to be entered into the HMIS system within one week of the client exiting a housing stay or receiving a services only service.
4. One hundred percent (100%) of all homeless residential clients are to be entered into the system, detailing Basic, Services and Special Needs Data. (Entry of non-homeless data is optional.)
5. One hundred percent (100%) of all Cincinnati/Hamilton County Continuum of Care homeless certified clients will have Services Data entered into the system. (Entry of non-Cincinnati/Hamilton County CoC data is optional.)
6. CoC and ESG agencies should be given priority for inclusion in the HMIS system. Once those agencies are on or have been offered participation in the system the system may be offered to other residential facilities serving homeless persons.

HMIS USER RULES *(adopted 2/11/02)*

1. Each user must sign a user agreement stating full understanding of system rules and protocols before receiving a username and password to access the system. These agreements must be renewed annually or user access to the system will be revoked.
2. Each user must receive training in use of the HMIS system.
3. Agencies may have an unlimited number of users of the HMIS system; each must have his or her own username and password.
4. Agency directors must approve each individual user from their agency.
5. Only paid staff of participating agencies may access or be users of the HMIS system.

6. Access permission is contingent on continued employment at the agency, and will be terminated immediately if the user is no longer employed by the agency.