Kings/Tulare HMIS
Policies and Procedures

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1. Introduction

This document provides the framework for the ongoing operations of the Kings/Tulare County Homeless Management Information System Project (KTHMIS). The Project Overview provides the main objectives, direction and benefits of KTHMIS. Governing Principles establish the values that are the basis for all policy statements and subsequent decisions.

Operating Procedures provides specific policies and steps necessary to control the operational environment and enforce compliance in:

- Project Participation
- User Authorization and Passwords
- Collection and Entry of Client Data
- Release and Disclosure of Client Data
- Server Security
- Server Availability
- Workstation Security
- Training
- Technical Support

2. Project Overview

The long-term vision of KTHMIS is to enhance Partner Agencies' collaboration, service delivery and data collection capabilities. Accurate information will put the Kings/Tulare Continuum of Care on Homelessness (The Continuum) in a better position to request funding from various sources and help plan better for future needs.

The mission of the KTHMIS Project is to be an integrated network of homeless and other service providers that use a central database to collect, track and report uniform information on client needs and services. This system will not only meet Federal requirements but also enhance service planning and delivery.

The fundamental goal of KTHMIS is to document the demographics of homelessness in Kings and Tulare counties according to the HUD HMIS Standards. It is then the goal of the project to identify patterns in the utilization of assistance, and document the effectiveness of the services for the client. This will be accomplished through analysis of data that is gathered from the actual experiences of homeless persons and the service providers who assist them in shelters and homeless assistance programs throughout the two counties. Data that is gathered via intake interviews and program participation will be used to complete HUD Annual Progress Reports. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, service providers, advocates, and consumer representatives.

The project utilizes a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the county. Access to the central server is limited to agencies formally participating in the project and then only to authorized staff members who meet the necessary training and security requirements.

KTHMIS is staffed and advised by Kings Tulare Continuum of Care and Kings United Way (KTCoC/KUW). Kings United Way's Executive Director is the authorizing agent for all agreements made between Partner Agencies and KTHMIS. The KTHMIS Specialist is responsible for the administration of the central server and user access. KTHMIS Project Staff will also provide technology, training and technical assistance to users of the system throughout the two counties.

The HMIS Committee of The Continuum is responsible for oversight and guidance of KTHMIS. This group is committed to balancing the interests and needs of all stakeholders involved: homeless men, women, and children; service providers; and policy makers.

Potential benefits for homeless men, women, and children and case managers: Service coordination can be improved when information is shared among case management staff within one agency or with staff in other agencies (with written client consent) who are serving the same clients.

Potential benefits for agencies and program managers: Aggregated, information can be used to develop a more complete understanding of clients' needs and outcomes, and then used to advocate for additional resources, complete grant applications, conduct evaluations of program services, and report to funding agencies such as HUD.

Potential benefits for Continuum of Care and policy makers: Countywide involvement in the project provides the capacity to generate HUD Annual Progress Reports for the Continuum of Care and allows access to aggregate information both at the local and regional level that will assist in identification of gaps in services, as well as the completion of other service reports used to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

3. Governing Principles

Described below are the overall governing principles upon which all decisions pertaining to KTHMIS are based.

Participants are expected to read, understand, and adhere to the spirit of these principles, even when the Policies and Procedures do not provide specific direction.

Confidentiality

The rights and privileges of clients are crucial to the success of KTHMIS. These policies will ensure clients' privacy without impacting the delivery of services, which is the primary focus of agency programs participating in this project.

Policies regarding client data are founded on the premise that a client owns his/her own personal information and provide the necessary safeguards to protect client, agency, and policy level interests. Collection, access and disclosure of client data through KTHMIS will only be permitted by the procedures set forth in this document.

Data Integrity

Client data is the most valuable and sensitive asset of KTHMIS. These policies will ensure integrity and protect this asset from accidental or intentional unauthorized modification, destruction or disclosure.

System Availability

The availability of a centralized data repository is necessary to achieve the ultimate countywide aggregation of unduplicated homeless statistics. The HMIS Coordinator is responsible for ensuring the broadest deployment and availability for homeless service agencies in Kings and Tulare counties.

Compliance

Violation of the policies and procedures set forth in this document will have serious consequences. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity will result in the withdrawal of system access for the offending entity.

4. Roles and Responsibilities

Kings/Tulare Continuum of Care on Homelessness (The Continuum)

HMIS Committee

- Project Direction and Guidance
- Technology Plan
- Selection of System Software
- Approval of Project Forms and Documentation
- Project Participation and Feedback
- Project Funding
- Adherence to HUD Data Standards

Kings United Way Executive Director

- Liaison with HUD
- Project Staffing
- Signatory Agent for Agency Agreements
- Adherence to HUD Data Standards
- System Backup and Disaster Recovery Plan

HMIS Coordinator

- Creation of Project Forms and Documentation
- Project Website
- Project Policies and Procedures and Compliance
- General Responsibility for Project Rollout
- Curriculum Development
- Training Timetable
- Training Documentation
- Confidentiality Training
- Outreach
- Adherence to HUD Data Standards

HMIS Specialist

- Keeper of Signed Agency Agreements
- User Administration
- Add and Remove Partner Agency Site Administrators
- Manage User Licenses
- Ongoing Protection of Confidential Data
- Application Training For Agency Administrators And End Users
- End User Support
- Helpdesk
- Adherence to HUD Data Standards
- Application Customization
- Data Monitoring
- Data Validity
- Aggregate Data Reporting and Extraction
- Assist Partner Agencies With Agency-Specific Data Collection And Reporting Needs (Within Reason And Within Constraints Of Other Duties)

Partner Agency (PA)

Partner Agency Executive Director

- Authorizing Agent for Partner Agreement (Agency Agreement)
- Designation of Site Administrator
- Agency Compliance with Policies & Procedures
- End User Licenses
- Agency Level HUD Reporting
- Each Partner Agency is responsible for ensuring they meet the Privacy and Security requirements as detailed in the HUD HMIS Data and Technical Standards
- Annually, conduct a thorough review of internal policies and procedures regarding HMIS
- Adherence to HUD Data Standards

Partner Agency Site Administrator

- Authorizing agent for Partner Agency User Agreements
- Keeper of Partner Agency User Agreements
- Keeper of executed Client Informed Consent Forms
- Point of contact for HMIS related matters
- Maintains staff workstations
- Internet connectivity
- End User adherence to Workstation Security Policies
- Detecting and responding to violations of the Policies And Procedures
- First level end user support
- Maintain Agency/Program Data In KTHMIS application
- Conduct authorized imports of client data
- Adherence to HUD Data Standards

Agency Staff

- Safeguard client privacy through compliance with Confidentiality Policies
- Data collection as specified by training and other documentation
- Adherence to HUD Data Standards

5. Operating Procedures

5.1 Project Participation

Policies

Agencies participating in KTHMIS shall commit to abide by the governing principles of KTHMIS and adhere to the terms and conditions of this partnership as detailed in the Memorandum of Understanding.

Procedures

Confirm Participation

1. The Partner Agency shall confirm their participation in KTHMIS by submitting an executed Agency Agreement to the KTHMIS Specialist.
2. The KTHMIS Specialist will obtain the co-signature of Kings United Way Executive Director.
3. The KTHMIS Specialist will maintain a file of all signed Agency Agreements.
4. The KTHMIS Specialist will update the list of all Partner Agencies and make it available to the project community and post this list on the KTHMIS website (www.kingstularecoc.org).
5. All Partner Agencies will be listed on the KTHMIS website.

Terminate Participation

Voluntary

1. The Partner Agency shall inform the KTHMIS Specialist in writing of their intention to terminate their agreement to participate in KTHMIS.
2. The KTHMIS Specialist will inform the Kings United Way Executive Director and update the Participating Agency List.
3. The KTHMIS Specialist will revoke access of the Partner Agency staff to KTHMIS. Note: All Partner Agency-specific information contained in the KTHMIS system will remain in the KTHMIS system.
4. The KTHMIS Specialist will keep all termination records on file with the associated Agency Agreement.

Lack of Compliance

1. When the KTHMIS Specialist determines that a Partner Agency is in violation of the terms of the partnership, Executive Directors of Partner Agency and Kings United Way will work to resolve the conflict(s).
2. If Executive Directors are unable to resolve conflict(s), the CoC President will be called upon to resolve the conflict. If that results in a ruling of Termination:
    a) The Partner Agency will be notified in writing of the intention to terminate their participation in KTHMIS.
    b) The KTHMIS Specialist will revoke access of the Partner Agency staff to KTHMIS.
    c) The KTHMIS Specialist will keep all termination records.

Assign Site Administrator

1. The Partner Agency shall designate a primary contact for communications regarding KTHMIS by submitting a Partner Agency Site Administrator Agreement form to the KTHMIS Specialist.
2. The KTHMIS Specialist will obtain all signatures necessary to execute the Partner Agency Site Administrator Agreement.
3. The KTHMIS Specialist will maintain a file of all signed Site Administrator Assignment forms.
4. The KTHMIS Specialist will maintain a list of all assigned Partner Agency Site Administrators and make it available upon request.

Re-Assign Site Administrator

1. The Partner Agency may designate a new or replacement primary contact in the same manner as above.

Site Security Assessment

1. Prior to allowing access to KTHMIS, the Partner Agency Site Administrator and the KTHMIS Specialist will meet to review and assess the security measures in place to protect client data.
2. The Partner Agency Executive Director (or designee) and Partner Agency Site Administrator will meet with a KTHMIS staff member to assess the Partner Agency information security protocols. This review shall in no way reduce the responsibility for Partner Agency information security, which is the full and complete responsibility of the Partner Agency, its Executive Director, and Site Administrator.
3. Partner Agencies shall have virus protection software on all computers that access KTHMIS.

5.2 User Authorization & Passwords

Policies

- Partner Agency staff participating in KTHMIS shall commit to abide by the Governing principles of KTHMIS and adhere to the terms and conditions of the Partner Agency User Agreement.
- The Partner Agency Site Administrator must only request user access to KTHMIS for those staff members that require access to perform their job duties.
- All users must have their own unique user ID and should never use or allow use of a user ID that is not assigned to them [see Partner Agency User Agreement].
- Temporary, first time only, passwords will be communicated via email to the owner of the user ID.
- User-specified passwords should never be shared and should never be communicated in any format.
- New user IDs must require password change on first use.
- Passwords must consist of at least 8 characters and must contain a combination of letters and numbers (no special characters; alpha and numeric only). The password must contain at least two numbers [required by software]. According to the HUD Data and Technical Standards Final Notice (July 2004):
- For Partner Agency Site Administrators, passwords may only be reset by the KTHMIS Specialist.
- For Agency Users (not including Partner Agency Site Administrator), passwords should be reset by the Partner Agency Site Administrator, but in some cases may be reset by the KTHMIS Specialist.

Procedures

Workstation Security Assessment

1. Prior to requesting user access for any staff member, the Partner Agency Site Administrator will assess the operational security of the user's workspace.
2. Partner Agency Site Administrator will confirm that workstation has virus protection properly installed and that a full-system scan has been performed within the last week.
3. Partner Agency Site Administrator will confirm that workstation has and uses a hardware or software firewall.

Request New User ID

1. When the Partner Agency Site Administrator identifies a staff member that requires access to KTHMIS, a Partner Agency End User Agreement (PAEUA) will be provided to the prospective user.
2. The prospective user must read, understand and sign the PAEUA and return it to the Partner Agency Site Administrator.
3. The Partner Agency Site Administrator will obtain the Executive Director's signature and forward to the KTHMIS Specialist. The Partner Agency Site Administrator will keep a copy on file.
4. The KTHMIS Specialist will create the new user ID as specified and notify the user ID owner of the temporary password via email.

Change User Access

When the Partner Agency Site Administrator determines that it is necessary to change a user's access level, the Partner Agency Site Administrator will request this change via e-mail to the

KTHMIS Specialist.

Rescind User Access

Voluntary

Use this procedure when any KTHMIS user leaves the agency or otherwise becomes inactive:

1. Send an e-mail notification to the KTHMIS Specialist. The user's ID and password status within the system will be changed to an "inactive" status. The user's ID or password will not be deleted.

Compliance Failure

Use this procedure when any KTHMIS user breaches the PAEUA, or violates the Policies and Procedures, or breaches confidentiality or security:

1. Send an e-mail notification to the KTHMIS Specialist. The user's ID and password status within the system will be changed to an "inactive" status.
2. The KTHMIS Specialist will determine what other, if any, other user IDs should be deactivated.

Reset Password

1. When a user forgets his or her password or has reason to believe that someone else has gained access to their password, they must immediately notify their Partner Agency Site Administrator.
2. The Partner Agency Site Administrator will send a request via e-mail to the KTHMIS Specialist to reset the user's password and notify the user of the new temporary password.

5.3 Collection and Entry of Client Data

Policies

- Client data will be gathered according to the policies, procedures and confidentiality rules of each individual program.
- Client data may only be entered into KTHMIS with client's authorization to do so.
- All universal and program data elements from the HUD KTHMIS Data and Technical Standards Final Draft should be collected, subject to client consent.
- Client data will only be shared with Partner Agencies if the client consents, has signed the Client Consent form, and the signed Client Consent form is available on record.
- Client data will be entered into KTHMIS in a timely manner.
- DV providers must keep a log containing the client's name and client ID number generated by the HMIS system.
- Client identification should be completed during the intake process or as soon as possible following intake and within 24 hours.
- Service records should be entered on the day services began or as soon as possible within 24 hours.
- Required assessments should be entered as soon as possible following the intake process and within 24 hours.
- All client data entered into KTHMIS will be kept as accurate and as current as possible.
- Hardcopy or electronic files will continue to be maintained according to individual program requirements, and according to the HUD KTHMIS Data and Technical Standards Final Draft.
- No data may be imported without the client's authorization.
- Any authorized data imports will be the responsibility of the Partner Agency.

- Partner Agencies are responsible for the accuracy, integrity, and security of all data input by said Agency according HUD's guidelines and the KTHMIS Data Quality Plan.
- Our Continuum of Care is committed to entering client specific data into KTHMIS that is accurate, complete, and timely to ensure quality of data, and to provide reports to agency executive management, public policy decision makers, and all participating homeless service and housing providers.
- Data quality of client specific data is essential to the meaningful analysis and accurate reporting of the Continuum of Care data.
- Data quality shall be a concern of highest importance and all members of the Continuum of Care will work to continuously improve quality.
- Quality assurance shall be the ultimate responsibility of each Partner Agency's Executive Director. Kings United Way will provide Exception Reports to the Partner Agency's Site Administrator who is designated by the Partner Agency Executive Director.
- The Partner Agency that creates a client record owns the responsibility for a baseline of data quality to include: non-duplication of client record, Release Of Information (ROI), Universal & Program level data elements as defined by HUD Data Standards, up-to-date Program Entries and Exits, and answers to the questions, "Currently Homeless?" and "Chronically Homeless?"
- Each Partner Agency that comes in contact with a client has an opportunity to improve data quality and should make every effort to do so when that opportunity arises.
- The Continuum of Care will decide on a plan to dispose of (or remove identifiers from) client data seven (7) years after it was created or last changed.

Procedures

- Refer to Data Quality Plan, User Manual and/or Training Materials for specific data entry guidelines.
- Kings United Way will provide each agency with an ongoing Universal Data Quality Report, and provide the training necessary in order for the Partner Agency to be able to download and report to the appropriate parties within the agency.
- The Partner Agency Site Administrator will share data with authorized personnel only (those with KTHMIS authorization).
- Partner Agency Site Administrator will be responsible for reviewing the Universal Data Quality Reports and notifying users to make corrections, within one week.
- Partner Agency Site Administrator will inform the KTHMIS Site Administrator if there are any technical issues retrieving the Universal Data Quality Reports within three (3) business days.
- Upon request of Partner Agency Executive Management, Kings United Way will provide additional reports to assist the agency in verifying data quality.
- The HMIS Committee shall decide on the procedure to properly dispose of client data within the seven-year time frame allocated in the HUD Data Standards.

5.4 Release and Disclosure of Client Data

Policies

- Client-specific data from KTHMIS may be shared with Partner Agencies only when the sharing agency has secured a valid Release of Information from that client authorizing such sharing, and only during such time that Release of Information is valid (before its expiration). Other non-KTHMIS inter-agency agreements do not cover the sharing of KTHMIS data.
- Sharing of client data may be limited by program specific confidentiality rules.

- No client-specific data will be released or shared outside of the Partner Agencies unless the client gives specific written permission or unless withholding that information would be illegal (see Release of Information). Note that services may NOT be denied if client refuses to sign Release of Information or declines to state any information.
- Release of Information must constitute INFORMED consent. The burden rests with the intake counselor to inform the client before asking for consent. As part of informed consent, a notice must be posted explaining the reasons for collecting the data, the client's rights, and any potential future uses of the data. An example of such a sign for posting may be found at www.kingstularecoc.org under Forms.
- Client shall be given print out of all data relating to them upon written request and within 10 working days.
- A report of data sharing events, including dates, agencies, persons, and other details, must be made available to the client upon request and within 10 working days.
- A log of all external releases or disclosures must be maintained for seven (7) years and made available to the client upon written request and within 10 working days.
- Aggregate data that does not contain any client specific identifying data may be shared with internal and external agents without specific permission. This policy should be made clear to clients as part of the Informed Consent procedure.
- Each Partner Agency Executive Director is responsible for his or her agency's internal compliance with the HUD Data Standard.

Procedures

- Procedures for disclosure of client-specific data are readily obtained from the above policies, combined with the configuration of KTHMIS, which facilitates appropriate data sharing.

5.5 Workstation Security

Policies

- The Partner Agency Site Administrator is responsible for preventing degradation of the whole system resulting from viruses, intrusion, or other factors under the agency' s control.
- The Partner Agency Site Administrator is responsible for preventing inadvertent release of confidential client-specific information. Such release may come from physical or electronic or even visual access to the workstation, thus steps should be taken to prevent these modes of inappropriate access (that is, don't let someone read over your shoulder: lock your screen).
- All workstations to be used with KTHMIS must be secured by a firewall between the workstation and the Internet. Software firewalls are acceptable.
- Recommended Internet connection: DSL or Cable Modem, at least 128 kbits.
- Recommended Browser: latest release of Internet Explorer version 5.5.
- Definition and communication of all procedures to all Partner Agency users for achieving proper agency workstation configuration and for protecting their access by all Agency users to the wider system are the responsibility of the Partner Agency Site Administrator.

Procedures

- At a minimum, any workstation accessing the central server shall have anti-virus software with current virus definitions (24 hours) and frequent full-system scans (weekly).

5.6 Training

Policies

- The Partner Agency Executive Director shall obtain the commitment of the Partner Agency Site Administrator and designated staff persons to attend training(s) as specified in the Agency Agreement between Partner Agency and KTCoC/KUW.

Procedures

Start-up Training

KTCoC/KUW will provide training in the following areas prior to the Partner Agency using KTHMIS:

1. Partner Agency Site Administrator training
2. End user training
3. Confidentiality training

Partner Agency Site Administrator Training

Training will be done in a group setting, where possible to achieve the most efficient use of time and sharing of information between agencies. Training will include:

1. New user set-up
2. End user training
3. Running package reports

Follow-up Training

KTCoC/KUW will provide on-site follow-up training at each participating Partner Agency. Once the Partner Agency has "gone live," KTHMIS representatives will make on-site visits as needed to ensure that the Partner Agency becomes proficient in the use of KTHMIS.

On-going Training

KTCoC/KUW will provide regular training for participating Partner Agencies, as needed. The areas covered will be:

1. Agency Site Administrator Training
2. End User Training
3. Confidentiality Training

5.7 Compliance

Policies

- Compliance with these Policies and Procedures is mandatory for participation in KTHMIS.
- Using the Client Track software, all changes to client data are recorded and will be periodically and randomly audited for compliance.
- Each Partner Agency is responsible for ensuring they meet the Privacy and Security requirements detailed in the HUD HMIS Data and Technical Standards.
- Quarterly, Partner Agencies will conduct a thorough review of internal policies and procedures regarding KTHMIS.
- Annually, KTHMIS will conduct a thorough review of Partner Agency internal policies and procedures regarding KTHMIS.

Procedures

- See “Project Participation” and “User Authorization” sections for procedures to be taken for lack of compliance.
- Quarterly, a KTHMIS representative, will send out (via email or mail) the Agency Directors’ Compliance Checklist to each Partner Agency.
- The Partner Agency Executive Director will conduct a review of each site where KTHMIS is used using the Checklist as a guide.
- If areas are identified that require action, the Partner Agency Executive Director will note these on the checklist, and corrective action will be implemented within one month.
- Annually, a KTHMIS representative will conduct a site visit at each Partner Agency to ensure compliance. Agencies that are new to KTHMIS will be scheduled for a site visit six months from implementation of HMIS and then annually thereafter.

5.8 Technical Support

Policies

- Support requests include problem reporting, requests for enhancements (features), or other general technical support.
- Users shall submit support requests to their Partner Agency Site Administrator (email is suggested).
- Users shall not, under any circumstances, submit requests to software vendor.
- Users shall not submit requests directly to KTCoC/KUW without specific invitation. All requests to KTCoC/KUW shall be submitted to Partner Agency Site Administrator, who may then escalate to KTCoC/KUW, who may then escalate to vendors as appropriate.
- KTCoC/KUW will only provide support for issues specific to KTHMIS software and systems.

Procedures

Submission of Support Request

- User encounters problem or originates idea for improvement to system or software.
- User creates support request via email sent to Partner Agency Site Administrator specifying the severity of the problem and its impact on their work, specific steps to reproduce the problem, and any other documentation that might facilitate the resolution of the problem. User shall also provide contact information and best times to contact.
- The Partner Agency Site Administrator, upon receipt of a support request, shall make reasonable attempts to resolve the issue.
- If the Partner Agency Site Administrator is unable to resolve the issue and determines that the problem is specific to KTHMIS software and systems, the Partner Agency Site Administrator shall consolidate multiple similar requests and submit to KTCoC/KUW.

  Note: If the Support Request is deemed by KTHMIS Specialist to be an agency-specific customization, resolution of the request may be prioritized accordingly. KTCoC/KUW reserves the right to charge on an hourly basis for these changes if/when the workload for such agency-specific customizations becomes burdensome.

- The KTHMIS Specialist may at this point determine that the cause of reported issue is outside the scope of control of the KTHMIS software and systems.
- The KTHMIS Specialist will consolidate such requests from multiple Partner Agencies, if appropriate, and strive to resolve issues according to their severity and impact.
- If the KTHMIS Specialist is unable to resolve the issue, other software or system vendor(s) may be included in order to resolve the issue(s).

- In cases where issue resolution may be achieved by the end user or other Partner Agency personnel, the KTHMIS Specialist will provide instructions via email to the Partner Agency Site Administrator.

5.9 Changes to This and Other Documents

Policies

- The HMIS Committee of The Continuum will guide the compilation and recommendations for amendments of these Policies and Procedures. Final approval rests with KTCoC and KUW.

Procedures

Changes to Policies & Procedures

- Proposed changes may originate from any participant in KTHMIS.
- When proposed changes originate within a Partner Agency, they must be reviewed by the Partner Agency Executive Director, and then submitted by the Partner Agency Executive Director to the KTHMIS Specialist for review and discussion.
- KTHMIS Specialist will maintain a list of proposed changes.
- The list of proposed changes will be discussed by the HMIS Committee, subject to line item excision and modification. This discussion may occur either at a meeting of the HMIS Committee, via email or conference call, according to the discretion and direction of the HMIS Committee Chairperson.
- Results of said discussion will be communicated, along with the amended Policies and Procedures. The revised Policies and Procedures will be identified within the document by the date of the HMIS Committee discussion.
- Partner Agencies Executive Directors shall acknowledge receipt and acceptance of the revised Policies and Procedures within 10 working days of delivery of the amended Policies and Procedures by notification in writing or email to KTHMIS Specialist. The Partner Agency Executive Director shall also ensure circulation of the revised document within their agency and compliance with the revised Policies and Procedures.

6. Other Obligations and Agreements

The current HUD grant for KTHMIS provides for a limited number of user licenses. While it may not be possible to meet every agency's full requirements for licenses within the HUD grant to KTCoC/KUW, KTHMIS will endeavor to ensure that every agency participating will have their minimum requirements met from the HUD grant for the first year of the project unless the participant has HUD HMIS grant funding to cover implementation and operating costs.

User licenses are allocated by the percentage of bed inventory covered by a program, per housing type. The license allocations are based on the following matrix, with an agency cap of five user licenses:

User Seat Distribution	
	# of seats
10% and Under	0
10.01% - 15%	1
15.01 - 25%	2
Over 25%	3

Once an agency is self-funding their HMIS user licenses, said licensing fees will no longer be sustained through the KTHMIS grant. User license fees will be billed to each agency by Kings United Way on a quarterly basis in advance. There will not be any refunds and/or credits issued for user licenses paid for but not utilized.

6.1 HUD HMIS Data and Technical Standards

This document should, at a minimum, reflect the baseline requirements listed in the HMIS Data and Technical Standards Final Notice, published by HUD in July 2004. Users of KTHMIS are required to read and comply with the HMIS Data and Technical Standards. Failure to comply with these standards carries the same consequences, as does failure to comply with these Policies and Procedures. In any instance where these Policies and Procedures are not consistent with the KTHMIS Standards from HUD, the HUD Standards take precedence. Should any inconsistencies be identified, notice should be made to the KTHMIS Specialist.

6.2 HIPAA

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements (as specified in those requirements) and these policies and procedures.

7. Forms Control

All forms required by these procedures are available in PDF format on the project website, www.kingstularecoc.org.

Filing of Completed Forms

Form Description	Location	Responsibility
Agency Agreement	Kings United Way	HMIS Specialist
Site Administrator Agreement	Kings United Way	HMIS Specialist
Interagency Data Network Sharing Agreement	Kings United Way	HMIS Specialist
End User Agreement	Kings United Way	HMIS Specialist
Intake Application & Assessments	Partner Agency	Agency Staff
Client Consent – Release of Information for Data Sharing	Partner Agency	Agency Staff
Client Revocation of Consent to Release Information for Data Sharing	Partner Agency	Agency Staff
Discharge Application	Partner Agency	Agency Staff