

Morris County Continuum of Care Data Quality Committee
Standard Operating Procedure
September 2021

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Mission and Structure of Data Quality Subcommittee

Mission

The overall mission of the Data Quality Committee is to work towards the improvement of data quality which will lead to better continuum of care for consumer services and an increase of funding to the county for consumer needs.

Purpose

The Data Quality Subcommittee was created in January 2016 with the purpose of establishing a coordinated effort within the Morris County Continuum of Care (CoC) to:

1. inform and advise the CoC Executive Committee regarding data-related needs and concerns and to make recommendations to the Executive Committee on data-related policies and procedures.
2. work in collaboration with other CoC committees to develop and maintain policies and procedures as they relate to data requirements, data entry and data integrity throughout the Morris County CoC.
3. facilitate the collaboration of all CoC providers on data issues and the improvement of data integrity.
4. ensure that all agencies within the CoC are adhering to HUD standards and regulations.
5. establish annual goals and to monitor and evaluate the annual work plan.

Membership and Voting

The Data Quality Committee shall have two types of representatives:

1. Ex Officio members will act in an advisory capacity and do not have the ability to vote. Ex Officio members will include Executive Committee representatives, consultant representatives from HMFA and Monarch Housing and County of Morris Department of Human Services representatives.
2. Each agency within the CoC will appoint one staff member as a primary representative to the committee. Each agency may also appoint one additional representative to ensure continuity of committee activities should one representative be unable to attend. One representative per agency will be counted towards quorum and only one representative allowed to vote per agency. Quorum will be 51% of membership.

Officers

The Data Quality Committee shall have one Chairperson and one Co-chairperson, who will act in the absence of the Chairperson. The responsibilities of the Chairperson will be to set the meeting dates and times, set the annual work plan, with input from the committee, prepare meeting agendas, run meetings, act as a liaison between members and Executive Committee and maintain membership directory.

Officers will be chosen on a volunteer basis. If more than one member volunteers for a position, officers will be chosen through regular voting procedure.

Attendance

Members of the Data Quality Subcommittee must attend a minimum of 75% of the regularly scheduled meetings in the year. The Committee Chair tracks attendance and alerts the Executive Committee to attendance issues. The Committee Chair also provides an annual attendance report to the CoC Allocations Committee to inform CoC funding decisions.

Meetings

The annual meeting schedule will be planned by the Chair with input from the Committee. There will be a minimum of four meetings per year but more may be added based on the goals and objectives in the Work Plan.

Data Quality Standards

Data quality is a term that refers to the reliability and validity of client-level data, including accuracy and completeness of all information collected and reported to HMIS. It is measured by the extent to which data in the system reflects actual information in the real world. With good data quality, a Continuum of Care can accurately tell the story of the individuals and families it serves. For a full list of Data Quality definitions and terminology, see Appendix A.

Data quality can be measured by data completeness, the extent to which accurate data are entered for all data elements; and data timeliness, the amount of time that passes between data collection and entry into HMIS.

Data Completeness

HUD HMIS data standards expect no null (missing) data for required data elements, and “Don’t Know” or “Refused” responses should not exceed percentages listed below.

A missing rate of below 5 percent missing represents an ideal state and the CoC should work toward this level of data completeness for all programs.

Data Element	Applies to:	Don't Know/Refused Should Not Exceed
First Name*	All Clients	5%
Last Name*	All Clients	5%
SSN*	All Clients	5%
Date of Birth*	All Clients	5%
Race	All Clients	5%
Ethnicity	All Clients	5%
Gender	All Clients	5%
Data Element	Applies to:	Don't Know/Refused Should Not Exceed
Veteran Status	Adults Only	5%
Disabling Condition	All Clients	5%
Living Situation	Adults & HoH	5%
Zip Code of Last Permanent Address	All Clients	5%
Income and Sources (at entry)	Adults & HoH	5%
Income and Sources (at annual update)	Adults & HoH enrolled in program 365 days or more	5%
Income and Sources (at exit)	Leavers - Adults & HoH	5%
Non-Cash Benefits (at entry)	Adults & HoH	5%
Non-Cash Benefits (at annual update)	Adults & HoH enrolled in program 365 days or more	5%
Non-Cash Benefits (at exit)	Leavers - Adults & HoH	5%
Physical Disability	All Clients	5%
Developmental Disability	All Clients	5%
Chronic Health Condition	All Clients	5%
Mental Health	All Clients	5%
Substance Abuse	All Clients	5%
Domestic Violence	Adults & HoH	5%
Destination	Leavers - Adults & HoH	5%
Move-in Date	Adults & HoH enrolled in PH with move-in date	5%

*For anonymized clients the following data elements will be exempted from the 95% completeness standard: (1) Social Security Number; (2) first name; (3) last name; (4) date of birth.

** Programs serving those experiencing domestic violence will have much higher data incompleteness rates for name, social security number and date of birth, and programs serving those who may not be documented residents of this country will likely have higher rates of data incompleteness for social security numbers. These programs should focus on other areas of data quality.

Data Timeliness

In order to ensure that system-wide data is as accurate as possible, all Universal Data Elements and Program-specific Data Elements should be entered according to the following timeliness standards.

Program Type	Data Timeliness Standard – At Entry	Data Timeliness Standard – At Exit
Emergency Shelter	Within two business days of intake	Night by Night: at or before 30 calendar days after last service date. Exit date backdated to last service Entry/Exit: Within two business days of exit
Transitional Housing Permanent Supportive Housing Rapid Re-Housing Homelessness Prevention Services Only	Within two business days of intake	Within two business days of exit
Outreach	Within two business days of intake	At or before 30 calendar days after last service date. Exit date backdated to last service
Day Shelter	Within two business days of intake	At or before 90 calendar days after last service date. Exit date backdated to last service

Service Data

Some programs choose to enter services into HMIS and others are required to do so as part of funding contracts or HMIS specifications. Programs required to enter services should enter them into HMIS within two workdays.

Program Type	Service Requirement
Night-by-night Emergency Shelters	Services to track bed nights, and others as required by local funders such as the system-wide diversion related services.
Street Outreach	Services required by local funders.
Day Shelters	HMIS automatically exits clients from day shelters once they haven't received services in 90 days, so these programs must enter at least one service for clients every day they are served. Day Shelters are set up with daily "Attendance/Contact" type service for this purpose. Services may also include the system-wide diversion related services.
PATH-funded Programs	Several additional data elements and services (see PATH HMIS Manual)

Current Living Situation Assessments

Current Living Situation assessments are used to document housing status during each client interaction, enrollment, Coordinated Entry Assessment or update to Coordinated Entry Assessment for clients enrolled in Outreach, Emergency Shelter, Coordinated Entry and Services Only programs. This requirement started on October 1, 2019.

Program Type	Service Requirement
Emergency Shelters	A Current Living Situation assessment documents a client interaction when it is designed to engage the client, such as a conversation between staff and the client about the client's well-being or needs, an office visit to discuss their housing plan, or a referral to another community service.
Street Outreach	The Current Living Situation Assessment is used to document each outreach contact.

Annual Assessments

All HMIS enrollments that are active/open require an annual assessment within 30 days of the project start anniversary date each year (a 60-day window).

Data Integration

Agencies participating in data integration are expected to enter data into their own data systems in a manner that complies with the timelines and completeness expectations stated above. Agencies are required to upload all data elements into HMIS at least weekly. Coordinated Entry data entry happens directly in HMIS.

Continuous Data Quality Improvement Process

A continuous data quality improvement process facilitates the ability of the CoC to achieve statistically valid and reliable data. It sets expectations for both the community and end users for capturing reliable and valid data on persons accessing agency programs and services.

Roles & Responsibilities of Stakeholders

System Administration will provide the following services to assist agencies in correctly entering data into HMIS, and in addressing data quality issues:

- Provide end user trainings and workflow documents.
- Produce data quality reports and information on how to correct any identified data quality issues.
- Work to identify and, in conjunction with agencies, resolve data quality issues that will impact local or federal reporting.
- Provide technical assistance to agencies requesting assistance in identifying what steps need to be taken in order to correct data quality issues.
- Provide other services as contracted with Morris County and/or agency.

Working with their agency lead, agencies will take primary responsibility for entering, verifying, and correcting data entry:

- Agency staff will measure completeness by running recommended data quality reports, then distribute those reports to staff tasked with improving data quality and completeness.
- It is the responsibility of Agency management to ensure staff tasked with correcting data quality issues do so in a timely manner.

Data Quality Review

At the CoC level, data are reviewed regularly, at the dates listed below, and issues are identified for follow up.

- Quarterly - on a quarterly basis, System Administration review usage and data quality statistics and inform agencies of compliance issues.
- Reporting Preparation - approximately two months before any significant local or federal reporting deadlines, data impacting the reports are thoroughly reviewed by System Administration, with agency follow up and technical assistance as needed.

At an agency level, data quality reports should be run at least once per month throughout the year. In the weeks prior to submitting a report (e.g. APR), data quality reports may need to be run on a daily basis to ensure that any issues identified by the agency or by HMIS System Administration staff are being addressed. Agencies that review data regularly are likely to have higher levels of data quality in general and are less likely to find themselves asked to correct significant data issues under pressure of a reporting deadline.

Minimizing Data Quality Issues

How to minimize data quality issues:

- Enter client data as soon as possible. The more time that passes between collecting data and entering the data into HMIS, the greater the odds that there will be data quality issues (see section above for data timeliness standards).
- Whenever possible, consider entering data during client visits so that clients may help identify potential inaccuracies.
- Review Data Quality at least once a month and work to address any issues as soon as possible.
- Problem solve with the program and HMIS staff around any ongoing issues.

Recommended Reports for Data Review

The following reports* are recommended as a starting place for reviewing data and identifying data quality issues:

- [HMIS Data Quality Report](#) – Administration – Fiscal
- [ESG CAPER](#) – Administration – Fiscal
- [Annual Performance Review \(APR\)](#) – Administration – Fiscal
- [Morris Annual Update](#) – HMIS ReportBuilder

*Please note additional reports may be added on an annual basis.

Technical Assistance

When agencies either need assistance identifying data quality issues or have identified issues and are unsure how to proceed, there are several avenues of technical assistance available. The HMFA HMIS Helpdesk can provide initial troubleshooting assistance and will escalate issues to the System Administration team as needed. The System Administration team may also reach out to agencies directly or may reach out at the request of funders or the agency itself. Additionally, the System Administration team frequently produces guides, trainings, dashboards, and other resources to help agencies proactively identify and resolve data quality issues on their own.

Agency-Level Reporting

A number of reports and processes rely on data quality for individual program reporting to funders. Data quality issues such as: high rates of missing client data, missing or inaccurate enrollment, annual assessment and exit data can impact program funding. Data quality issues would also prevent Morris County from producing accurate systemwide reports for funders, elected officials and other constituents. The Continuous Data Quality Improvement Process described above supports accurate HMIS information for these processes, including but not limited to:

- [Annual Performance Review \(APR\)](#) - Recipients of HUD funding through the homeless grant competition are required to submit an Annual Performance Report (APR) electronically to HUD via Sage (formerly e-snaps) every operating year. The APR is required of projects funded through the HUD CoC grant program.
- [ESG CAPER](#) - Recipients of HUD funding through the Emergency Solutions Grants program are required to submit an ESG CAPER electronically to HUD via Sage (formerly e-snaps) every operating year. ESG funds are distributed through State and Local Government agencies which are responsible for submitting the CAPER, based on HMIS data for the funded projects.

- Coordinated Entry APR - The Morris County Coordinated Entry program is also a recipient of HUD funding through the homeless grant competition, and NJ211 is required to submit a special CE Annual Performance Report (APR) electronically to HUD, via Sage every operating year. The CE APR includes data from the HMIS as well as narrative questions.
- Morris County Funding and Performance Measurement Data - Local funders pull a complete set of HMIS data on an as-needed basis to meet a variety of data needs, including generating a rank order for competitive funding rounds, populating dashboards, and other performance measurement initiatives.
- Annual CoC Competition Application to HUD - The Morris County Continuum of Care competes in an annual national competition for HUD Continuum of Care Program funds. System-wide data is required as part of that application, as is aggregate data for all projects receiving Continuum of Care funding.

In preparation for each of these processes, agencies and System Administration will employ the continuous data quality improvement practices described above. Specifically:

- Agencies will:
 - follow up on data issues as identified by System Administration.
 - ensure staff understand issues related to data quality through ongoing training and support.
 - begin data quality review well in advance of reporting deadlines, focused on ensuring the correct number of clients are enrolled and there are no null values. Make corrections as needed. For example, ensure that no required information, such as veteran status, is missing.
- System Administration will:
 - conduct data quality reviews based on feedback from agencies, following up with agencies as needed.
 - provide Agencies regularly with dashboards and other information about specific data quality issues that need to be addressed.
 - provide trainings on data quality topics.

System-Level Reporting

Four additional reports are required by HUD annually using data for the entire system of HUD supported services in Morris County. The following section details timelines for all regularly scheduled reporting to HUD. These timelines help provide context and expectations for additional data quality activities throughout the year and will inform the annual work plan. To review the Data Quality & Reporting Timeline, see Appendix B.

Point In Time Count (PIT)

The Point-in-Time (PIT) count is a count of sheltered and unsheltered homeless persons on a single night in January. HUD requires that the sheltered portion be generated from HMIS data. The sheltered portion consists of clients sheltered in emergency shelter, transitional housing, and Safe Havens on this single night.

Approximate PIT date: Last Week of January

Approximate due date: April 30

Preparation and submission schedule:

- Three (3) Months before data is due to HUD:
 - System Administration: run report drafts, identify issues around utilization and/or missing data, notify agencies as needed.
 - Agencies: review data with relevant program managers and/or staff to verify accuracy of data compared to other records.

- One (1) Month before data is due to HUD:
 - System Administration: Address validation issues as needed.
- Two (2) weeks before data is due to HUD:
 - System Administration: Final data review with Morris County staff as needed.

Housing Inventory Count (HIC)

The Housing Inventory Count (HIC) is a comprehensive inventory for all housing that is dedicated to serving homeless and formerly homeless individuals and families within a CoC. All beds/units/bed vouchers should be counted.

Approximate due date: April 30

Preparation and submission schedule:

- Four (4) Months before data is due to HUD:
 - System Administration: begin program setup review, focusing on inventory and project changes throughout the year. Make corrections as needed. Work with Morris County Staff to update non-participating permanent housing project data. Update housing inventory.
 - Agencies: work with System Administration staff to address issues.
- One (1) month before data is due to HUD:
 - System Administration: enter data into HDX, address validation issues as needed.
- Two (2) weeks before data is due to HUD:
 - System Administration: Final data review with Morris County staff as needed.

System Performance Measures (SPM)

HUD System Performance Measures are a tool used to measure the local homeless response as a coordinated system rather than individual programs and funding sources. HUD uses the system-level performance information as a competitive element in its annual CoC Program Competition and to gauge the state of the homeless response system nationally.

Approximate due date: March 1

Preparation and submission schedule:

- Three (3) Months before data is due to HUD:
 - System Administration: begin system-wide data quality review. Notify agencies of issues as needed.
 - Agencies: begin data quality review, focused on ensuring the correct number of clients are enrolled and there are no null values. For example, ensure that no required information, such as veteran status, is missing. Make corrections as needed.
- Two (2) Months before data is due to HUD:
 - System Administration: run report drafts, identify issues and/or discrepancies from previous year, notify agencies as needed.
 - Agencies: review data with relevant program managers and/or staff to verify accuracy of data compared to other records. For example, ensure that veteran status data entered into Clarity is correct.
- Two (2) weeks before data is due to HUD:
 - System Administration: enter data into HDX, address validation issues as needed.
 - System Administration: Final data review with Morris County staff as needed.

Longitudinal Systems Analysis Report (LSA)

A major purpose of the LSA is to produce the Annual Homeless Assessment Report (AHAR), a HUD report to the U.S. Congress that provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The LSA data provided by CoCs contains community-level information on people and households served by continuum projects over

the course of one year. The scope of this annual report expanded significantly beginning with fiscal year 2018, and CoCs are now expected to submit much more granular data that is used to inform the written AHAR to Congress. The LSA data is submitted in the form of CSV files uploaded to HUD's Homeless Data Exchange. COVID has adjusted the timeline of this report.

HUD has now made available a strategy and analysis tool called *Stella* that helps CoCs understand how their system is performing and model an optimized system that fully addresses homelessness in their area. This tool can be useful in evaluation and planning our homeless assistance system only to the extent that LSA data is complete and accurate.

Approximate draft due date: October 30

Approximate final due date: December 31

Preparation and submission schedule:

- Quarterly throughout the year:
 - System Administration: Conduct data quality reviews one month after LSA PIT dates and notify agencies of any issues.
 - PIT dates:
 - Oct 31
 - Jan 31
 - Apr 30
 - Jul 31
- Two (2) Months before draft submission due date:
 - System Administration: upload data into HDX, address validation issues as needed
 - System Administration: begin program setup review, focusing on inventory and project changes throughout the year. Make corrections as needed, update housing inventory.
 - Agencies: begin data quality review, focused on ensuring the correct number of clients are enrolled and there are no null values. For example, ensure that no required information, such as veteran status, is missing. Make corrections as needed.
- One (1) Month before draft submission due date:
 - System Administration: run report drafts, identify issues and/or discrepancies from previous year, notify agencies as needed.
 - Agencies: review data with relevant program managers and/or staff to verify accuracy of data compared to other records. For example, ensure that veteran status data entered into Clarity is correct.
- Two (2) weeks before draft submission due date:
 - System Administration: upload data into HDX, address validation issues as needed.
 - System Administration: Final data review.

Appendix A: Definitions & Terminology

Active Clients: people who have received services from a specific project in a given date range, for inclusion into the universe of clients for a particular reporting question. The determination of active clients may vary based on the type of project for which the report question is being executed.

Age In/Out: when a program participant becomes of age to enter a system of care or exceeds the age for eligibility in a system of care.

Bed Night: a unit of service where a client is residing overnight in any type of lodging project, e.g. emergency shelter, transitional housing, or permanent housing.

Bed Utilization: an indicator of whether shelter beds are occupied on a particular night or over a period of time.

Chronic Homelessness Status:

1. A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - a. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - b. Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Client Discharge: the process of terminating a client from a program upon exit.

Client Intake: the process of collecting client information upon entrance into a program.

Community Development Block Grant (CDBG): a flexible program that provides communities with resources to address a wide range of unique community development needs.

Component: for ESG,

- Street Outreach
- Emergency Shelter
- Rapid Re-housing
- Homelessness Prevention
- HMIS

Continuum of Care (CoC): a community with a unified plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency.

Coordinated Assessment (CA): a project that standardizes how clients are evaluated and prioritized for program entry.

Covered Homeless Organization (CHO): any organization that records uses or processes data on homeless clients for an HMIS.

Data Collection: process of gathering and measuring information, in an established systemic fashion

Data Entry: direct input of information into the appropriate data fields of computerized database or spreadsheet recording system

Data Errors: any record where information is not present because the client did not know the response, refused to provide a response or the information was missing or where the response is not consistent with protocols established for the data quality of the element.

Data Quality: the reliability and validity of client-level data, including accuracy and completeness of all information collected and reported to the HMIS. It is measured by the extent to which data in the system reflects actual information in the real world. With good data quality, a Continuum of Care can accurately tell the story of the individuals and families it serves.

Data Quality Monitoring Plan: a set of procedures that outlines a regular, on-going process for analyzing and reporting on the reliability and validity of the data entered into the HMIS at both the program and aggregate system levels. A data quality monitoring plan is the primary tool for tracking and generating information necessary to identify areas for data quality improvement.

Data Quality Plan: a community-level document that facilitates the ability of a CoC to achieve statistically valid and reliable data. A data quality plan is developed by the HMIS Lead Agency with input from community stakeholders and is formally adopted by the CoC.

Data Quality Standards: regulations issued by HUD describing the requirements for implementing HMIS, including who needs to participate in HMIS, what data to collect and how to protect client information.

Day Shelter: a project that provides temporary shelter for the homeless in general or specific subpopulations of the homeless that does not require occupants to sign leases or occupancy agreements and allows clients to stay for the duration of the hours of operation.

Digital certificates: an attachment to an electronic message used for security purposes. The most common use of a digital certificate is to verify that the user sending a message is who he or she claims to be and to provide the receiver with the means to encode a reply.

Discharge Criteria: Reason for discharge. Potential options in HMIS:

Left for a housing opportunity before completing program: Client did not achieve service plan goals but did achieve stable housing

Completed program: Client achieved service plan goals and a successful completion.

Non-payment of rent/occupancy charge: Client did not comply with housing-specific financial obligations.

Non-compliant with project: Client did not comply with program requirements as per HUD

Criminal activity/destruction of property: Client participated in an illegal activity that prohibits further
Reached maximum time allowed in project

Needs could not be met by project: Project is not appropriate for client.

Disagreement with rules/persons: Client did not comply with agency rules as outlined in the Housing Contract or agency-specific rules.

Death: Eligible client is deceased.

Other: Do not use this selection. Seek guidance from funder to determine best discharge criterion.

Unknown/Disappeared: 180 days without contact after two written attempts at contact by Assigned Case Manager. DV agencies or situations in which clients have an unannounced, voluntary exit will be exempt from the written attempt requirement.

Emergency Shelter: a project that provides funds to rehabilitate and operate emergency shelters and transitional shelters, provide essential social services and prevent homelessness.

Emergency Solutions Grant (ESG): a program that provides funding to engage homeless individuals and families living on the street, improve the number and quality of emergency shelters for homeless individuals and families, help operate shelters, provide essential services to shelter residents, rapidly re-house homeless individuals and families and prevent families and individuals from becoming homeless.

Face Sheet: In HMIS, a summary of key information, including program enrollment history and basic demographic information.

Funders: HUD: CoC; HUD: ESG; HUD: HOPWA; HUD: HUD-VASH; HUD: RHSAP; HHS: PATH; HHS: RHY; VA: SSVF

Health Insurance Portability and Accountability Act (HIPAA): US law designed to provide privacy standards to protect patients' medical records and other health information provided to health plans, doctors, hospitals and other health care providers. Developed by the Department of Health and Human Services, these standards provide patients access to their medical records and give them more control over how their personal health information is used and disclosed.

Homeless Management Information Systems (HMIS): computerized data collection tool designed to capture client-level information over time on the characteristics and service needs of men, women and children experiencing homelessness.

Homeless Prevention: a project that provides rental assistance and housing relocation and stabilization services to individuals and families at risk of homelessness.

HMIS Data Elements:

- **Program Descriptor Data Elements:** data elements recorded about each project in the CoC, regardless of whether the project participates in the HMIS.
- **Universal Data Elements:** Baseline data collection that is required for all programs reporting data into the HMIS.
- **Program Specific Data Elements:** data provided about the characteristics of clients, the services that are provided, and client outcomes. These data elements must be collected from all clients served by programs that are required to report this information to HUD.
- **Annual Performance Report Program Specific Data Elements:** the subset of HUD's Program-specific Data Elements required to complete the SHP Annual Performance Report (APR)

HMIS Lead Organization: the central organizations that will house those individuals who will be directly involved in implementing and providing operational, training, technical assistance and technical support to participating agencies

HMIS User: any distinct person who has the ability to log into the HMIS for System Administration, data entry, resource viewing, or reporting purposes.

HMIS Reports:

- **Annual Homeless Assessment Report (AHAR):** annual report to Congress on the extent and nature of homelessness.
- **Annual Performance Report (APR):** report that tracks program progress and accomplishments in HUD's competitive homeless assistance programs. The APR provides the grantee and HUD with information necessary to assess each grantee's performance.
- **HMIS Data Quality Report:** a report that allows programs to view records with null/missing and unknown/don't know/refused values.

- **Quarterly Performance Report (QPR)**: a reporting tool HUD uses to track progress and accomplishments of HPRP funded programs on a quarterly basis.

Housing Contract: Document that is signed by the provider and the client that outlines program rules and potential reasons for discharge and determines what goals and objectives must be achieved to determine a successful program completion.

Housing Opportunities for Persons with AIDS (HOPWA): established by HUD to address the specific needs of persons living with HIV/AIDS and their families.

HUD-Veterans Affairs Supportive Housing Program (HUD-VASH): program that distributes housing vouchers to assist homeless veterans and their families afford decent, safe and sanitary housing.

Inactive Records: clients leave or disappear without an exit after 90 days without contact.

Inferred consent: once clients receive an oral explanation of HMIS, consent is assumed for data entry into HMIS. The client must be a person of age and in possession of his/her faculties.

Informed consent: a client is informed of options of participating in an HMIS system and then specifically asked to consent. The client must be a person of age and in possession of his/her faculties.

Performance measures: a process that systematically evaluates whether your program's efforts are making an impact on the clients you are serving.

Permanent Supportive Housing (PH): long-term community-based housing that has supportive services for homeless persons with disabilities.

Personal Protected Information (PPI): information that can be used to uniquely identify, contact or locate a single person, or may enable disclosure of personal information.

Point in Time Inventory: a snapshot of the homeless population taken on a given day. It is required that all CoC applicants complete a sheltered count, clients in emergency shelter, transitional housing and safe haven beds and an unsheltered/street count. The count occurs in the last week of January and must be completed every year for the sheltered population and every other year for the unsheltered population.

Privacy Notice: a written, public statement of an agency's privacy practices. A notice informs clients of how personal information is used and disclosed.

Project: A project is identified by the CoC as part of its service system, in which an individual client or family is enrolled. A project further defined as a "lodging project" provides overnight accommodations and meets the needs of people who are homeless. A "services project" does not provide lodging and meets specific needs of people who are homeless or at risk of homelessness.

Program: A program refers to the federal funding source used to fund a project. One project may have simply one funding source or multiple sources.

Project Types: for CoC,

- Emergency Shelter
- Transitional Housing
- Permanent Supportive Housing (Housing only; Housing with Services; Rapid Re-Housing)
- Street Outreach

- Safe Haven
- Day Shelter
- Homelessness Prevention
- Coordinated Assessment

Projects for Assistance in Transition from Homelessness (PATH): program that provides a range of support services and housing services to people with serious mental illness experiencing homelessness.

Public Key Infrastructure (PKI): an arrangement that binds public keys (used in digital certificates and contain information that a sender can use to encrypt information such that only a particular key can read) with respective user identities by means of a certificate authority.

Rapid Re-housing: a component that is designed to move homeless people quickly to permanent housing through housing relocation and stabilization services and short and/or medium term rental assistance.

Report Date Range: The start and end date of a specific reporting period. Because many reports can be executed for a date range other than one year, “report date range” is more flexible than the term “operating year” which is typically used for a HUD APR. The terms [report start date] and [report end date] are used throughout this document to refer to the user-supplied dates for a specific instance of a report execution.

Runaway and Homeless Youth (RHY): a program that provides housing and supportive services to persons under 18 years of age who absents him or herself from home or place of legal residence without the permission of his or her family or an individual who is less than age 21 for whom it is not possible to live in a safe environment with a relative and who has no other safe alternative living arrangement.

Rural Housing Stability Assistance Program (RHSAP): a program that provides re-housing or improves the housing situations of individuals and families who are homeless or in the worst housing situations in the geographic area; stabilizes the housing of individuals and families who are in imminent danger of losing housing; and improves the ability of the lowest-income residents of the community to afford stable housing.

Safe Haven: a form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services.

Service Plan: Tool that is used to identify areas for change, set goals and plan activities and services to meet those goals. Tools are agency and program-specific.

Shelter Plus Care: a program that provides grants for rental assistance for homeless persons with disabilities through four component programs (tenant, sponsor, project and single room occupancy (SRO) rental assistance).

Site Administrator: the program user at a funded agency who is responsible for providing a single point of communication between the end users and the lead agency, training end users, providing support for the generation of agency reports, managing agency user licenses, monitoring compliance with standards of client confidentiality and ethical data collection, entry and retrieval.

System Administration: collaboration between co-chairs, data manager, HMFA, etc.

Social Service for the Homeless (SSH): program that provides assistance to New Jersey residents who are at risk of homelessness, but are ineligible for Temporary Assistance for Needy Families welfare, General Assistance welfare or Supplemental Security Income. SSH can pay for emergency food or a motel or shelter stay for a limited amount of time. It can also provide rental, mortgage, utility and security deposit assistance. This program, which operates on a 24-hour emergency basis, also includes referral services and limited case management.

Street Outreach: a project that provides case management services to individuals and families who are living on the streets or other places not meant for human habitation and are unwilling or unable to access services in an emergency shelter.

Supportive Housing Program (SHP): a program that provides housing, including housing units and group quarters, that has a supportive environment and includes a planned service component.

Supportive Services for Veteran Families (SSVF): program to assist very low-income Veteran families residing in or transitioning to permanent housing through the provision of a range of supportive services to eligible Veteran families designed to promote housing stability.

Supportive Services Only (SSO): project that addresses the service needs of homeless persons with no housing component.

Transitional Housing (TH): a project that has its purpose facilitating the movement of homeless individuals and families to permanent housing with a reasonable amount of time.

Unaccompanied Youth: minors not in the physical custody of a parent or guardian, including those living in adequate housing such as shelters, cars, or on the streets. Also includes those who have been denied housing by their families and school-age unwed mothers who have no housing of their own.

Unduplicated Count: the number of people who are homeless within a specified location and time period.

Universal Data Elements: data required to be collected from all clients serviced by homeless assistance programs using HMIS and used for HMIS reporting.

Written consent: embodies the element of informed consent in a written form when a client completes and signs a document consenting to an understanding of the options and risks of participating or sharing data in an HMIS system. This signed document is then kept on file at the agency.

Appendix B: Data Quality & Reporting Timeline

Unsheltered Count/SPMs

PIT/HIC

LSA

SPMs

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
System Administration: utilization & inventory review for PIT/HIC											
Agencies: HIC inventory validation											
	Agencies: PIT data verification										
			System Administration: finalize HDX data								
System Administration: SPM data quality review											System Administration: SPMs data quality review
Agencies: review/correct data for SPMs											Agencies: review/correct for SPMs
	System Administration: enter & validate data in HDX										
							System Administration: review programs and inventory; run and upload draft LSA to HDX 2.0				
							Agencies: review/correct for LSA				
								System Administration: run/upload draft LSA			
								System Administration: upload & validate in HDX 2.0			
											HUD review & validate
Qtrly Quality Review			Qtrly Quality Review			Qtrly Quality Review			Qtrly Quality Review		

Monthly Data Pulls by Agency

Appendix C: Provider Software Requirements

The County of Morris Continuum of Care contracts with a software provider that acts as the Lead Agency whose responsibilities are to manage and administer all HMIS operations and activities, including the following as outlined in the CoC-HMIS MOU:

Governance and Reporting

- Provide staffing for operation of the HMIS project
- Create system to generate data quality reports and analysis for review by the CoC and for submission to HUD
- Provide, at least annually, a point-in-time unduplicated count of clients served in the HMIS (for sheltered PIT Count, AHAR, APR Pulse reports and/or other reports as required)
- Create annual report of unduplicated count of clients served in the HMIS over the course of one year (for AHAR)
- Create reports, at least annually, that can account for the lodging units in the HMIS (for HIC, AHAR, and Pulse reports, or as required) and an unduplicated count of newly homeless clients
- Ensure the consistent contribution of data that meets all HUD established data standards, at minimum, every program operating with funds authorized by the McKinney-Vento Act as amended by the HEARTH Act, including ESG funds
- Work with the CoC to facilitate participation by all homeless prevention and assistance programs and other mainstream programs serving homeless people to participate in the HMIS
- Facilitate the Collaborative Advisory Council Meetings
- Attend local CoC and Data Committee meetings as often as possible
- Determine the length of time that records must be maintained for inspection and monitoring purposes pursuant to HUD standards and ensure compliance with these standards
- Respond to CoC Steering and Data Management Committee directives
- Provide data needed to inform CoC's progress toward achieving its Strategic Plan goals.

Planning and Policy Development

- Manage and maintain mechanisms for soliciting, collecting and analyzing feedback from end users, CHO HMIS Site Administrators, CHO Program Managers, CHO Executive Directives and homeless persons
- Identify general milestones for project management, including training and expanding system functionality, and ensure that the HMIS Action Plan is carried out and regularly reviewed
- Develop and, upon adoption by the CoC Advisory Council Members, implement written policies and procedures for the operation of the HMIS Project and HMIS Data Warehouse, including requirements and standards for any CHO, and provide for the regular update of these procedures as required by changes to policy
- Provide assistance to the COC adopted and implemented data quality plan consistent with requirements established by HUD and review and update this plan annually and upon update to HUD regulations, notice or guidance
- Develop and, upon adoption by the CoC Advisory Council Members, implement a security plan consistent with requirements established by HUD, and review and update this plan annually and upon update to HUD regulations or guidance
- Develop and, upon adoption by the CoC Advisory Council Members, implement a disaster recovery plan consistent with requirements established by HUD, and review and update this plan annually according to the most current HUD regulations or guidance
- Develop and, upon adoption by the CoC Advisory Council Members, implement a privacy policy specifying data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description, access

and correction standards; accountability standards; and process and protections for victims of domestic violence, dating violence, sexual assault, and stalking included in the data warehouse

- Ensure privacy protection in project administration
- Develop and, upon approval by the CoC Advisory Council Members, execute HMIS Participation Agreements with each CHO, including
 - o Obligations and authority of the HMIS Lead and the CHO
 - o Protocols for participation in HMIS Project
 - o Requirements of the policies and procedures by which the CHO must abide
 - o Sanctions for violating the HMIS Participation Agreement
 - o Terms of sharing and processing Protected Identifying Information between the HMIS Lead and the CHO
 - o CHO's annual participation fees to be paid to the Lead HMIS Agency

Grant Administration

- Prepare and submit NOFA Project Applications for HUD's HMIS grants for those counties that allowed grant funds to the Lead HMIS Agency via E-SNAPS
- Create annual budgets outlining the most efficient resource allocation to meet HMIS Project requirements
- Support HMIS by funding eligible HMIS activities with eligible matching sources to serve as the HUD-required match
- Manage spending for both HUD grants and matching funds
- Manage the reimbursement payment process and maintain records of all reimbursement documents, funds, approvals, denials, and other required or relevant records
- Ensure accurate and regularly (quarterly, at minimum) draw down of HUD grant funding
- Complete and submit APR for HUD grants

System Administration

- Oversee the day-to-day administration of the HMIS system
- Manage contracts for FTS, which includes training for CHOs and DHS staff, and licensing of HMIS Server
- Ensure HMIS software meets the minimum data and technical functionality requirements established by HUD in rules or notices, including un-duplication, data collection, maintenance of historical data, reporting (including HUD-required reports, data quality and audit reports), and any other requirements established by HUD or state partners (Department of Community Affairs & Department of Human Services)
- Ensure HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data and the maintenance of privacy, security, and confidentiality protections
- Develop standard reports and queries of HMIS data (e.g. data quality report, CoC quarterly report, etc.)
- Oversee and relate small and large scale changes to the HMIS software through coordination with Staff
- Maintain continuous End User trainings and CHO User Group meetings to discuss implementation of policies and procedures and data entry and upload processes when and if feasible
- Update contact list of HMIS Administrators for all CHOs in conjunction
- Maintain original copies of all CHO's Participation Agreements and other required documents the end users must sign in a fire proof cabinet
- Maintain original copies of all CoC's MOU agreements in a fire proof cabinet

End-User Administration

- Provide or coordinate technical assistance and support structure
- Document technical issues experiences by providers
- Develop and deliver a comprehensive training curriculum and protocol, including accompanying tools and resources that:

- Includes, but is not limited to, data entry requirements and techniques, client confidentiality and privacy requirements, data security and data quality
- Requires all CHO Site Administrators to participate in trainings, it is the responsibility of the CHO Site Administrator to ensure end users at the CHO receive training and HMIS information
- Is encouraged for HMIS end users, including intake staff, data entry staff and reporting staff at all CHOs
- Is offered, at a minimum, monthly
- Is offered in a manner that assures every new end user completes training prior to or shortly after collecting any HMIS data or using the HMIS
- Is conducted in a manner that assures every current end user completes a training update at least annually

Data Quality and Compliance Monitoring

- Consistent with the CoC data quality plan, support the data quality plan by developing report tools needed
- Consistent with the CoC data quality plan, develop reporting tools to allow monitoring of established data quality benchmarks for CHOs, including bed coverage rates, service-volume coverage rates, missing/unknown value rates, timeliness criteria, and consistency with CoC program models, and timeliness
- Consistent with the CoC data quality plan, provide quarterly reports on HMIS participation rates, data quality and other analyses to the CoC and Data Management Committee
- Monitor compliance by all CHOs with HMIS participation requirements, policies and procedures, privacy standards, security requirements, and data quality standards through an annual review per the process outlined in the Agency Participation Agreement and approved by the CoC Advisory Council Members

Appendix D: Site Administrator Role and Responsibilities

1. Act as liaison between agency, HMIS technical staff and Continuum of Care mechanism
 - Attend Data Quality Subcommittee and designate agency backup
 - Attend Regional General, Site Administrator and Reports Training within one year of Site Administrator designation
 - Attend mandatory trainings as required by CoC Executive Committee
2. Coordinate Agency system setup
3. Coordinate Agency Users
 - Set up user logins and passwords
 - Assign user access levels
 - Terminate user access
 - Ensure agency users receive initial and ongoing training
 - Regional General and Services Trainings
 - Webinars
 - Review security requirements, policies and procedures with users
4. Quality Assurance
 - Perform agency level audits
 - Create and adhere to data quality improvement plans
 - Monitor and correct data errors and missing data elements
 - Run agency level reports and provide reporting statistics to county representatives on request
 - Utilize information learned via trainings, meetings and HUDexchange.info to enhance program quality
 - Complete AHAR quarterly, at minimum, and correct all data errors
 - Develop action plans to address issues with agency noncompliance to Data Quality Standard Operating Procedures

Appendix E: Security and Centralized Data

Firewall

Purpose: Firewalls control the traffic between the internal and external networks and are the core of a strong network security policy.

Criteria: Where electronic equipment is used to capture, process or store data and is accessible via a direct or indirect internet connection, a Network Firewall appropriately installed, configured and maintained is required. By default all inbound connections are blocked and should be closed for incoming traffic and only opened as and when required (i.e. email and web traffic).

Applicability: Applicable to all CoC funded agencies. Policy to be enforced by IT System Administrator or other designated staff under the guidance of CHO senior management. Privileges to modify the functionality, connectivity, and services supported by firewalls must be restricted to a few technically-trained individuals with a business need for these same privileges.

Frequency: Regular maintenance, scheduled to be determined by each agency, includes backup of firewall configuration installation of manufacturer updates that include bug fixes and new features that can help mitigate new types of threats. Firewall policy to be reviewed annually.

Use: Where electronic equipment is used to capture, process or store data and is accessible via a direct or indirect Internet connection, a Network Firewall appropriately configured and maintained is required. A spreadsheet should be kept to track what ports, when it's opened, who asked for it and why.

Virus and Spyware Protection

Purpose: To ensure that all CHOs are in compliance with one standard for virus and spyware protection in order to protect the integrity and confidentiality of PPI.

Criteria: All agency owned and/or leased workstations shall be equipped with commercially available antivirus protection software.

Applicability: Applicable to workstations owned and/or leased by CoC funded agencies and all workstations utilized for business purposes that are owned/leased by CHO staff.

Frequency: Virus protection software must include automated scanning of files as they are accessed by users on the system where the HMIS application is housed every seven days at minimum. Each CHO must regularly update virus definitions from the software vendor.

Use: All CHO file servers and pertinent workstations.

Digital Certificate

Purpose: Digital signatures are used in lieu of handwritten signatures to ensure a document or message has not been tampered with and to verify it was created by an entity.

Criteria: A Digital (or SSL) Certificate is a computer file (or small piece of code) that uses a digital signature to bind together a public key with an identity. It has two specific functions:

- Contains information about the authenticity of certain details regarding the identity of a person, business or website, which it will display to visitors on your website when they click on the browser's padlock symbol or trust mark

- Enables encryption, which means that the sensitive information exchanged via the website cannot be intercepted and read by anyone other than the intended recipient.

Applicability: Applicable to HMIS vendor and recommended for any agency using an alternate or additional information management system. Purchase of Digital SSL Certificate to be facilitated and policy to be enforced by IT System Administrator or other designated staff under the guidance of CHO Senior Management. SSL Certificate may be purchased directly from your web hosting service provider, who install and configure the certificate as part of the purchase.

Frequency: Purchase, installation and configuration is a one-time occurrence provided by the CHO web hosting company.

Use: Where electronic equipment is used to capture, process or store data and is accessible via a direct or indirect Internet connection, a Digital Certificate appropriately installed, configured and maintained is required.

Forms: CHO Purchase Order; Digital SSL Certificate validation form or email validation from Web Host Provider.

User Authentication

Purpose: For Covered Homeless Organizations (CHOs) to secure Housing Management Information System (HMIS) with, at minimum, a user authentication system consisting of a username and a password.

Criteria: CHOs shall strive to verify the identity and authority of each person or entity seeking access to Protected Personal Information (PPI) through the HMIS to ensure only authorized individuals access PPI. All CHOs are responsible for taking the appropriate steps, as outlined below, to select and secure their passwords.

- **General Password Construction:** Passwords must be at least eight characters long and meet current HMIS standards.
- **Password Protection Standards:** Users must follow the following guidelines in order to protect password information:
 - o Do not write username and password on paper stored in a public place or within proximity to computer
 - o Do not store username and/or passwords in any computer file system without encryption
 - o Do not talk about a password in front of others.
 - o Do not share passwords with anyone, including co-workers.
- **Network Protection:** CHOs must ensure that individual users may not be able to log onto more than one workstation at a time, or be able to log on to the network at more than one location at a time.

Applicability: Applicable to CHO senior management, who is responsible for drafting, updating and annual review of the Security Procedure. The CHO's site HMIS Administrator is responsible for the implementation, coordination and administration of the Security Procedure.

Frequency: At initial user setup, upon receipt of user change request form and user termination.

Use: CHO facilities and workstations.

Forms: HMIS – New User Setup/Termination Form; HMIS – User Change Request Form; HMIS – Confidentiality Agreement Form

Electronic Data Transmission

Purpose: To ensure that all CHOs are in compliance with one standard for the electronic transmission of data in order to protect the integrity and confidentiality of PPI.

Criteria: Unencrypted data may be transmitted between two systems over a secure direct connection that can only be accessed by users who have been authenticated on at least one of systems involved and does not utilize any tertiary systems to transmit the data.

If data is to be transmitted electronically over the internet, publicly accessible networks or phone lines, it must be encrypted or sent via a secure data transfer application.

Applicability: Applicable to all CHO staff with access to PPI.

Frequency: Whenever data is shared between users or systems.

Use: Inter-agency communication is to be used throughout the process of data transfer to ensure efficient, secure and direct electronic data transmission. This communication and electronic data transfer is to be monitored and evaluated by Site Administrators at respective agencies.

Physical Access

Purpose: For Covered Homeless Organizations (CHOs) to secure Homeless Management Information System (HMIS) with Physical Security, which is defined as: the protection of personnel, hardware, software, networks and data from theft, vandalism, natural disaster, manmade catastrophes, and accidental damage.

Physical access refers to actual hands-on, on-site access to computer and network hardware, or other parts of a hardware installation. Key issues with physical access revolve around security and authenticated use of hardware environments, from typical workstation cubicles to server rooms and other places where unauthorized physical access could lead to security risks. Physical security is a vital part of any security plan and is fundamental to all security efforts

Criteria: CHOs shall put a procedure in place to protect the company's information assets for computer workstations and hard copy documentation the includes the following components:

- Access to computers in public areas, that are used to collect and store HMIS data, will be staffed at all times.
- Offices where computers are used to collect and store HMIS data will be kept locked when staff is not in the office.
- When computers are not in use, steps will be taken to ensure that the computers and data are secure and not accessible by unauthorized individuals.
 - o After a short amount of time (1-5 minutes), computers should automatically turn on a password protected screen saver when the workstation is temporarily not in use.
 - o If staff will be gone for an extended period of time (greater than 15 minutes), staff should log off the data entry system.
- CHO will have a procedure in place for retiring computer assets which includes:
 - o using manufacturer recommended software for a security wipe of data and reformatting the disc or erasing or reformatting the hard drive for computers that will be redeployed
 - o Physically destroying hard drive of computers that will be permanently retired
- Servers will be kept in locked cabinet, cage or office.
- Any paper or other hard copy containing personal protected information (PPI) that is either generated by or for HMIS, including, but not limited to reports, data entry forms and signed consent forms must be secured in areas that are not publicly accessible.
- When documentation that contains PPI is in an area accessible to the public, it must be supervised by CHO staff.
- Written information, specifically pertaining to user access, must not be stored or displayed in any publicly accessible location.

Applicability: Applicable to CHO senior management who is responsible for drafting, updating and annual review of the Security Procedure. The CHO's site HMIS Administrator is responsible for the implementation, coordination and administration of the Security Procedure.

Frequency: All CHO staff should be vigilant regarding the ongoing security of the facility, equipment and physical data.

Use: All CHO facilities and workstations.

Mobile Workstations

Purpose: To ensure that all CHOs are in compliance with one standard to protect the integrity and confidentiality of personal protected information (PPI) when staff are working in mobile stations.

Criteria:

- CHO's will use only authorized mobile devices with encryption to store PPI.
- Mobile computers follow the same security procedures as stationary workstations.
- CHO's will not use personal devices to view or transmit PPI. Public areas that are used to collect and store HMIS data will be staffed at all times.
- CHO staff members who travel offsite will keep electronic equipment, portable devices and papers that contain PPI in their possession.
- CHO staff members who travel offsite will follow agency security procedures when removing official records and will obtain permission from appropriate supervisors to transport, transmit, remotely access or download sensitive information.
- CHO staff members will remotely access sensitive information only by using authorized methods.
- CHO staff members should only use password protected Wi-Fi access when utilizing mobile workstations.

Applicability: IT Administrators within each CHO will be responsible for ensuring policy adherence. All levels of staff will comply with this policy. Site Administrators under the guidance of CHO Senior Management are responsible for training staff.

Frequency: This protocol applies to all mobile workstations and personal mobile equipment at all times.

Use: CHO mobile workstations and equipment and user personal devices.