



COUNTY OF ORANGE
OFFICE OF CARE
COORDINATION

Policies, Procedures and Standards
Committee Meeting
May 13, 2025

Welcome and Introductions

Nishtha Mohendra, Chair

Public Comments

Consent Calendar

Consent Calendar

Recommended Action

1. Approve the PPS Committee Meeting Minutes from February 11, 2025.

Business Calendar

**Homeless Management Information System
(HMIS) Policies and Procedures
Recommended Changes**

Erin DeRycke, Director, Data Analytics,
2-1-1 Orange County (211OC),
Orange County United Way

HMIS Policies and Procedures Updates

May 2025



Background

- The HMIS Policies and Procedures was approved by the CoC Board in August 2024, with the exception of the Client Record Request policy
- The CoC Board requested additional research be done to determine if the Client Record Request policy should be updated to allow clients to request their full record in HMIS
- Additional policies and forms are being updated to provide clarity, reflect new guidance, or reflect new internal processes

Process

- 211OC met with the HMIS Working Group in November to discuss revisions, and a user feedback period occurred from November 15th – December 1st
- Proposed changes to the Policies and Procedures were presented to the Lived Experience Advisory Committee (LEAC) on December 4th
- Progress on the revisions were presented to the Policies, Procedures, and Standards Committee (PPS) on December 10th
- Client Record Request Survey feedback period: 1/14 – 1/31
 - 211OC released a survey to understand how agencies are currently handling record requests, if agencies have their own internal policies, and how many requests agencies are receiving
- Updated Policies and Procedures approved by the LEAC on April 2nd

Working Group Feedback

- Concern around liability for agencies if case notes are released to clients
- More accessible data could improve client relationship
- Users would like more guidance around case notes data entry and how to talk to clients about their data; suggested limiting case notes in record requests to those entered after training was completed
- Sharing location data may be a safety concern if the client doesn't properly dispose of that information
- Full HMIS record may be too much information for clients
 - Allow clients to select what data they would like to see

User Feedback

- Edit Client Consent Form to change “agencies contributing data to HMIS” to “agencies with access to HMIS”
- More guidance for agencies on how to process client record requests

December LEAC Feedback

- Client Record Requests should include all data in the client's file
- The process to request records should be a single step, and streamlined to make the process easy for the client
- Clients need to be made aware that it's possible to request their HMIS record
- Service Providers need to be trained on how to help the client get the information they want

PPS Committee Feedback

- Train staff to assist clients with simple requests that don't require their full HMIS record
- Find out how agencies are currently handling record requests, and how many they are receiving
- Process should be client-focused

Client Record Request Survey Feedback

- Most agencies are sending HMIS record requests to the HMIS team
- Some agencies provide clients with copies of their paper files if asked
- Agencies receive very few HMIS client record requests
- The client record request process should be as efficient as possible

April LEAC Questions

- Does the change in policy mean that data requests will no longer need to be approved by the CoC Board?
- What if an agency denies a client's record request?
- How is client data entered into HMIS?
- Is HMIS data sold to outside entities?

Client Record Request Considerations

- Pulling a client's full HMIS record is time-consuming for HMIS staff (2 hours or more per request)
 - If many requests are received at the same time, or records being requested are large, the team may need to limit hours that can be spent on these requests each month
- Since September 2020, all users have completed training on best practices for case notes data entry
- Agencies are not able to pull a client's complete HMIS record due to permission settings
- Legal Council suggested a review of each agency's liability insurance if case notes are being shared with clients

Client Record Request Policy Changes since December Meeting

- Policy is no longer two steps for a client to request their complete record
- Requests can be submitted to an agency currently participating in HMIS, not just agencies the client has been served by
- Agencies can provide clients with information from their HMIS record without submitting a request to the HMIS Lead
- Case notes are released at the discretion of the agency that entered them

Update: Client Record Requests

- Clients requesting specific information in their HMIS record may work directly with an agency participating in HMIS
 - Case notes may be shared by the agency that entered them at the agency's discretion
 - Agencies can only provide information that they have access to view in HMIS
- Clients that want to receive their full HMIS record may submit a record request by contacting a Service Provider currently participating in HMIS
 - Clients will be able to select the types of data they would like to review
 - Case notes are not included in the full record request submitted to the HMIS Lead
- Clients may request edits to data they contributed to HMIS
 - Clients that wish to edit data for a specific project must contact the agency directly to request the edit
 - If a project is closed or the agency administering the project is no longer participating in HMIS, no edits can be made.
- Data contributed by a participating agency (enrollment history, services, case notes, etc.) cannot be edited at a Client's request

Client Record Request Form

Client Record Requests DRAFT

This form must be submitted by an Agency Administrator at an agency currently participating in OC HMIS, and should only be used when a client wants to access data in their HMIS record the agency submitting the form doesn't have access to.

Prior to submitting this form, talk with the client to determine the specific data they want to receive. Review the [Client Record Requests](#) knowledge base article to determine whether the request can be fulfilled without submitting this form.

Clients do not need to provide a reason for wanting their HMIS record.

Agency Name

Agency Administrator Name

Agency Administrator Email Address

Agency Administrator Phone Number

Client's HMIS Unique ID

What data would the client like to see from their HMIS record? *

- Client Record Request Dashboard - Demographics, Release of Information, Enrollment History, and Uploaded Documents
- Client responses to assessments completed at entry, exit, or at anytime during their enrollment
- Data collected by a Service Provider regarding the client, including Services, Public Alerts, and Locations
- Coordinated Entry data, including status, history, and events

Only data entered in the HMIS record for the client ID above will be provided.

Update: Data Use & Disclosure

- Clarify that data may be used or disclosed without client consent for system administration, technical support, program compliance, analytical use, and other purposes as outlined in the Privacy Notice or required by law

Update: Data Release

- Clarify that client data will not be shared without consent except for uses and disclosures outlined in the Policies and Procedures or otherwise required by law
- The HMIS Lead, CoC Collaborative Applicant, CES Lead, and CES Administrators may release aggregate data about the CoC without organization or CoC Board permission

Update: Data Integration

- Agencies must be approved for HMIS access before submitting any data integration requests
- Agencies requesting to integrate their own HMIS data with a case management software will be reviewed and approved by the HMIS Lead.
- Agencies requesting to integrate HMIS data from other agencies that they do not manage will be reviewed and approved by the CoC Board.
- Requests to integrate Coordinated Entry System data will be reviewed and approved by the HMIS Lead and the CES Lead
- Update language around new API process
- Data normalization tasks added

Update: Client Consent

- Clarify that the client is consenting for their data to be shared with other service providers/organizations in HMIS
- Signing the consent form also means that the client's data may be included in data requests approved by the CoC Board

Update: Grievance Form

- Refer clients to OCC for grievances related to the Coordinated Entry System
- Provide examples of HMIS-related grievances

Update: Privacy Notice

- Clarifies that there are situations where client data may be disclosed without the client's consent
- Clients that submit a Client Record Request will have their full record sent to the agency that submitted the request on their behalf

Next Steps

- Approval by PPS Committee
- Approval by CoC Board (*pending PPS approval*)
- Presentation of Policies and Procedures revisions at the HMIS User Meeting (*pending CoC Board approval*)

**United
Way**



Orange County United Way

Consent Calendar

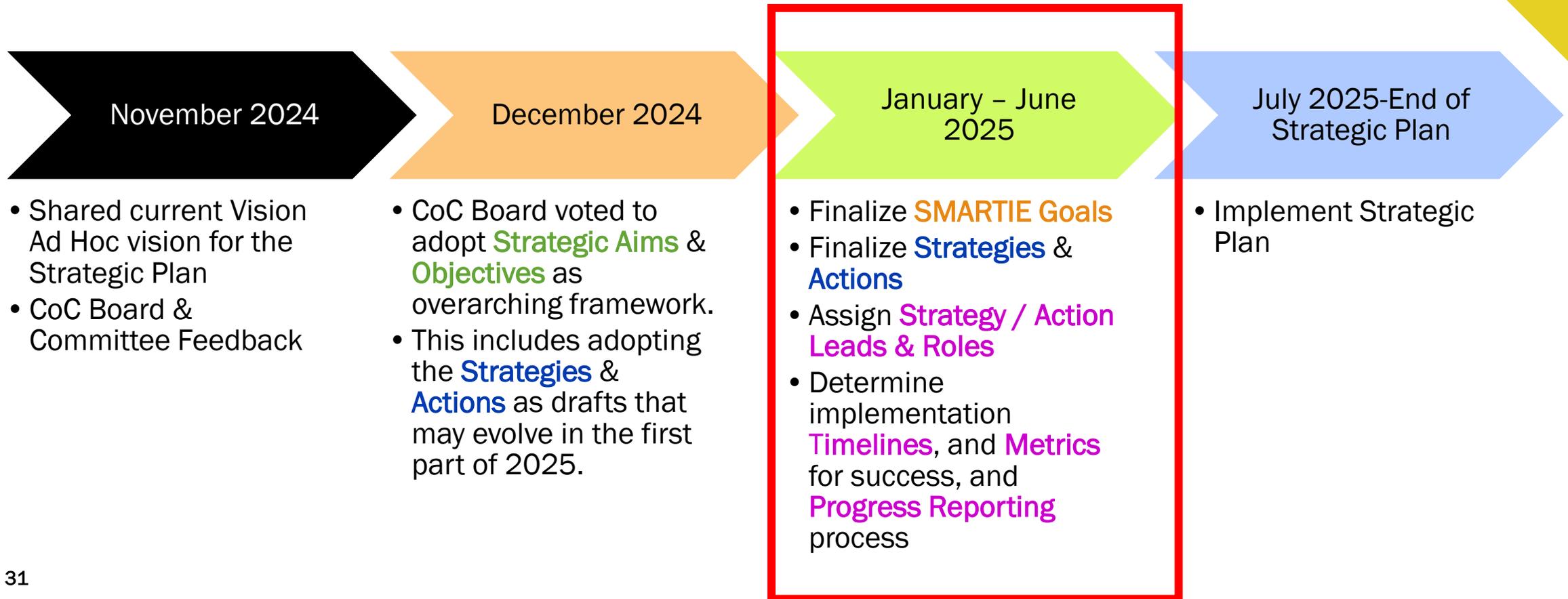
Recommended Action

- a. Approve the recommended revisions to the HMIS Policies and Procedures, inclusive of the Client Record Requests, Data Use and Disclosure, Data Integration, and Data Release policies, as well as updates to the Client Consent Form, Grievance Form, and Privacy Notice, as recommend by the Orange County HMIS Policies and Procedures Working Group and Lived Experience Advisory Committee, for review and approval by the CoC Board.

CoC Strategic Plan

**Nishtha Mohendra, Chair and
Sarah Jones, CoC Manager, Office of
Care Coordination**

Strategic Plan Structure: Feedback & Implementation Timeline



Business Calendar – Item #2

CoC Strategic Plan Working Session Recap

- On Wednesday, April 30, 2025, the CoC Board, CoC Vision Ad Hoc, and the Office of Care Coordination collaborated with AC Strategies consultant Aubrey Sitler to facilitate a working session focused on the actions outlined in the CoC Strategic Plan.
- Additional analysis of the working session is needed to ensure the appropriate next steps are in place before implementation begins in July 2025, however, current assigned strategies and actions for the PPS Committee are outlined here.
- It is important to note, strategies and actions within the CoC Strategic Plan are still in working draft form.

Business Calendar – Item #2

CoC Strategic Plan Working Session Recap

Objective	Strategy	Action
1A: Embed evidence-based practices across the CoC	Collaborate with direct service providers to create streamlined and trauma-informed documentation and processes	Perform an audit of CoC programs (legal and policy review) to identify the essential documentation required for each program and eliminate unnecessary paperwork or steps to simplify the process for both program participants and staff
1A: Embed evidence-based practices across the CoC	Collaborate with direct service providers to create streamlined and trauma-informed documentation and processes	Adopt a universal documentation system to standardize the required paperwork for accessing programs and services across the board.
1A: Embed evidence-based practices across the CoC	Collaborate with direct service providers to implement a people-centered, holistic, trauma-informed, case management model standard	Co-create guest bill of rights that sets expectations on communication and relationship building

Business Calendar – Item #2

CoC Strategic Plan Working Session Recap

Objective	Strategy	Action
1A: Embed evidence-based practices across the CoC	Collaborate with direct service providers to implement a people-centered, holistic, trauma-informed, case management model standard	Develop performance measures to ensure that staff and the agency adhere to the new case management model.
1A: Embed evidence-based practices across the CoC	Support CoC agencies in building a workforce where every person can thrive across all positions in the system and organizations	Develop tools and standards to support organizations in building a more representative workforce, including: <ul style="list-style-type: none"> • Standards and practices for staffing infrastructure that fosters support and provides opportunities for team members, including peers • Supports and pathways for staff/partners with lived experience (e.g., mentorship opportunities) • Practices to engage partners with lived experience in authentic ways and supported as necessary to be able to inform system change (e.g., compensation, knowledge sharing to support onboarding, assistance to address barriers to participation, etc.) • Pathways to organizational leadership for Black, Indigenous, people of color and others who have traditionally been excluded from leadership positions

Business Calendar – Item #2

CoC Strategic Plan Working Session Recap

Objective	Strategy	Action
1B: Improve CoC policies and processes	Update Written Standards to more intentionally embed key principles and align with evidence-based approaches	Review & Update Prevention / Diversion Written Standards
1B: Improve CoC policies and processes	Update Written Standards to more intentionally embed key principles and align with evidence-based approaches	Review & Update Outreach / Engagement Written Standards
1B: Improve CoC policies and processes	Update Written Standards to more intentionally embed key principles and align with evidence-based approaches	Review & Update Emergency Shelter Written Standards
1B: Improve CoC policies and processes	Update Written Standards to more intentionally embed key principles and align with evidence-based approaches	Review & Update Transitional Housing Written Standards
1B: Improve CoC policies and processes	Update Written Standards to more intentionally embed key principles and align with evidence-based approaches	Review & Update Rapid Re-Housing (RRH) Written Standards
1B: Improve CoC policies and processes	Update Written Standards to more intentionally embed key principles and align with evidence-based approaches	Review & Update Permanent Supportive Housing (PSH) Written Standards
1B: Improve CoC policies and processes	Improve Coordinated Entry System (CES) policies & processes to address gaps in housing access and outcomes	Develop more strategic outreach and culturally-informed service provision to Black/African American households

Business Calendar – Item #2

CoC Strategic Plan Working Session Recap: Discussion



- What key takeaways or feedback do you have from the working session?
- What next steps will be important for implementation of the CoC Strategic Plan?

CoC Updates

**Felicia Boehringer, CoC Administrator,
Office of Care Coordination**

Business Calendar – Item #3

OC Outreach and Engagement Update

- The County Executive Office and the OC Health Care Agency has announced the transition of OC Outreach and Engagement (OC O&E) to the Office of Care Coordination (OCC), effective July 1, 2025.
- This transition will consolidate homeless services under a unified command for operational efficiency to better address unsheltered homelessness while building upon OC O&E's experience and expertise to enhance partnerships with cities and stakeholders.
- On April 22, 2025, the Board of Supervisors (Board) approved the FY2024-25 April Budget Update which included two recommended actions approving the reorganization of OC O&E in accordance with County Administrative Procedure 0112-04 for Organizational Changes.
- Through the adoption of the FY 2025-26 Budget for the County, the Board will provide approval for the necessary budgetary actions in support of the transition of OC O&E into the Office of Care Coordination effective July 1, 2025.
- OC O&E remains committed to ensuring this transition is seamless with minimal disruptions to services or engagement with all community partners.

To make referrals to OC O&E, please call 800-364-2221

Business Calendar – Item #3

Senate Bill 914 Implementation

- At the California Interagency Council on Homelessness (Cal ICH) Advisory Committee meeting on Wednesday, May 7, 2025, an update on the implementation of Senate Bill (SB) 914 was provided.
- [SB 914 HELP \(Homeless Equity for Left Behind Populations\) Act](#) was signed into law in September 2022 and requires Cal ICH to set and measure progress toward goals to prevent and end homelessness among domestic violence survivors and their children and among unaccompanied women in California, as described. SB 914 requires initial goals to be established by January 1, 2025, and those goals to be evaluated at least every 2 years to determine whether updated goals are needed. The bill would also make related findings and declarations.
- The California Partnership to End Domestic Violence and Enfuse Action Collective are members of a multi-agency project team under that have previously contracted with Cal ICH to create a set of goals and measures to help reduce homelessness and improve outcomes for survivors and unaccompanied women throughout California.
- For the upcoming Domestic Violence Committee meeting, OCC will be collaborating with Chair Maricela Rios Faust facilitate a discussion on the the implementation of SB 914 for Survivors in Orange County.

Business Calendar – Item #3

Upcoming Meetings

- **Service Provider Forum:** Thursday, May 15, 2025, from 9:00 a.m. – 11:00 a.m.
 - ❖ Location: OCHA, Conference Room A, 1501 E Saint Andrew Pl, Santa Ana, CA 92705
- **Domestic Violence Committee:** Wednesday, May 21, 2025, from 10:00 a.m. – 11:00 a.m.
 - ❖ Location: County Administration South (CAS), Multipurpose Rooms 103/105, 601 N. Ross St., Santa Ana, CA 92701
- **CoC Board:** Wednesday, May 28, 2025, from 2:00 p.m. – 5:00 p.m.
 - ❖ Location: CAS County Conference Center, 425 West Santa Ana Blvd., Room 104/106, Santa Ana, CA 92701
- **Lived Experience Advisory Committee:** Wednesday, June 4, 2025, from 10:00 a.m. – 11:30 a.m.
 - ❖ Location: County Administration North (CAN) Multipurpose Room 400 W. Civic Center Drive, Santa Ana, CA 92701

Business Calendar – Item #3

June 2025 PPS Committee Meeting

- As part of the Behavioral Health Services Act (BHSA) Community Planning Process, the Orange County Health Care Agency is requesting to host a 90-minute focus group at the next PPS Committee meeting.
- Because of this, the Office of Care Coordination (OCC) is **proposing that the June 10, 2025, PPS Committee meeting** be extended, to be scheduled from **3:00 p.m. – 5:00 p.m.**
- OCC is seeking confirmation of availability from PPS Committee membership before proceeding.

Next Meeting:

*Tuesday, June 10, 2025, time to be
determined, in the CAS Multipurpose
Rooms 103/105, 601 N. Ross St.,
Santa Ana, CA 92701*



COUNTY OF ORANGE
OFFICE OF CARE
COORDINATION