ORANGE COUNTY CONTINUUM OF CARE
POLICIES, PROCEDURES AND STANDARDS COMMITTEE
MEETING

Tuesday, October 13, 2026
3:30 p.m. – 5:00 p.m.

Location:
County Administration South (CAS)
Multipurpose Room
601 N. Ross St., Rooms 103/105
Santa Ana, CA 92701-4599
Click Here for parking information.

Virtual Meeting Option*:
Zoom Meeting Link: Click here for meeting link
Join by phone: +1 669 444 9171
Meeting ID: 953 0688 4695

Committee Chair: Nishtha Mohendra, Friendship Shelter

Committee Members:
Judson Brown, City of Santa Ana
Nichole Gideon, Individual
Marisol Johnson, Dayle McIntosh Center
Melanie McQueen, PATH
Dr. Tiffany Mitchell, Orangewood Foundation
Robert "Santa Bob" Morse, Individual

AGENDA

In compliance with the Americans with Disabilities Act, and County Language Access Policy, those requiring accommodation and/or interpreter services for this meeting should notify the Office of Care Coordination 72 hours prior to the meeting at (714) 834-5000 or email CareCoordination@ceo.oc.gov. Requests received less than 72 hours prior to the meeting will still receive every effort to reasonably fulfill within the time provided.

Welcome and Introductions – Nishtha Mohendra, Chair

Public Comments – Members of the public may address the Policies, Procedures and Standards (PPS) Committee on items listed within this agenda or matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the PPS Committee. Public comments will be limited to three minutes. If there are more than five public speakers, this time will be reduced to two minutes. Members

of the public utilizing interpreter services will be given double the amount of time to provide public comment.

To address the PPS Committee during the Public Comment period, members of the public are to complete a Request to Address the Committee form prior to the beginning of each agenda item and submit it to Continuum of Care (CoC) staff. Staff will call your name in the order received.

Members of the public may also submit public comment by emailing CareCoordination@ceo.oc.gov. All comments submitted via email at least 24 hours before the start of the meeting will be distributed to the PPS Committee members and all comments will be added to the administrative records of the meeting. Please include "PPS Committee Meeting Comment" in the email subject line.

CONSENT CALENDAR

1. Approve the PPS Committee Meeting minutes from July 14, 2026.

BUSINESS CALENDAR

1. **HMIS Policies and Procedures Recommended Changes** – Erin DeRycke, Director, Data Analytics, 2-1-1 Orange County (211OC), Orange County United Way
    a. Approve the recommended revisions to the HMIS Policies and Procedures, inclusive of changes to the HMIS Data Quality Plan, Notice Regarding Collection of Personal Information, and Participating Agency Agreement, as recommended by the Lived Experience Advisory Committee and HMIS Policies and Procedures Working Group, for review and approval by the CoC Board.

2. **CoC Strategic Plan: CoC Board Evaluation Framework** – Tim Shaw, Strategy Owner and CoC Board Member
    a. Review and discuss the drafted CoC Board evaluation framework.

3. **CoC Strategic Plan: CoC Public Engagement and Advocacy Policy** – Becks Heyhoe-Khalil, Strategy Owner and CoC Board Member; Nichole Gideon, Strategy Owner; and Alejandro Santiago, Manager, Community Engagement, United to End Homelessness, Orange County United Way
    a. Provide feedback on the development of the Orange County CoC Public Engagement and Advocacy Policy.

Next Meeting: Tuesday, November 10, 2026, from 3:30 p.m. – 5:00 p.m., in the CAS Multipurpose Rooms 103/105, located at 601 N. Ross St., Santa Ana, CA 92701.

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Melanie McQueen, PATH
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Robert "Santa Bob" Morse, Individual

MINUTES

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Welcome and Introductions – Nishtha Mohendra, Chair

Chair Nishtha Mohendra called the meeting to order at 3:31 p.m.

Present: Nichole Gideon, Melanie McQueen, Dr. Tiffany Mitchell, Nishtha Mohendra, and Robert "Santa Bob" Morse

Absent: Judson Brown and Marisol Johnson

Request for Virtual Participation

The Brown Act allows exceptions for members of legislative bodies to participate remotely under two specified circumstances: (1) "Just Cause" or (2) "Emergency Circumstances". At least a quorum of the committee must be participating in-person for the exception(s) to be voted on and enacted. Following the Call to Order, Chair, Maricela Rios-Faust referenced a request for Policies, Procedures and Standards (PPS) Committee Member Nichole Gideon to join virtually due to "Just Cause".

Recommended Action: Allow Nichole Gideon to participate remotely for today's PPS Committee Meeting.

Robert "Santa Bob" Morse motioned to approve the Recommended Action to allow Nichole Gideon to participate remotely. Melanie McQueen seconded the motion. Chair Nishtha Mohendra issued a voice vote. No nays, no abstentions, the motion passed.

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CONSENT CALENDAR

1. Approve the PPS Committee Meeting minutes from June 9, 2026.

Robert "Santa Bob" Morse motioned to approve the Consent Calendar. Melanie McQueen seconded the motion. Chair Nishtha Mohendra issued a voice vote. No nays, no abstentions, the motion passed.

BUSINESS CALENDAR

1. CoC Governance Charter Revisions – Felicia Boehringer, CoC Administrator, Office of Care Coordination

Felicia Boehringer provided updates on the recommended revisions to the Orange County CoC Governance Charter to align with the Fiscal Year (FY) 2026 U.S. Housing and Urban Development (HUD) CoC Program Notice of Funding Opportunity (NOFO) scoring criteria related to Board governance. The proposed amendments expand the CoC Board and add new representation categories identified within the NOFO. Felicia Boehringer noted that the changes are intended to maximize CoC's NOFO application score.

Recommended Action a: Recommend the revised CoC Governance Charter, inclusive of updates to the CoC Board Composition (Section V.B.2.b) policy change in response to the Fiscal Year (FY) 2026 CoC Program Notice of Funding Opportunity (NOFO).

Melanie McQueen motioned to approve Recommended Action a. Robert "Santa Bob" Morse seconded the motion. Chair Nishtha Mohendra issued a roll call vote. Nichole Gideon, Melanie McQueen, Dr. Tiffany Mitchell, Nishtha Mohendra, and Robert "Santa Bob" Morse voted yes. The motion passed unanimously.

Committee Discussion:

- Dr. Tiffany Mitchell asked for clarification on the presentation; further emphasizing expanding lived experience representation on the CoC Board while maintaining meaningful participation and continued representation from the Lived Experience Advisory Committee (LEAC) and the Youth Action Board (YAB). Dr. Tiffany Mitchell stated that any CoC Governance Charter revisions should support the homeless response system, reflect evolving community needs, and align with the culture and values of the CoC Board.
- Melanie McQueen thanked the Office of Care Coordination for the presentation and asked whether the proposed CoC Governance Charter revision would meaningfully improve the CoC's competitiveness for the NOFO application, given the limited points assigned to Governance Structure in the applications. Melanie McQueen emphasized focusing on changes the provide the greatest system-wide impact.
- Robert "Santa Bob" Morse asked whether increasing the CoC Board to a maximum of 25 members would be sufficient to ensure all proposed Governance Composition changes could be included. Robert "Santa Bob" Morse also discussed the challenges of recruiting elected officials, the timing of elections, and the importance of meeting requirements for elected officials and lived experience representation.
- Nichole Gideon supported moving forward with the proposed revision to meet required deadlines while allowing the Nominating Ad Hoc Committee to complete a more thorough review during the annual process.
- Chair Nishtha Mohendra supported expanding CoC Board membership without reducing the overall effectiveness of the CoC Board. Chair Nishtha Mohendra suggests using minimum membership requirements in the CoC Governance Charter to allow great flexibility and support the proposed revisions to strengthen the CoC's NOFO application. Chair Nishtha Mohendra noted that the CoC board expansion should be implemented thoughtfully to balance the broader representation and effective governance.

2. **CoC Policy to Advance Recovery and Prohibit Illicit Drug Use** – Felicia Boehringer, CoC Administrator, Office of Care Coordination

Felicia Boehringer provided updates on the recommended adoption of an Orange County CoC Policy to Advance Recovery and Prohibit Illicit Drug Use to respond to the scoring criteria within the FY2026 HUD CoC Program NOFO. The proposed policy prohibits CoC-funded projects from operating safe consumption sites or distributing drug paraphernalia, outlines remedies for noncompliance, encourages substance use treatment and recovery housing, and allows sobriety-based housing where permitted. Felicia Boehringer explained that the adoption of the policy would support the competitiveness of the CoC's application by scoring up to 10 points as outlined in the scoring criteria.

Recommended Action a: Recommend the policy detailing how the Orange County CoC will advance recovery and prohibit illicit drug use, in response to the FY2026 CoC Program NOFO, for review and approval by the CoC Board.

Dr. Tiffany Mitchell motioned to approve Recommended Action a. Melanie McQueen seconded the motion. Chair Nishtha Mohendra issued a voice vote. No nays, no abstentions, the motion passed.

Committee Discussion:

- Dr. Tiffany Mitchell asked how many current CoC-funded projects would be affected by the proposed policy and sought clarification on what is required to earn the full points allocated to this item in the scoring criteria.
- Nichole Gideon confirmed that Narcan is not on the prohibited listed and that the policy does not require participants sobriety or mandate treatment. Nichole Gideon also asked whether the policy would have any operational impact on current providers and projects.
- Melanie McQueen clarified whether the policy prohibits the safe disposal of substance or drug paraphernalia and does not impose additional related restrictions.
- Chair Nishtha Mohendra supported proactively aligning with HUD's NOFO while noting that the policy does not change day-to-day service delivery. Chair Nishtha Mohendra emphasized the importance of clear communication with providers and new applicants, and appreciate the thoughtful approach to implementation from the Office of Care Coordination.

Chair Nishtha Mohendra adjourned the meeting at 4:31 p.m.

Adjournment to: *Regular meeting on August 11, 2026, from 3:30 p.m. – 5:00 p.m., at CAS Multipurpose Rooms 103/105, located at 601 N. Ross St., Santa Ana, CA 92701.*

Business Calendar
Agenda Item 1

Date: October 13, 2026

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

Recommended Action:

a. Approve the recommended revisions to the HMIS Policies and Procedures, inclusive of changes to the HMIS Data Quality Plan, Notice Regarding Collection of Personal Information, and Participating Agency Agreement, as approved by the Lived Experience Advisory Committee (LEAC), for review and approval by the Policies, Procedures and Standards (PPS) Committee.

Background

On an annual basis, 2-1-1 Orange County (211OC), a key service of Orange County United Way, as the HMIS Lead for the Orange County Continuum of Care (CoC), initiates a review of the HMIS Policies and Procedures, as well as all related privacy and security documentation. 211OC convened the HMIS Working Group six times from May 2026 to August 2026 to review all materials and propose revisions. After updated drafts were shared with the working group, a community feedback period was held from September 1, 2026, through September 18, 2026. In addition, proposed changes were presented to the LEAC for feedback on September 2, 2026. On October 7, 2026, the HMIS Policies and Procedures, HMIS Data Quality Plan, Notice Regarding Collection of Personal Information, and Participating Agency Agreement were reviewed and approved by the LEAC, no feedback was received.

A summary of the proposed revisions to all documents is available in **Attachment A**. Feedback received during the review process is available in **Attachment B**. The PPS Committee is being asked to review and approve the revised HMIS Policies and Procedures (**Attachment C**), the OC HMIS Participating Agency Agreement (**Attachment D**), Notice Regarding Collection of Personal Information (**Attachment E**), the OC HMIS Data Quality Plan (**Attachment F**), and the new appendix to the Data Quality Plan, the OC HMIS Sample Agency Data Quality Plan (**Attachment G**).

Attachments

Attachment A – OC HMIS Policy and Privacy Documentation Proposed Revisions
Attachment B – OC HMIS Policy and Privacy Documentation Feedback Received
Attachment C – OC HMIS Policies and Procedures (Redlined Version)
Attachment D – OC HMIS Participating Agency Agreement (Redlined Version)
Attachment E – OC HMIS Participating Agency Agreement (Clean Version)
Attachment F – Notice Regarding Collection of Personal Information (Redlined Version)
Attachment G - Notice Regarding Collection of Personal Information (Clean Version)
Attachment H – OC HMIS Data Quality Plan (Redlined Version)
Attachment I – OC HMIS Data Quality Plan (Clean Version)
Attachment J – OC HMIS Sample Agency Data Quality Plan

Orange County Homeless Management Information System (HMIS) Policy and Privacy Documentation

HMIS Policies and Procedures

Summary of Proposed Revisions

- Key Terms & Acronyms
  - New: Definitions for Universal Data Elements, Program Specific Data Elements, and Program Descriptor Data Elements.
- Help Desk
  - New: References HMIS Calendar for holidays and closures.
  - New: HMIS Help Desk with provide weekly updates for tickets that take longer than 3 days to resolve.
  - New: Any client-identifying data sent to the HMIS Help Desk from a Participating Agency will be considered a data breach, and will be handled according to the policies in that section.
- Agency Access
  - Clarification: Any organization can participate in HMIS as long as they meet the requirements for access, including faith-based or community organizations.
  - Clarification: Organizations may be denied access to HMIS if the organization's activities are not aligned with housing stability or service provision.
- Participating Agency Requirements
  - Clarification: Any user at the agency can attend HMIS User Meetings to meet minimum participation requirements
- HMIS User Requirements
  - Clarification: Agency Administrators must complete an Agency Administrator training in addition to the required trainings for HMIS users.
- Agency Administrator Requirements
  - Clarification: Process for removing HMIS access for users.
  - New: HMIS Lead should be notified of users that no longer need access to HMIS within 2 business days.
  - Clarification: Data quality thresholds for data completeness and data timeliness for all projects participating in HMIS.
  - Clarification: Process for reporting changes in project set-up, including bed inventory and funding changes.
  - New: Project set-up changes must be reported to the HMIS Lead within 5 business days.
  - New: Project closures must be reported to the HMIS Lead within 15 business days of closure. Also, projects should be closed when they are not providing services for over 30 days.
  - New: Agency Administrators must be employed by the Participating Agency, and cannot be a volunteer.

- Privacy
    - New: HMIS passwords should not be autosaved on any device, and if a password needs to be stored, a password manager should be used.
    - Clarification: Users that have been deactivated need to take the HMIS Reactivation Training Course and HMIS Skill Test to reactivate the account.
    - Clarification: Users that transition from one Participating Agency to another may have their HMIS account reactivated without requiring additional training if the user has logged into their account within the last 60 days, and the user will maintain the same level of access to HMIS.
    - New: Participating Agencies may send the Client Consent to Share Protected Personal Information Form electronically via applications such as DocuSign.
    - Clarification: Participating Agencies must explain that signing the Client Consent to Share Protected Personal Information form means that the client's record will be shared with other HMIS Participating Agencies for care coordination, and that the client's data may be shared in data requests approved by the CoC Board for analytical use or academic research purposes.
    - Clarification: Note Regarding Collection of Personal Information must be available in all areas where staff are collecting data from clients to be entered into HMIS. Outreach teams should have paper or virtual copies to share with clients.
- Client Record Requests
    - New: Allows clients to request their record directly from the HMIS Lead.
    - Clarification: Provides guidance on how to verify a client's identity in person or virtually.
    - Clarification: Provides guidance on how client records can be shared with clients.
    - New: Documentation that the client provided or signed can now be included in Client Record Requests.
    - Clarification: Client Record Request Form Documentation will be included with the client's record to provide details about information included in the record.
    - New: Prior to sharing case notes, Participating Agencies must redact identifying third party information, like staff or agency names, names of other clients, or shelter bed numbers.
- Data Release
    - Clarification: Service Providers with access to Coordinated Entry data are not permitted to publish any Coordinated Entry data without approval of the CoC Board as outlined in the Data Request Matrix.
    - Clarification: The CES Lead and CES Administrators are required to adhere to policies outlined in the HMIS Policies and Procedures regarding Data Release.
    - New: Data requests must include a local stakeholder within the CoC that will be responsible for sharing the results of the request, and implementing changes within the CoC as appropriate.
    - New: Exploratory data requests must include HMIS data as the primary focus of the analysis. Using HMIS data anecdotally in larger analyses will not be permitted.
- Data Breach
    - New: Participating Agencies will make at least 3 attempts over 2 weeks to notify clients impacted by data breaches using telephone, secure email, and mail.

- New: Establishes corrective actions for data breaches.

HMIS Data Quality Plan

- Clarification: Added guidance for understanding the different data quality components.
- Clarification: Added guidance for reviewing data accuracy, and reducing missing data.
- New: Added a sample data quality plan to help Participating Agencies develop their own plans.

Note Regarding Collection of Personal Information

- Clarification: Simplified language

Participating Agency Agreement

- Clarification: Added additional language regarding client consent and user access
- Clarification: Client data can still be entered into HMIS if the client doesn't give consent to share data
- New: Removed HMIS Lead signature

Homeless Management Information System (HMIS) Policy and Privacy Documentation

Feedback Received from May 2026 – October 2026

HMIS Policies and Procedures Working Group Feedback: May 2026 – August 2026

Section	Feedback	Response
Key Terms & Acronyms	Add definitions for Universal Data Elements, Program Specific Data Elements, and Program Descriptor Data Elements	Added definitions
Help Desk	Agency Administrators would like more regular updates on tickets that are not resolved within 3 business days	Added: HMIS Staff will provide weekly updates for tickets that may take longer than 3 business days to resolve. Some examples of tickets that may take additional time: solutions requiring coordination between partner agencies, system error tickets escalated to the HMIS vendor, or tickets pending additional guidance from outside entities, like the OC Collaborative Applicant, the CES Administrator, or federal or state technical assistance departments.
Data Breach	Add corrective action plan for data breaches	Added corrective action plan for up to four occurrences of data breaches by one user.
Agency Access	HMIS access should be expanded to community-based and faith-based organizations	Added: Organizations are not limited to non-profit service providers, and may include faith-based or community organizations, as well as any other organization that meets the criteria in this section.
Agency Access	Add additional details regarding why an agency may be denied HMIS access	Added: The Agency Access Working Group may deny access to HMIS if the organization's activities are not aligned with housing stability or service provision. Reasons for denial may include but are not limited to: the organization does not have an established history of service delivery or outreach, service delivery is inconsistent or sporadic, or the organization doesn't have the capacity to participate fully in HMIS.
Data Quality Plan	Add corrective action plan for data quality issues	The Enforcements section in the Data Quality Plan includes a corrective action plan.
Participating Agency Requirements	More education and awareness for agency leadership regarding data quality and performance	The HMIS Lead is considering an implementation plan for this feedback. A policy will be created if needed once the plan is finalized.

Agency Administrator Requirements	Annual recertification should be required for Agency Administrators	Added requirement to Policies and Procedures, but received conflicting community feedback. HMIS Lead is releasing a survey for Participating Agency feedback.
Privacy	Include policy for users that transition from one HMIS Participating Agency to another	Added: Users that transition from one Participating Agency to another may have their HMIS account reactivated without requiring additional training if the user has logged into their account within the last 60 days, and the user will maintain the same level of access to HMIS.
Privacy	Consider whether clients should have a consent form signed every time they begin a new enrollment	This may be cumbersome for Participating Agencies. Instead, the HMIS Lead is developing a quarterly process for Participating Agencies to review client consent records and collect updated forms as needed.
Client Record Requests	Add guidance on how to verify a client's identity for client record requests	Added link to knowledge base article for instructions on how to verify a client's identity virtually or in person.
Client Record Requests	Give guidance on how a Participating Agency should determine whether or not to share case notes	Added: Participating Agencies are encouraged to review their liability insurance and the contents of the case notes prior to sharing with a client.
Data Release	Add more policies around Coordinated Entry data	Added: Service Providers with access to Coordinated Entry data are not permitted to publish any Coordinated Entry data without approval of the CoC Board as outlined in the Data Request Matrix. The CES Lead and CES Administrators are required to adhere to policies outlined in this section.
Data Breach	Provide guidance on how many attempts should be made to notify a client when a data breach occurs	Added: Participating Agencies will make at least 3 attempts over 2 weeks to notify the client impacted by the following methods; telephone, secure email, and mail. The outreach attempts will be documented as case notes in HMIS. Participating Agencies will at a minimum in compliance with the policies outlined in this document. Participating Agencies will be required to also be in alignment with their internal agency policies related to data breach.

Lived Experience Advisory Committee (LEAC) Feedback: September 2026

Section	Feedback	Response
Data Release	The HMIS Lead should charge fees for data requests	This feedback is under consideration. The HMIS Lead will allocate a certain number of hours for data requests that are approved by the CoC Board on an annual basis. The CoC Board will determine which data requests should be approved to use those hours.
Data Quality Plan	Include a policy about correcting Approximate Date Homelessness Started (ADHS) field	The HMIS Lead has implemented parameters in data quality reporting to identify logic errors with the ADHS field, like dates after the client's Project Start Date or before the client's Date of Birth. The HMIS Lead is continuing to develop training materials and tool tips in HMIS to help users capture this field correctly, as well as highlighting old records for review by agencies during quarterly data quality reviews.
Client Record Request	Include contact information so clients can contact HMIS Lead	Added: To submit a ticket directly to the HMIS Lead, clients can call the HMIS Help Desk at 714-589-2360. Requests submitted to the HMIS Lead will be responded to in accordance with policies outlined in the Help Desk section of this document. Client Record Request web page will also be updated.
Data Release	Include policy to require results of data requests to return to the CoC Board	Added: Data requests must intend to facilitate positive impact on the structure or processes within the Orange County Continuum of Care, or otherwise benefit people experiencing homelessness or at risk of homelessness in the Orange County Continuum of Care. Requests must include a local stakeholder or "champion" within the Continuum of Care that will be responsible for sharing the results of the request, and implementing changes within the Continuum of Care as appropriate.

Community Feedback Period: September 2026

Section	Feedback	Response
Agency Administrator Responsibilities	Agency Administrators should be employees of the agency, not a volunteer position	Added: Agency Administrators must be employed by the Participating Agency, and cannot be volunteers.
HMIS User Requirements	User recertifications are cumbersome, and may require training on components not relevant to some users	The HMIS Lead will release a survey to seek HMIS Participating Agency feedback.

Client Record Requests	Remove third party information from case notes released by a Participating Agency	Added: Prior to sharing case notes, Participating Agencies must redact identifying third party information, like staff or agency names, names of other clients, or shelter bed numbers.
Data Quality Plan	Add a requirement for agencies to review their data annually and submit a narrative of any issues, and an action plan to resolve	The HMIS Lead is considering an implementation plan for this feedback. A policy will be created if needed once the plan is finalized.

HMIS Participating Agency User Recertifications Survey: September 2026 (37 respondents)

Section	Feedback	Response
HMIS User Requirements	92% of respondents (34) agree or strongly agree that the User Recertification is beneficial to review topics such Client Privacy, Data Collection and System Updates. 78% (29) said the annual User Recertifications should be required for all users.	The requirement for annual User Recertifications will continue.
HMIS User Requirements	51% of respondents (19) said that there should not be an annual Recertification for Agency Administrators in addition to the User Recertification.	The Agency Administrator Recertification will not be implemented at this time.
HMIS User Requirements	The recertification should focus on updates or trending items instead of repeating the same skills test.	The HMIS Lead will remove the Recertification Skills Test requirement and instead create a course that focuses on critical updates and recurring issues, including privacy and security and data quality.
HMIS User Requirements	System use varies by role, so some components of the skills test don't apply to all users.	The HMIS Lead will remove the Recertification Skills Test requirement and instead create a course that focuses on critical updates and recurring issues, including privacy and security and data quality.

Lived Experience Advisory Committee (LEAC): October 7, 2026

No feedback was received.

2026 Review

Orange County HMIS Policies and Procedures

~~MAY 2025~~OCTOBER 2026

DRAFT

Orange County United Way/2-1-1 Orange County
WWW.OCHMIS.ORG |WWW.UNITEDWAYOC.ORG

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Key Terms and Acronyms

All documents referenced in the HMIS Policies and Procedures can be found on the HMIS Documents page of the OC HMIS ~~Information~~ website unless otherwise noted.

Term	Acronym (if applicable)	Definition
Orange County United Way/2-1-1 Orange County	OCUW/211OC	HMIS Lead Agency for Orange County CoC
Agency Administrator	AA	The HMIS User designated by their agency to serve as Agency Administrator is responsible for training new HMIS Users and overseeing data quality management, among other duties described in the Policies and Procedures
Agency Agreement		The annual agreement form between Orange County HMIS participating agencies and the HMIS Lead Agency that specifies the rights and responsibilities of each party regarding the use of HMIS.
Aggregate Data		Data that has been collected from different clients and compiled into sums. Aggregate data does not include any information that could identify a particular client.
Annual Homeless Assessment Report	AHAR	The AHAR is a national-level report that provides information about homeless service providers, people and households experiencing homelessness, and various characteristics of that population. It informs strategic planning for federal, state, and local initiatives designed to prevent and end homelessness. The AHAR is submitted to Congress on an annual basis.

Chronically Homeless	CH	In order to be eligible for housing restricted to chronically homeless individuals or families under the CoC program, participants must meet the definition of chronically homeless. The definition of chronically homeless is:
		
		• A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:
		  ○ Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and
		  ○ Has been homeless and living as described 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.
		• An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility**; or
		• 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 of this definition, including a family whose

		composition has fluctuated while the head of household has been homeless.
Client Identifying Information	CII	Client Identifying Information, also known as Personal Protected Information (PPI), is a category of sensitive information that is associated with an individual person. This information should be accessed only on a strict need-to-know basis, and should be handled and stored with care. ~~This category includes but is not limited to:~~Client Identifying Information includes f~~F~~irst names, last names, dates of birth, and Social Security Numbers, but it can also include any other information that can be used to identify a client, like case notes, mailing addresses, or email addresses.~~.~~ ~~Please refer the additional document available in the Adding Client Profiles to HMIS Knowledge Base article.~~
Continuum of Care	CoC	The Continuum of Care is a collection of nonprofits, agencies, and people with lived experience of homelessness that come together to promote community wide commitment to the goal of ending homelessness; promote access to and affect utilization of mainstream programs by individuals and families experiencing homelessness; and optimize self-sufficiency among individuals and families experiencing homelessness.
Continuum of Care Board	CoC Board	The Continuum of Care Board is the governing body for the Orange County CoC. They are committed to the goal of ending homelessness and are organized to carry out the responsibilities required under the CoC Program regulations, 24 CFR Part 578.
Continuum of Care Collaborative Applicant	CoC Collaborative Applicant	The Orange County CoC designated the County of Orange as the Collaborative Applicant. The CoC Collaborative Applicant is tasked with coordinating the development of the CoC system, its planning, and supporting the various functions and activities as required by the HEARTH Act.
Continuum of Care Program	CoC Program	The CoC Program is designed to assist individuals (including unaccompanied youth) and families experiencing homelessness and to provide the services needed to help such individuals move into transitional and permanent housing, with the goal of long-term stability. More broadly, the program is designed to promote community-wide planning and strategic use of resources to address homelessness; improve coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improve data collection and performance measurement; and allow each community to tailor its program to the particular strengths and challenges within that community.
Coordinated Entry System	CES	A project that administers the CoC's centralized or coordinated process to coordinate assessment and referral of individuals and families seeking housing or services, including the use of a comprehensive and standardized assessment tool.
Coordinated Entry System Lead	CES Lead	The CES Lead is empowered by the CoC to manage the process of determining and updating the prioritization for all housing resources that participate in the Coordinated Entry System.

Coverage Rate		Coverage rate refers to the percentage of beds targeted to serve people experiencing homelessness in a geographic area that are captured in the HMIS divided by the total number of beds targeted to serve people experiencing homelessness in the geographic area (excluding beds targeted to serve domestic violence clients). Coverage rate estimates are used to project a total homeless count if there are homeless service providers in the jurisdiction that do not participate in HMIS.
Day Shelter	DS	A project that offers daytime facilities and services (no overnight lodging) for persons who are experiencing homelessness.
Department of Health and Human Services	HHS	The U.S. Department of Health and Human Services (HHS), also known as the Health Department, is a cabinet-level department of the U.S. Federal government. The Health Department's goal is to protect the health of all Americans and provide essential human services.
Emergency Shelter – Entry Exit	ES - EE	A project that offers temporary shelter (lodging) for people experiencing homelessness in general or for specific populations of people experiencing homelessness. Requirements and limitations may vary by program and will be specified by the funder. This project type should be used for all shelters that collect Universal Data Elements and certain Program-Specific Data Elements at project start and project exit, including projects that require or strongly encourage a continuous stay while a client resolves their experience of homelessness. In these shelters, length of stay is calculated based on the number of nights between project start and project exit, and performance measures will include changes from project start and project exit Data Collection Stages.
Emergency Shelter – Night-by-Night	ES - NbN	This project type may be used by some high-volume shelters and shelters where a significant proportion of clients spend a night at the shelter as needed on an irregular basis. This project type relies on creating a separate record of each individual date on which a client is present in the shelter as a means for calculating length of stay and implies that the emergency shelter is generally unable to collect as much client data at project exit as ES – EE shelters for tracking utilization. In ES - NbN shelter:(1) entry information is collected the first time that a client stays at the shelter (2) the project records every discrete date (or series of dates) that the client resides in the shelter; (3) the HMIS maintains historical data on the nights a client is sheltered; (4) the client may be exited when shelter staff has information that indicates that the client is unlikely to return to the shelter or the system may be designed to automatically generate an exit (dating back to the day after the last bed night) after an extended absence; and (5) for reporting purposes, a client's length of stay in the project will be based on the actual number of bed nights and not on the period of time from entry to exit.
Emergency Solutions Grants Program	ESG	The ESG program provides funding to: • Engage individuals and families experiencing homelessness who are living on the street; • Improve the number and quality of emergency shelters for individuals and families experiencing homelessness; • Help operate these shelters;

		• Provide essential services to shelter residents; • Rapidly re-house individuals and families experiencing homelessness; and • Prevent families and individuals from becoming homeless.
Health Insurance Portability and Accountability Act of 1996	HIPAA	The Health Insurance Portability and Accountability Act of 1996, particularly the Privacy Rule under Title II, regulates the use and disclosure of Protected Health Information held by covered entities and business associates. HIPAA is the base operational privacy rule on which the Orange County HMIS Privacy Notice is structured.
HMIS Lead Agency		The HMIS Lead Agency is an agency, organization, or government department designated by the CoC Board to administer and manage the HMIS for the CoC jurisdiction.
Homeless Management Information System	HMIS	A data system that meets HUD's requirements and is used to collect client-level data and data on the provision of housing and services to individuals and families experiencing homelessness and persons at risk of homelessness. The HMIS is also the primary reporting tool for HUD homeless service grants as well as for other Federal, State and local government streams of funding related to homelessness. HMIS data is used to better inform homeless policy and analyze program and system impact in addressing homelessness.
Homelessness Prevention	HP	A project that offers supportive services and/or financial assistance necessary to prevent individuals and families from experiencing homelessness, including moving into an emergency shelter or place not meant for human habitation.
Housing Inventory Count	HIC	The HIC is a point-in-time inventory of housing programs within a CoC that provide beds and units dedicated to serve people experiencing homelessness (or for permanent housing projects, were experiencing homelessness at entry). The project types included in the HIC are Emergency Shelter, Transitional Housing, Rapid Re-housing, Safe Haven, and Permanent Supportive Housing. HUD requires the submission of the HIC on an annual basis.
Housing Opportunities for Persons with AIDS Program	HOPWA	HOPWA provides housing assistance and related supportive services for persons with HIV/AIDS, and family members who are experiencing homelessness or are at risk of homelessness. This project has different project reporting requirements than the other HUD funded projects described in the Policies and Procedures.
Interagency Data Sharing Consent Form		Allows client-level data and enrollment data to be shared among OC HMIS Participating Agencies. HOPWA funded projects are exempt from the data sharing mandate due to privacy laws protecting clients' HIV status.
Length of Stay	LOS	The number of days between the beginning of services and the end of services. It is calculated using entry and exit dates or shelter stay dates, depending on the project's method of tracking bed nights.

Lived Experience Advisory Committee	LEAC	This Committee was created to obtain and include community-level feedback from persons with current and past lived experience of homelessness in the CoC's efforts to end homelessness in Orange County. This includes providing input on policies, procedures, and standards development and improving the quality and types of services provided to people experiencing homelessness.
Longitudinal Systems Analysis	LSA	The LSA is a report submitted by each CoC on an annual basis to HUD, and includes demographic, performance, and household composition information, as well as patterns of system use. The LSA from each CoC is consolidated to create the AHAR that is submitted to Congress.
Other (project type)		A project that offers services, but does not provide lodging, and cannot otherwise be categorized as another project type, per above. Any project that provides only stand-alone supportive services (other than outreach) and has no associated housing outcomes should be categorized as 'Other.' For example, a project funded to provide childcare for persons in permanent housing or a dental care project funded to serve people experiencing homelessness should be designated 'Other.' A project funded to provide ongoing case management with associated housing outcomes should be designated 'Services Only.'
Participating Agencies		Agencies, organizations or local government departments that actively participate in HMIS through input of client-level data and project information.
PH - Housing Only	OPH	A project that offers permanent housing for persons who are experiencing homelessness, but does not make supportive services available as part of the project.
PH – Housing with Services (no disability required for entry)	OPH	A project that offers permanent housing and supportive services to assist people experiencing homelessness to live independently, but does not limit eligibility to individuals with disabilities or families in which one adult or child has a disability.
PH - Permanent Supportive Housing (disability required for entry)	PSH	A project that offers permanent housing and supportive services to assist chronic homeless persons with a disability (individuals with disabilities or families in which one adult or child has a disability) to live independently.
PH - Rapid Re-Housing	RRH	A permanent housing project that provides housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help individuals or families experiencing homelessness to move as quickly as possible into permanent housing and achieve stability in that housing.
PH - Rapid Re-Housing Subtypes		RRH: Services Only - A RRH project that provides services only and does not provide ongoing rental assistance or support any inventory for participants. RRH: Housing with or without services - A RRH project that offers ongoing rental assistance that may or may not be accompanied by financial or other supportive services to participants.

Point in Time Count	PIT	A point-in-time count is an unduplicated count on a single night during the last ten days of January of the people in a community who are experiencing homelessness that includes both sheltered and unsheltered populations. An annual sheltered PIT count is conducted using HMIS data and other sources. A biannual unsheltered PIT is conducted every two years.
Policies, Procedures, and Standards Committee	PPS Committee	The PPS Committee will function as an advisory group to the CoC Board. This committee aligns with the intent of ensuring that the CoC has clearly documented policies and standards for process review, policy formation, assessment of current policies and procedures and formation and conduct of committees in the service of the CoC, CES, and HMIS. The PPS Committee will support with creating a clear structure for policy development and subsequent revisions, monitoring and vetting work done through committees, work groups and ad hoc groups will create efficiencies and improve the amount of work that the CoC Board can accomplish.
Program-Specific Data Elements	PSDEs	To meet the statutory and regulatory requirements of federally funded programs using HMIS, additional elements are required for different funding sources. The Program Specific Data Elements are elements that are required by at least one of the HMIS Federal Partner programs. Some of the program specific data elements are collected across most Federal Partner programs. These are called "Common" Program Specific Data Elements.
Project Descriptor Data Elements	PDDEs	Project descriptor data elements (PDDEs) are intended to identify the organization, specific project, and project details to which an individual client record is associated in an HMIS. PDDEs enable the HMIS to: • Associate client-level records with the various projects that the client will enroll in across continuum projects. • Clearly define the type of project the client is associated with the entire time they receive housing or services. • Identify which federal partner programs are providing funding to the project. • Track bed and unit inventory and other information by project, which is relevant for the Longitudinal Systems Analysis (LSA), System Performance Measures (SPM), Housing Inventory Counts (HIC), Point-in-Time (PIT) counts, and utilization analysis.

Project Types		A project is to be assigned a 'Project Type' based on the lodging or service it is providing. The project type selected directly impacts data collection and reporting requirements. The U.S. Department of Housing and Urban Development defines these Project Types in HMIS: • Homelessness Prevention • Street Outreach • Emergency Shelter - Entry Exit • Emergency Shelter - Night-by-Night • Day Shelter • Transitional Housing • Safe Haven • PH - Rapid Re-Housing • PH - Permanent Supportive Housing (disability required for entry) • PH – Housing with Services (no disability required for entry) • PH - Housing Only • Coordinated Entry • Services Only • Other
Projects for Assistance in Transition from Homelessness	PATH	PATH is funded by the Substance Abuse and Mental Health Services Administration (SAMHSA). It provides services to people experiencing homelessness who are also experiencing mental illness, primarily through street outreach, to link them to permanent community housing. This project has different reporting requirements than HUD funded projects and uses HMIS to collect this information.
Rapid Re-Housing: Services Only	RRH: Services Only	A type of Rapid Re-Housing project that provides services only and does not provide ongoing rental assistance or support any inventory for participants.
Rapid Re-Housing: Housing with or without services	RRH: Housing with or without services	A type of Rapid Re-Housing project that offers ongoing rental assistance that may or may not be accompanied by financial or other supportive services to participants.
Runaway Homeless Youth program	RHY	The RHY program supports street outreach, emergency shelters and longer-term transitional living and maternity group home programs to serve youth experiencing homelessness (up to age 25). The program is managed by the Family and Youth Services Bureau (FYSB).
Safe Haven	SH	A project that offers supportive housing that (1) serves hard to reach people experiencing homelessness with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services; (2) provides 24-hour residence for eligible persons for an unspecified period; (3) has an overnight capacity limited to 25 or fewer persons; and (4) provides low demand services and referrals for the residents.

Services Only	SSO	A project that offers only stand-alone supportive services (other than outreach) to address the special needs of participants (such as childcare, employment assistance, and transportation services) and has associated housing outcomes.
Street Outreach	SO	A project that offers services necessary to reach out to people experiencing unsheltered homelessness, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to people experiencing unsheltered homelessness who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Only persons who are "street homeless" should be entered into a street outreach project. Projects that also serve persons other than "street homeless" must have two separate projects ~~to be~~ set up in an HMIS – one 'Street Outreach' and the other 'Services Only.'
Supportive Services for Veteran Families Program	SSVF	SSVF is a program overseen by the VA, and the purpose is to provide supportive services grants to private non-profit organizations and consumer cooperatives who will coordinate or provide supportive services to very low-income veteran families who are residing in permanent housing, are experiencing homelessness and scheduled to become residents of permanent housing within a specified time period, or after exiting permanent housing, are seeking other housing that is responsive to such very low-income veteran family's needs and preferences.
System Performance Measures Report	SPM	The HUD System Performance Measures Report measures the performance of a CoC as a whole as mandated by the 2009 HEARTH Act. The report analyzes the performance of Safe Haven, Street Outreach, Emergency Shelter, Transitional Housing, and Permanent Housing (including Permanent Supportive Housing, Rapid Re-Housing, and Other Permanent Housing) project types in the Orange County CoC that participate in HMIS.
Transitional Housing	TH	A project that provides temporary lodging and is designed to facilitate the movement of individuals and families experiencing homelessness into permanent housing within a specified period of time, but no longer than 24 months. Requirements and limitations may vary by program and may be specified by the funder.
Universal Data Elements	UDEs	HMIS Universal Data Elements are elements required to be collected by all projects participating in HMIS, regardless of funding source. Projects funded by any one or more of the federal partners must collect the Universal Data Elements (UDEs), as do projects that are not funded by any federal partner (e.g., missions) but have agreed to enter data as part of the CoC's HMIS implementation. The UDEs are the basis for producing unduplicated estimates of the number of people experiencing homelessness accessing services from homeless assistance projects, basic demographic characteristics of people experiencing homelessness, and patterns of service use, including information on shelter stays and homelessness over time.
U.S. Department of Housing and Urban Development	HUD	HUD is a Cabinet department in the Executive branch of the U.S. Federal government. HUD provides funding to CoCs across the country serving~~e~~ people experiencing homelessness.

U.S. Department of Veterans Affairs	VA	The U.S. Department of Veterans Affairs provides patient care and federal benefits to veterans and their dependents.
User Agreement		The agreement form between individual users and the HMIS Lead Agency that outlines a user's responsibilities when using HMIS. Individual users are staff or volunteers that have access to HMIS on behalf of agencies participating in HMIS. This form is signed on the user's first log-in to HMIS, and again every year the user's account is active.
Veteran Affairs Supportive Housing	VASH	The VASH program combines Housing Choice Voucher (HCV) rental assistance for Veterans experiencing homelessness with case management and clinical services provided by the VA. The VA provides these services for participating Veterans at VA Medical ~~V~~Centers (VAMCs) and community-based outreach clinics.

Orange County United Way: HMIS Lead Agency

The Orange County CoC has designated Orange County United Way as the Lead Agency. Orange County United Way's key service, 2-1-1 Orange County (211OC), connects thousands of Orange County (OC) residents with health and human service resources, and administers HMIS for the Orange County CoC. As such, 211OC is tasked with assisting the Orange County CoC with:

- Developing and implementing ~~a~~ privacy ~~plan~~, security ~~plan~~ and data quality plans for the Orange County CoC's HMIS
- Ensuring consistent participation of State, Federal and local government funded recipients and sub recipients in HMIS
- Ensuring HMIS is administered in compliance with requirements prescribed by the U.S. Department of Housing and Urban Development (HUD)
- Ensuring the HMIS operates efficiently and effectively to promote agency participation and system coordination
- Providing system, agency, and project-level analysis of utilization and performance across the CoC

HMIS Lead Agency Contact Information:

OC HMIS Information Website	http://ochmis.org/
OC HMIS Training Website	http://training.ochmis.org/
OC HMIS Login	https://oc.clarityhs.com/login
HMIS Helpdesk	http://ochmis-211oc.happyfox.com/home

I. Background & Purpose

The Homeless Management Information System (HMIS) is the electronic data collection system utilized by the Orange County Continuum of Care (CoC) to comply with the responsibilities outlined in 24 CFR 578.7(b) for designating and operating an HMIS. HMIS is the local information technology system ~~requirements~~ that the U.S. Department of Housing and Urban Development (HUD) funding recipients and subrecipients use for homeless assistance programs as authorized by the McKinney-Vento Homeless Assistance Act. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act

codifies in law certain data collection requirements integral to HMIS. The HEARTH Act requires that HUD ensure operation of and consistent participation by recipients and sub-recipients in an HMIS compliant software. –Current HMIS standards are included in the 2004 Technical Standards and the ~~2010~~ FY2026 Data Standards.

HUD and other planners and policymakers use aggregate HMIS data to better inform homeless policy and decision making at the federal, state and local government levels. HMIS enables HUD to collect aggregate data at the national-level on the extent and nature of homelessness over time. Specifically, an HMIS can be used to produce an unduplicated count of people experiencing homelessness, understand patterns of service use, and measure the effectiveness of homeless programs. Data on people experiencing homelessness is collected and maintained at the local level. HMIS implementations can encompass geographic areas ranging from a single city to an entire state.

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act also requires that all communities have an HMIS with the capacity to collect unduplicated counts of individuals and families experiencing homelessness. Through HMIS, the CoC should be able to collect information from projects serving individuals and families experiencing homelessness to use as part of their needs analyses and to establish funding priorities. The HEARTH Act also codified into law certain data collection requirements integral to HMIS. With enactment of the HEARTH Act, HMIS participation became a statutory requirement for recipients and subrecipients of CoC Program and Emergency Solutions Grants (ESG) funds.

HMIS can be used to:

- Produce an unduplicated count of persons experiencing homelessness for each CoC
- Describe the extent and nature of homelessness locally, regionally, and nationally
- Identify patterns of service use
- Measure program effectiveness

The ensuing set of HMIS Policies and Procedures documents the Orange County CoC's operation of its HMIS and acts as a guide to its continuing operation in compliance with the CoC and ESG Regulations and Interim Rules. The HMIS Policies and Procedures have been developed to further the following HMIS Goals:

- Assist in facilitating the coordination of care for people experiencing homelessness and at risk of homelessness populations.
- Ensure accurate data about the nature of homeless services and clients in the Orange County CoC.
- Ensure accurate data about the nature and extent of prevention and diversion services provided to households at risk of homelessness in the Orange County CoC.
- Collect data that fulfills federal, state and local requirements for homeless reporting and inform system gaps and resource development

II. Policies and Procedures Summary

This document serves as the minimum standards of participation in the Orange County HMIS and represents general best practices. Operational standards in this document are not intended to supersede grant specific requirements and operating procedures as required by funding entities. PATH, HOPWA, and VA providers have operating rules specific to the U.S. Departments of Health and Human Services (HHS) and VA.

The HMIS Lead Agency will update this document at any time when necessary due to HUD or local CoC changes. The latest versions of the HUD HMIS Data Standards Manual and Data Dictionary are the basis for all programming specifications and requirements of HMIS. Updates will be brought to the Lived Experience Advisory Committee (LEAC), Policies, Procedures and Standards Committee (PPS), and the CoC Board for approval. Upon approval, updates to this document will be announced to all Agency Administrators via email and posted on the OC HMIS website. The most recently approved version of this document is the only version that is considered valid and supersedes all previous versions.

III. HMIS Lead Agency Responsibilities

a. Provide HMIS User training as needed.
b. Develop and maintain training materials related to HMIS functionality, privacy and security, and reporting functionality.
c. Develop and maintain all HMIS related forms, including client forms and privacy forms.
d. Create HMIS User accounts and control access to HMIS.
e. Communicate all system-wide changes to Agency Administrators via direct emails, announcements on the OC HMIS website, and/or User Meetings.
f. Resolve HMIS-related grievances that cannot be resolved by the agency working with the client.
g. Host HMIS User Meetings open to all HMIS Users to discuss the use and implementation of HMIS.
h. Host the Data and Performance Management meetings, which are open to all HMIS users, and focus on performance and policies related to HMIS.
i. Provide technical support to Agency Administrators via the HMIS Help Desk.
j. Serve as intermediary between Participating Agencies and the HMIS vendor.
k. Alert the HMIS vendor to all HUD deadlines for data standards changes, required reporting specifications, etc.
l. Complete HMIS software testing, as needed.
m. Submit tickets for technical support to the HMIS vendor on behalf of Participating Agencies when HMIS Lead Agency is not able to resolve a technical issue.
n. Monitor the availability of HMIS to HMIS Users, and inform all users of any planned or unplanned service outages via direct email or announcement on the OC HMIS website.
o. Facilitate access to system level data.
p. Establish HMIS participation fees based on appropriate criteria in collaboration with the CoC Collaborative Applicant and as approved by the CoC Board.
q. Serve as Lead for all HUD-required reporting involving HMIS data (HIC and Sheltered PIT, System Performance Measures, Longitudinal Systems Analysis, etc.).
r. Publish system, agency, and project level reports from HMIS as needed.

IV. Help Desk

a. HMIS Help Desk hours are Monday through Friday from 9AM to 5PM, excluding holidays. Please review the OC HMIS calendar for details regarding holidays and HMIS Helpdesk closure days.

b. Only designated Agency Administrators may submit requests for technical support to the HMIS Help Desk. Run the Agency Active Users report in HMIS to view active Agency Administrators. The methods of contacting the HMIS Help Desk are below. Agency Administrators should not directly contact individual members of the HMIS team.
   a. HMIS Help Desk phone number 714-589-2360
   b. HMIS Help Desk website http://ochmis-211oc.happyfox.com/home

c. HMIS Staff strives to answer all technical support tickets within three (3) business days, but workload, holidays and number of available staff may delay response. Agency Administrators are responsible for raising technical issues in a timely manner, keeping in mind that their request may not be solved same day.
   ~~.~~a. HMIS Staff will provide ~~d a~~ weekly updates for tickets ~~until the ticket is resolved~~ that ~~may~~ take longer than 3 business days to resolve~~d~~. Some examples of tickets that may take additional time: solutions requiring coordination between partner agencies ~~related to HMIS data~~, system error tickets escalated to the HMIS vendor, or tickets pending additional guidance from outside entities, like the OC Collaborative Applicant, the CES Administrator, or ~~the CoC Lead or~~ federal or~~/~~ state technical assistance departments.

d. Client identifying information should never be sent to the HMIS Help Desk. This includes but is not limited to: First Names, Last Names, Dates of Birth, or Social Security Numbers. If ~~you~~ a specific client or screen needs to be referenced, send ~~need to discuss a specific client only~~ the client's HMIS unique ID or a web link of the screen where the error is occurring ~~should be sent~~. ~~Agency Administrators who repeatedly submit client identifying information to the HMIS Help Desk may be subject to corrective action.~~Any client identifying data sent to the HMIS Help Desk will be treated as a data breach, and will follow the procedure outlined later in this document.
   ~~First occurrence: The HMIS Team will send a written reminder explaining what information can and cannot be shared with the Help Desk. The Agency Administrator will complete the HMIS Privacy training. The incident is noted, and the Agency Administrator confirms understanding.~~
   ~~Second occurrence: The HMIS Team will send a formal warning to the agency's Executive Director. The Agency Administrator must complete the HMIS Privacy training and sign acknowledgement.~~
   ~~Third occurrence: The Agency Administrator's HMIS access is temporarily paused and an additional meeting with agency's leadership will be scheduled. The Back Up Agency Administrator will take on the full HMIS responsibilities for their agency. If a Back Up Agency Administrator is not yet designated, the Executive Director will assign a staff.~~
      ~~The Agency Administrator will the paused account will take additional training and complete a compliance plan to regain access to HMIS.~~
   ~~Forth occurrence: If the problems persist, HMIS access may be removed from the Agency Administrator. The agency will need to assign a new administrator and show steps they've taken to prevent this from happening again.~~

- ~~The Back-Up Agency Administrator will take on the full HMIS responsibilities for their agency as the Primary Agency Administrator. A new Back-Up Agency Administrator will be assigned.~~

V. Agency Access

a. In order to be granted HMIS Access, an organization must be able to meaningfully contribute client, service, and housing data as appropriate for individuals and families who are experiencing ~~homelessness~~ or at-risk of homelessness. Organizations are not limited to non-profit service providers, and may include faith-based or community organizations, as well as any other organization that meets the criteria in this section. The organization must contribute data for at least one of the Project Types included in the latest published HMIS Data Standards Manual.

b. An organization that at minimum meets one of the following criteria will be granted access to HMIS:
   a. Manage at least one homeless assistance housing project, including Emergency Shelter, Transitional Housing, and Permanent Housing projects, that will be contributing data to HMIS. Adding these project types to HMIS will increase the CoC's bed coverage which is a priority for the CoC.
   b. Receive ~~federal and/or state~~ funding for the implementation and operations of a homeless assistance project and/or homelessness prevention project that requires HMIS participation.
      i. Organizations receiving funding that requires HMIS participation will be given data entry access, but this does not necessarily include data sharing with other Participating Agencies. Law enforcement agencies and legal service providers receiving funding that requires HMIS participation will be given data entry access only.
      ii. Victim Service Providers and legal service providers that are recipients of funds requiring participation in HMIS, but do not directly enter data into an HMIS, must use a comparable database. A comparable database complies with all HMIS data, technical and security standards, and allows the collection of the aggregate data needed for reporting while respecting the sensitive nature of the client-level information.
      iii. Victim Service Providers receiving CoC Program funds or ESG Program funds may request up to five licenses for read-only access in HMIS for the purpose of care coordination. The Victim Service Provider will be required to pay the User Fee for 1 – 5 users as outlined in the Participating Agency Requirements section.

c. Organizations that do not meet the above listed criteria will be required to complete the HMIS 101 online course and submit an HMIS Access Application for review and consideration by the HMIS Access Working Group as appointed by the Orange County CoC to further evaluate the request. Membership, qualifications, and recruitment process for the Agency Access Working Group are outlined in the next section.
   ~~a. The HMIS Access Working Group will be comprised of three to five CoC General members. Membership to the HMIS Access Working Group is recommended by the current HMIS Access Working Group members, the CoC Collaborative Applicant and the HMIS Lead~~

~~Agency, and the CoC Board approves the appointments. The HMIS Access Working Group will meet monthly or on an as-needed basis for the purposes of evaluating HMIS Access Applications.~~

~~b.~~a. ~~When vacancies occur, the CoC Collaborative Applicant will send an email via the CoC distribution list notifying CoC General Membership of vacancies in the HMIS Access Working Group and soliciting interested participants. Additionally, as needed, the HMIS Access Working Group, CoC Collaborative Applicant and the HMIS Lead Agency will outreach to qualified CoC General Members individually to solicit interested participants. The CoC Collaborative Applicant will confirm interest from CoC General Members to be considered for the HMIS Access Working Group. The HMIS Access Working Group, the CoC Collaborative Applicant and the HMIS Lead Agency will then review all interested candidates to select the most qualified member(s) for the working group to be recommended to the CoC Board for appointment.~~

~~i. Qualifications:~~

~~1. Individual must belong to an agency that is an Orange County CoC General Member or be an Individual General Member~~

~~2.~~1. ~~At least two (2) years of experience with HMIS preferred~~

~~3.~~1. ~~At least two (2) years of experience with the Orange County CoC preferred~~

~~4.~~1. ~~Works collaboratively with others and can provide constructive feedback~~

~~5.~~1. ~~Ability to make informed decisions based on objective analysis of available information~~

~~6.~~1. ~~Desire to positively impact the Orange County CoC~~

~~7.~~1. ~~Understanding of the Orange County CoC's responsibility of promoting access and effective utilization of mainstream programs~~

~~8.~~1. ~~Have the availability to commit to serve a minimum term of one year~~

d. The HMIS Access Application requires organizations to detail how their ~~organization's~~ participation in HMIS will ~~be able to~~ meaningfully contribute information related to homeless assistance projects or homelessness prevention projects to the Orange County CoC, and how ~~the~~ HMIS access will improve the provision of homeless services in the Orange County CoC. The HMIS Access Application will also assist the HMIS Access Working Group to evaluate the organization's HMIS Data Sharing capabilities. The Agency Access Working Group may deny access to HMIS if the organization's activities are not aligned with housing stability or service provision. Reasons for denial may include but are not limited to: the organization does not have an established history of service delivery or outreach, service delivery is inconsistent or sporadic, or the organization doesn't have the capacity to participate fully in HMIS.

e. Organizations that meet the requirements for HMIS Access must be in compliance with all other aspects of the HMIS Policies and Procedures, including the HMIS Participating Agency Agreement and the Data Sharing Agreement.

f. Agencies approved for HMIS access must begin entering data into HMIS within 90 days of approval. After this time the agency's approval will expire and the agency will need to resubmit their application to gain HMIS access.

g. Agencies that are denied access to HMIS by the HMIS Access Working Group may request an appeal. The purpose of the appeal is to ensure the integrity of the review process for the agency's application. Appeals must be submitted to the HMIS Help Desk.
    a. Upon receipt of the appeal, the HMIS Lead Agency will complete the Agency Access Process Review, and determine whether the process was followed appropriately. If all steps of the review process were followed, the decision by the Agency Access Working Group stands. If all steps in the review process were not followed, a sub-set of the Policies, Procedures, and Standards Committee will provide a secondary review and make a final determination regarding the agency's application. This decision cannot be appealed, but agencies denied access to HMIS may re-apply in the future if they can effectively address the reasons their initial application was denied.
h. The HMIS Access Working Group and the HMIS Lead Agency reserve the right to remove HMIS Access if HMIS is not being used to improve service provision for clients or contributing meaningful data to the Orange County CoC.
    a. Examples of unacceptable uses of HMIS include but are not limited to:
        i. Using HMIS data to monitor the whereabouts or service utilization of participants for purposes outside of housing-focused case management
        ii. Using HMIS data outside of a business need
        iii. Using data in HMIS as a reason to not serve a client that is not related to eligibility criteria (ie. substance use history, mental health issues, etc.)
        iv. Sharing client identifying data with persons or groups that don't have access to HMIS

VI. Agency Access Working Group

a. The HMIS Access Working Group will be comprised of three to five CoC General members. Membership to the HMIS Access Working Group is recommended by the current HMIS Access Working Group members, the CoC Collaborative Applicant and the HMIS Lead Agency, and the CoC Board approves the appointments. The HMIS Access Working Group will meet monthly or on an as-needed basis for the purposes of evaluating HMIS Access Applications.
    a. When vacancies occur, the CoC Collaborative Applicant will send an email via the CoC distribution list notifying CoC General Membership of vacancies in the HMIS Access Working Group and soliciting interested participants. Additionally, as needed, the HMIS Access Working Group, CoC Collaborative Applicant and the HMIS Lead Agency will outreach to qualified CoC General Members individually to solicit interested participants. The CoC Collaborative Applicant will confirm interest from CoC General Members to be considered for the HMIS Access Working Group. The HMIS Access Working Group, the CoC Collaborative Applicant and the HMIS Lead Agency will then review all interested candidates to select the most qualified member(s) for the working group to be recommended to the CoC Board for appointment.
        i. Qualifications:
            1. Individual must belong to an agency that is an Orange County CoC General Member or be an Individual General Member
            2. At least two (2) years of experience with HMIS preferred

3. At least two (2) years of experience with the Orange County CoC preferred
4. Works collaboratively with others and can provide constructive feedback
5. Ability to make informed decisions based on objective analysis of available information
6. Desire to positively impact the Orange County CoC
7. Understanding of the Orange County CoC's responsibility of promoting access and effective utilization of mainstream programs
8. Have the availability to commit to serve a minimum term of one year

~~VI.~~VII. Participating Agency Requirements

a. Submit a signed HMIS Participating Agency Agreement
    a. Participating agencies must submit an HMIS Participating Agency Agreement, signed by the agency's Executive Director or equivalent leadership before the agency and/or projects can be set up in HMIS.
    b. On an annual basis, the agreements must be signed during the annual HMIS Agency Audit to have ongoing HMIS access.
b. Executive leadership must confirm the designation of two staff to be assigned the Agency Administrator role at the time of agency setup.
    a. If Agency Administrators must be designated after initial agency setup, executive leadership must contact the HMIS Lead Agency (via the HMIS Help Desk) to notify the HMIS Lead Agency of the new Agency Administrators.
    b. The following information is required of all Agency Administrators:
        i. Full name.
        ii. Work email address that includes the staff name. Personal emails will not be allowed. Shared email accounts or general agency email are also not allowed.
        iii. Work phone number.
c. Comply with all federal, state and local government laws and regulations regarding non-profit data collection, and with all HMIS Policies and Procedures including the latest versions of the HMIS Data and Technical Standards Final Notice and the HMIS Data Standards Manual relating to the collection, storage, retrieval, and dissemination of client information.
d. When applicable, participating agencies may be obligated to comply with the Health Insurance Portability and Accountability Act ("HIPAA"), and/or with 42 CFR Part 2, regarding the confidentiality of substance use disorder patient records. Where possible, these agencies should comply with HIPAA, with 42 CFR Part 2, and with the HMIS Privacy Plan. If it is not possible to reconcile all of the applicable rules, then agencies should comply with the more stringent regulations. Participating Agencies are responsible for ensuring HIPAA and 42 CFR Part 2 compliance.
e. Abide by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA).

f. Participate in an annual HMIS Agency Audit to ensure compliance with the HMIS Policies and Procedures. Review the Agency Audit Form for an overview of the items included in the audit. Please note that the audit form may change to accommodate changes in requirements.
    a. The HMIS Lead Agency will audit all HMIS Participating Agencies on a yearly basis, regardless of funding source. The CoC Collaborative Applicant may also attend audits.
    b. The HMIS Lead Agency will include the audit checklist in the scheduling email sent to the Agency Administrator at least two (2) weeks prior to the audit.
    c. Participating Agencies are expected to be prepared for the audit by completing all items included in the scheduling email.
    d. An Agency Administrator must be present during the audit.
    e. Participating Agencies and the HMIS Lead Agency can request to reschedule the Agency Audit up to one (1) business day before the audit is scheduled. For example, the agency will notify the HMIS Lead Agency by end of day Monday that the agency will need to reschedule an audit for Tuesday. Requests to reschedule or cancellations that occur after that window has passed are considered unsuccessful attempts to contact the Participating Agency. Failing to attend the scheduled audit is also considered an unsuccessful attempt to contact the Participating Agency.
        i. After 2 unsuccessful attempts to contact the agency the HMIS Lead Agency will reach out to the agency's Executive Director or other leadership.
    f. If the agency remains unresponsive after attempting to contact the agency's leadership twice, the agency will fail the audit for that year.
    g. If any deficiencies are found in the audit, the Agency Administrator and the HMIS Lead Agency staff person will agree upon a date that the issue should be resolved by. The Agency Administrator and HMIS Lead may revise the due date if needed. If the corrections are not made by the agreed upon date, the agency will fail the audit for that year.
    h. Agencies that fail their audit will be reviewed by the HMIS Access Ad Hoc to determine the appropriateness of the agency's continued participation in the OC HMIS, and the agency may have HMIS Access revoked.
    i. Agencies that pass their HMIS Annual Audit are confirmed to be in compliance with the HMIS Policy and Procedures, maintain their HMIS access, and will be recognized on the OC HMIS Website ~~on their first pass status.~~ if they passed the audit during their first review.

g. Pay HMIS participation fees based upon CoC Board approved HMIS User License Fee Policy which details the fee structure.
    a. The HMIS User License Fee Policy is applicable to all Participating Agencies participating in the OC HMIS.
    b. Participating Agencies that receive state and/or federal funding that require HMIS participation will be charged for the number of licenses the agency has active at the end of the calendar year, based on the fee structure detailed below:
        i. 1 – 5 users: $750 annually
        ii. 6 – 24 users: $2,750 annually
        iii. 25 or more users: $3,500 annually
    c. Participating Agencies that are Coordinated Entry Access Points (Access Points) will be charged an annual fee of $200 in addition to any user fees they may incur. This applies to

all Access Points, whether or not required to participate in HMIS. The $200 fee will apply to Participating Agencies regardless of the number of Coordinated Entry System components the agency participates in.

d. All Participating Agencies are allowed ~~up to~~ two active Agency Administrators at a time. Participating Agencies will be allowed an additional Agency Administrator for every 700 active enrollments at the end of the calendar year. Participating Agencies that ~~require~~ need ~~additional~~ more Agency Administrators ~~in addition to~~than those outlined in this policy must pay the set-up and ongoing user fees for those accounts, and can contact the HMIS Help Desk for an invoice. The additional Agency Administrators license fee is $759.28 per license annually. This fee is subject to change per vendor licensing fee.

e. Participating Agencies may request standalone Looker licenses for the purposes of scheduling ad hoc reports to be sent to a secure location outside of HMIS. The fee for these licenses is $1,236 per license annually, and is subject to change per vendor licensing fee. This functionality is optional, and not necessary to access the agency's data in HMIS.

f. If an HMIS User has access to multiple agencies in HMIS, only the user's primary agency in HMIS will be charged.

g. Participating Agencies that join HMIS due to newly awarded funding that requires HMIS participation during the calendar year will be required to pay $500 prior to the awarded funding being implemented in HMIS.

h. Complete any reporting, data quality, data entry, or other requirements outlined by the U.S. Department of Housing and Urban Development (HUD), the Coordinated Entry System (CES) Lead, or the HMIS Lead. Agencies can work collaboratively with other HMIS participating agencies to complete reporting, data quality, data entry, other requirements. The CES Lead and HMIS Lead Agency will only request the minimum necessary data and reports.

a. All Participating Agencies in HMIS are included in the HMIS Data Quality Report Cards published on a quarterly basis. The HMIS Data Quality Report Cards are created and posted by the HMIS Lead Agency. Review the Data Quality Monitoring and Reporting Process section of the Data Quality Plan for details regarding this process.

b. Participating Agencies with Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, Homelessness Prevention, or Permanent Supportive Housing/Other Permanent Housing projects are included in the Project Performance reports published on a monthly basis. Review the Orange County CoC Project Performance Overview document for more details on this process.

c. Emergency Shelter, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects are required to participate in the Housing Inventory Count (HIC) that occurs annually on one day during the last 10 days of January.

d. Safe Haven, Emergency Shelter, and Transitional Housing projects are required to participate in the Sheltered Point in Time Count (PIT) that occurs annually on one day during the last 10 days of January.

e. The System Performance Measures (SPM) Report is submitted to HUD on an annual basis, and includes Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects. The reporting period for this report is October 1st through September 30th.

f. The Longitudinal Systems Analysis (LSA) is submitted to HUD on an annual basis, and includes Emergency Shelter, Transitional Housing, Rapid Re-Housing, and Permanent Supportive Housing projects. The reporting period for this report is October 1st through September 30th.

g. Review the HMIS Participating Agencies Schedule for an estimated timeline of activities that HMIS participating agencies may be required to participate in during the course of the year. Exact dates will be shared by the HMIS Lead.

i. Comply with the CoC's minimum participation requirements for HMIS usage. The HMIS Lead Agency will conduct a quarterly review to ensure all agencies are meeting the minimum participation requirements. If any of the following are true at the time of the review, the Participating Agency will have one month to rectify the issue. If the issue is not resolved after one month the HMIS Agency Access Working Group will be notified to determine whether or not the Participating Agency should continue to have access to HMIS. If the Participating Agency is found to not meet the minimum participation requirements during the quarterly review at least three times in a year the HMIS Agency Access Working Group will also be notified.

a. Participating Agency does not have at least one active HMIS User.

b. Participating Agency does not have at least one active enrollment.

c. Participating Agency does not have activity in HMIS in the past 30 days. Activity includes enrollments, services, assessments, files, or exits. (This ~~minimum participation~~requirement is not applicable to Public Housing Authorities)

d. Participating Agency did not submit the HIC and/or PIT for appropriate project types during the previous HIC/PIT reporting period.

e. Participating Agency does not have at least one Agency Administrator that is an active HMIS user.

f. Participating Agency ~~has~~ did not~~not had~~ have staff ~~representation for~~attend at least one HMIS User Meeting during the ~~previous~~ quarter being reviewed.~~.~~ Any staff with an active HMIS account can participate on behalf of their agency.

~~.~~i. Agency Administrators will be required to review the meeting updates and share with the HMIS Users at their agency.~~ir agency's HMIS User. Agencies with missing HMIS Meeting participation for more than two quarters will sign ….~~

j. ~~Organizations~~ Participating Agencies ~~found to not~~that do not meet one or more of the ~~guidelines~~ conditions ~~above~~ in this section ~~may~~ will be contacted by the HMIS Lead Agency to ~~discuss the appropriateness of the agency's continued participation in the OC HMIS~~address any findings. ~~,~~ ~~Participating Agencies will be given the opportunity to address finding in current quarter, complete additional training and/or complete the HMIS Participating Checklist before additional corrective actions will be issued. t~~Any findings that are not addressed will be reported to the ~~The HMIS Lead Agency may inform the~~ HMIS Access ~~Ad Hoc~~Working Group to determine the appropriateness of the agency's continued participation in the OC HMIS, and the organization may have HMIS Access revoked.

~~VII.~~VIII. Agreements and Certifications

a. All Participating Agencies must have updated versions of the documents below on file with the HMIS Lead Agency in order to gain and retain access to the OC HMIS. The forms are available on the OC HMIS website: HMIS Data & Set Up Forms
    a. **Interagency Data Sharing Consent Form** – Allows client-level data and enrollment data to be shared among OC HMIS Participating Agencies. HOPWA funded projects are exempt from the data sharing mandate due to privacy laws protecting clients' HIV status. The Interagency Data Sharing Consent Form must be signed by the Participating Agency's Executive Director or equivalent leadership.
    b. **HMIS Participating Agency Agreement** – Outlines the Participating Agency's responsibilities in protecting client privacy, properly obtaining client consent to share data, monitoring the use of HMIS and reporting any breaches of security by agency staff and improper system use of HMIS. Must be signed by the Executive Director or equivalent leadership.
    c. **User Agreement** – Outlines the HMIS User's responsibilities in protecting client privacy, proper system use and abiding of the HMIS Policies and Procedures. Must be signed during each user's first log-in to HMIS, and must be renewed annually.

~~VIII.~~IX. HMIS User Access Roles

b. Access roles control the level and type of access the user has to functionality within the OC HMIS. HMIS Users with access to OC HMIS will be assigned the Agency Staff, Agency Administrator, or Read Only access role. Agency Staff or Agency Administrator users can also be given CES access.
    a. **Agency Staff:** Users with this access have the ability to add and edit client profiles, enrollments, services, and exits, as well as the ability to run client-level, canned, and ad hoc reports. This level of access is the most common in OC HMIS.
    b. **Agency Administrator:** Users with this access have the same abilities as Agency Staff users, as well as the ability to delete enrollments, services, files, and location data at the user's Primary Agency. The Agency Administrator is responsible to be the first tier of technical support to their agency HMIS Users. After all resources are exhausted, the Agency Administrator will submit an HMIS helpdesk support ticket. Only Agency Administrators are permitted to submit tickets to ensure the request has been reviewed by the responsible parties.
    c. **Read Only:** Users with this access can view client profiles, enrollments, services, and exits, but cannot add or edit data, and they cannot run canned or ad hoc reports.
    d. **CES Access:** Users with CES access have access to the Referrals page, which includes adding clients to the Community Queue, adding and editing housing opportunities, and reviewing or denying matches to housing opportunities.

~~IX.~~X. HMIS User Requirements

a. Agency Staff and Agency Administrator users must complete the following trainings:
    a. HMIS Part 1 Training – Covers the history and purpose of HMIS and the contents of the OC HMIS Policies and Procedures.

b. HMIS Part 2 Training – Covers HMIS functionality, HUD definitions, key terms, and data quality best practices.
c. HMIS Task List – A list of tasks to be completed by the user in the Clarity Training Site to assess what the HMIS User has learned.
d. HMIS Recertification – OC HMIS Users are required to complete an annual HMIS Recertification Training to reinforce HMIS data entry functionality.

b. Agency Administrator users must complete the following trainings in addition to the trainings mentioned in part A of this section:
   a. Agency Administrator Training – Includes a review of the responsibilities of an Agency Administrator.

~~b.~~c. ~~Agency Administrators will be required to take an annual refresher to that covers responsibilities, guidance related to data quality and system updates.~~Read Only users must complete the following training:
   a. HMIS Part 1 Training – Covers the history and purpose of HMIS and the contents of the OC HMIS Policies and Procedures handbook.

~~c.~~d. Users requesting CES Access must complete the following training in addition to the trainings mentioned in part A of this section.
   a. HMIS Coordinated Entry Training – Includes an overview of the different roles involved in the CES process, and a review of the HMIS functionality needed for each role.

~~d.~~e. All HMIS Users must provide the following information in order to receive an HMIS account:
   a. The HMIS User's first and last name.
   b. The HMIS User's *work* email. Personal emails will not be allowed. Shared email accounts are also not allowed.

~~e.~~f. All HMIS Users must be able to clearly explain the purpose and benefit of HMIS and the related HMIS Consent Form to people experiencing or at-risk of experiencing homelessness as detailed in the Client Privacy section. This includes providing an overview of:
   a. What is HMIS?
   b. What personal identifying data will be collected and how it will be used
   c. Privacy and confidentiality standards
   d. Revocation of consent and how to do it

~~X.~~XI. Agency Administrator Requirements

a. Agency Administrators are the designated point of contact for the Participating Agency regarding HMIS related requests and updates. Agency Administrators must complete the Agency Administrator training before being certified as Agency Administrators. This training covers the responsibilities of the Agency Administrator, as well as training on HMIS functionality specific to Agency Administrators. ~~Agency Administrators will be required to take an annual refresher to that covers responsibilities, guidance related to data quality and system updates.~~

b. Agency Administrators must be employed by the Participating Agency, and cannot be volunteers.

~~b.~~c. Agency Administrators are responsible for training all staff at their agency as needed.
   a. Identify staff members who need access to HMIS and ensure they complete any required HMIS User trainings in a timely fashion.

b. Inform the HMIS Help Desk of HMIS Trainings completed by any users at the agency by submitting the HMIS Account Update and Testing Form.

~~.~~i. Agency Administrators must submit the form ~~in a timely fashion~~within 2 business days of the training being completed. ~~User's training completion must be within 60 days of the HMIS Account Update and Testing Form submission to be accepted. If the user's training completion is over 60 days, the users will need to retake the training courses and HMIS Skill Test.~~ Completed trainings are valid for 60 days. If the form is not submitted within 60 days of the training completion, then the user will need to retake the trainings outlined in the HMIS User Requirements section for their desired level of access.

~~c.~~d. Agency Administrators are the primary technical support for their HMIS Users.

a. All HMIS User technical questions should be directed first to the Agency Administrator. If the Agency Administrator cannot solve the problem, Agency Administrators can then contact the HMIS Help Desk. HMIS Users who are not certified Agency Administrators are not allowed to contact the HMIS Help Desk. See the Help Desk Policies section for more details.

~~d.~~e. Agency Administrators are responsible for sharing HMIS updates and other relevant information with all HMIS Users at their agency.

a. Agency Administrators periodically receive emails from the HMIS Lead Agency regarding OC HMIS. Agency Administrators are responsible for reading these emails and communicating the relevant information in them to their staff who are HMIS Users.
b. Agency Administrators should attend the monthly HMIS User Meetings. These webinars are announced via direct email to all Agency Administrators.

f. Agency Administrators must notify the HMIS Lead Agency of all personnel changes using the HMIS Account Update & Testing Form. This includes users that no longer need access to HMIS, as well as users that need a different access role.

a. When an Agency Administrator no longer needs access to HMIS, the form can be submitted by another Agency Administrator at the agency, or by executive leadership. A new Agency Administrator must be identified by the Participating Agency at the time of form submission to ensure proper support for the users at the Participating Agency.

~~.~~b. Forms should be submitted within 2 business days of the personnel change.

~~a. When an HMIS User no longer needs access to HMIS, whether due to changing job responsibilities or departure from the agency, Agency Administrators must complete the HMIS Account Update & Testing Form within 2 business days.~~

~~When there is any changes to user's access role such as a Read Only user that needs to update their role to Agency Staff or when users need to request access to Coordinated Entry (CES). Agency Administrators must complete the HMIS Account Update & Testing Form to request for changes in access role.~~

~~b. When an Agency Administrator no longer needs access to HMIS, whether due to changing job responsibilities or departure from the agency, another Agency Administrator at the Participating Agency or executive leadership is required to submit the contact information of the replacement Agency Administrator via the HMIS Help Desk. within 2 business days.~~

~~f.~~g. Agency Administrators must monitor compliance with standards of confidentiality and data collection, entry, and retrieval outlined in the OC HMIS Policies and Procedures.

a. Inform HMIS Users of obligations to report suspected instances of noncompliance and/or security violations to the Agency Administrator as soon as possible.
b. Escalate any security violations reported by HMIS Users to the HMIS Lead Agency via the HMIS Help Desk.
c. Ensure that all HMIS Users at the Participating Agency are aware that HMIS usernames and passwords are NOT to be shared with anyone under any circumstances. HMIS Users should not share their HMIS login information with other staff at their agency, their Agency Administrator, their executive leadership, their IT Staff, etc.
d. Ensure all HMIS Users at the Participating Agency are able to clearly explain the purpose and benefit of HMIS and the related HMIS Consent Form to clients as included in the HMIS User Requirements section.

~~g.~~h. Agency Administrators are responsible for ensuring that agency technology equipment meets the specifications outlined in the Technical Standards section of this document.

~~h.~~i. Agency Administrators must ensure that agency data quality either meets or exceeds data quality thresholds for each relevant project type or is on track to meet said thresholds.

a. Agency Administrators should be able to describe their agency's regular data quality monitoring procedure. For example, "The Participating Agency runs x, y, and z reports each month. The Agency Administrator identifies data quality errors and delegates corrections to Users x, y, and z." Agency Administrators must review the OC HMIS Data Quality Plan for guidance. The HMIS Lead Agency is available to help develop an agency's data quality monitoring procedure as needed.
b. Agency Administrators must work with the HMIS Lead Agency to ensure the Participating Agency is collecting all relevant Universal and Program Specific Data Elements dependent on project type and funding source.
c. All data entered into the OC HMIS must meet applicable Data Quality and Data Timeliness standards based on project type as agreed by the CoC in partnership with the CoC Board and the CoC Collaborative Applicant.
    i. All HMIS participating agencies regardless of funding must strive to meet the ~~95% or higher~~ data completeness thresholds ~~goal for valid responses. Please review the OC HMIS Data Quality Plan for additional information on local data standards. Each project type has a different data quality threshold.~~outlined for each project type in the OC HMIS Data Quality Plan.
    ~~.~~ii. All HMIS participating agencies regardless of funding must strive to ~~meet the~~enter data into HMIS within 3-business days of the date the information was collected. ~~threshold to enter data into HMIS~~.
d. Agency Administrators are responsible for ensuring the Participating Agency is in compliance with the OC HMIS Data Quality Plan.

~~i.~~j. Agency Administrators must ensure all projects in HMIS are set-up correctly, including the appropriate project type, and kept up to date as changes occur, including changes to ~~which includes but is not limited to ensuring project type,~~ funding, services provided, and ~~and~~ bed inventory ~~is accurate~~information.~~, and~~ Agency Administrators are also responsible for notifying the HMIS Lead Agency when a project is no longer serving clients.

a. Participating Agencies should notify the HMIS Helpdesk when they would like any of their projects to start participation in the OC HMIS. The HMIS Lead Agency and/or the CoC

Collaborative Applicant reserves the right to deny access to agencies and/or projects that do not serve people experiencing or at risk of experiencing homelessness.

b. Agency Administrators are required to notify the HMIS Lead Agency within 5 business days ~~when~~ of project changes ~~have occurred~~occuring. ~~within 5 business days, including changes in funding sources and bed inventory.~~ Agency Administrators will request changes to custom fields, services, funding sources, and bed inventory usinge the forms available ~~for Project Currently Set Up in HMIS~~on the HMIS website. ~~to request for project set up updates.~~

c. The HMIS Lead Agency and/or the CoC Collaborative Applicant will provide technical assistance and recommendations to the agency on how to best set up the project in HMIS to ensure adequate reporting and benefit to the Orange County CoC and its System Performance Measures Report. Projects whose performance and/or data quality negatively affects the CoC as a whole may be subject to corrective action. Corrective action discussed in the Data Quality Plan around performance will be ~~done~~ completed in conjunction with the CoC Collaborative Applicant.

d. Agency Administrators are required to submit a ~~Project Close-Out Form~~Agency/Project Deactivation Form within 15 business days when projects are no longer active, are~~is~~ under renovation for ~~over 30+~~30 days or more, or are temporarily not providing services for ~~over 30+ days~~30 days or more. ~~.~~ The HMIS Lead Agency will deactivate the project in HMIS so no new enrollments can be added to the project. Data from deactivated projects will remain available in HMIS ~~for 7 years per HUD requirements~~for reporting purposes.

   i. ~~Agency Administrators will conduct a project exit procedure and review agency data during the 15-day window. Agency Administrators will work with their agency's HMIS users to address any data quality issues and exit all clients before requesting the project to be deactivated.~~ Before submitting the request to deactivate the project, Agency Administrators will work with HMIS Users at the Participating Agency to review and correct data as needed to ensure data completeness and accuracy. Once all data quality corrections are resolved, all enrollments should be exited.

~~d.~~

~~XI.~~XII. Technical Standards

a. Participating Agencies must adhere to the following technical standards with regards to all technical equipment used to access HMIS. Participating Agencies must also adhere to the HUD HMIS Technical Standards. The HMIS Lead Agency is not responsible for providing proper technical equipment or for providing Information Technology (IT) services unrelated to HMIS.

b. The most recent version of the following web browsers are supported for accessing HMIS:
   a. Google Chrome
   b. Microsoft Edge
   c. Mozilla Firefox
   d. Apple Safari

c. An internet connection is required to access HMIS, and is the sole responsibility of the Participating Agency.

d. All screens must lock within five (5) minutes of inactivity and point to the computer terminal or mobile device login page upon subsequent activity. HMIS Users should manually lock their screen anytime they leave their device unattended.
    a. Windows: Press the Windows + L keys on the keyboard
    b. Mobile device: Briefly press the Power button
    c. Mac: Press Control + Command + Q keys on the keyboard
e. Computers, Tablets, or Other Mobile Devices that access HMIS and/or share a network with computers and/or mobile devices that access HMIS (iPads and other devices that run on iOS are exempt from these requirements)
    a. Must have virus protection software that has been updated in the past week and performs scans daily and automatically updates to the most current version.
    b. Must have a firewall in place between any computer and internet connection for the entire network, be protected with at minimum Wired Equivalent Privacy (WEP), use Network Address Translation (NAT), and maintain the most recent virus security updates.
f. All computer terminals and mobile devices used to access HMIS (including organization network equipment) must be stored in a secure location (i.e., a locked office area that is not accessible to the public).
    a. Participating Agencies must adhere and be consistent with the agency's expectations of information security for staff working at the office full-time. Staff who work remotely will be expected to ensure the protection of proprietary agency and client information accessible from their remote office. Steps include, but are not limited to, the use of locked file cabinets, computers and desks; the regular maintenance of passwords; and any other steps appropriate for the job and the environment. Participating Agencies should be at a minimum in compliance with the OC HMIS Technical Standards and the policies outlined in this document.
g. The executive leadership and/or equivalent leadership within the Participating Agency will be responsible for the maintenance and disposal of onsite computer and mobile device equipment. This includes:
    a. Purchase of and upgrades to all existing and new computer and mobile device equipment for utilization in the system.
    b. Provision of computer terminals or mobile device to all HMIS Users for accessing HMIS that have a unique username/password to log onto the operating system.

~~XII.~~XIII. Privacy

a. HMIS Account Passwords
    a. The HMIS vendor will enforce a password change for all HMIS accounts every 180 days.
    b. HMIS Users shall never share passwords or HMIS accounts for any reason. The sharing of HMIS accounts and/or passwords directly endangers the privacy of clients who entrust their personal identifying information to the OC HMIS. HMIS Users found to be sharing HMIS accounts and/or passwords will be subject to corrective action.
    c. HMIS Users shall never have passwords autosaved on any devices they use to access HMIS. Passwords should be memorized, but if passwords ~~is~~ need to be stored,

agencParticipating Agencies will use a password manager to securely store their user's passwords.

i. OC HMISThe HMIS Lead does not endorse any specific password manager application, but they may be used at the discretion of the Participating Agency and their IT personnel. Proton Pass is shared as a free option that each agency will need to have their IT personnel review and approve use of.

c.d. After 30 minutes of inactivity in the OC HMIS, the system will automatically lock the HMIS User out and will require password re-entry to gain access to HMIS.

d.e. If an HMIS User attempts to log in four (4) times with an incorrect password, the OC HMIS will automatically lock their account. The HMIS User will be unable to access HMIS for two hours unless the Agency Administrator contacts the HMIS Help Desk to unlock the account.

b. Access to HMIS

a. As discussed in the Agency Administrator Responsibilities section, agency staff who no longer need access to HMIS will have their HMIS account access revoked. In the event that HMIS account access is not revoked for any reason, the former HMIS User is required to act with integrity and not attempt to access HMIS if their job duties no longer include HMIS or if they leave the Participating Agency.

b. The HMIS Lead Agency reserves the right to lock the account of an HMIS User who has not completed required trainings. The HMIS Lead Agency will unlock the account once the required trainings have been completed.

c. If an HMIS User does not log into HMIS for 60 days, the HMIS account will be locked automatically. The HMIS User will receive a notification two (2) calendar days prior to the account being locked. If an account is locked due to inactivity, the HMIS User will be required to complete the trainings outlined in the HMIS User Requirements section as well as any other trainings required by the HMIS Lead Agency to regain access to HMIS.HMIS Reactivation Training Course and HMIS Skill Test within 60 days of their account being set to inactive as a minimum requirementsto reactivate the account. Users will additional access will be required to take additional course to regain access to HMIS. After the initial 60 days have past of the user's account being set to inactive, the user will need to retake the HMIS Part 2, HMIS Part 2, HMIS Skill Test and additional courses if applicable.

d. Users that transition from one Participating Agency to another may have their HMIS account reactivated without requiring additional training if the user has logged into their account within the last 60 days, and the user will maintain the same level of access to HMIS. For example, the user had CES Agency Staff access previously will have this same access level with their current primary agency per the Agency Administrators' discretion. The user will have to be re-approved for additional agency. For example, the user will need the CES Lead to approve access to County of Orange to support with CES care coordination.

i. The Agency Administrator at the new agency must submit the Account Update & Testing Form to request the account reactivation. The HMIS Lead will update the email address associated with the account, and change the Participating Agency that the user is employed by.

ii. If the user account was inactive for 60 days, the user will have to retake the HMIS training. Please see Access to HMIS item c for additional information.

c. HMIS Data
   a. Participating Agencies
      i. All HMIS Users are required to ensure that client identifying information is never sent across an unencrypted network, saved in an unprotected folder on a computer, or, in the case of hard copies of client identifying information, stored anywhere other than a locked file cabinet or office.
      ii. Client Identifying Information CANNOT be sent over unencrypted email either between a Participating Agency and the HMIS Lead Agency or between staff at a Participating Agency. The only permissible way to discuss a client over unencrypted email is using the client's HMIS ID number.
      iii. Participating Agencies must have a formal policy for intra-agency communication regarding clients that protects client privacy.
   b. HMIS Vendor
      i. The HMIS Vendor will perform daily and weekly backups to prevent loss of data.
      ii. Backups will be stored both onsite and offsite. All standard security and privacy precautions apply to offsite storage. The offsite storage facility is equipped with surge protectors and natural disaster protective measures.
d. Client Privacy
   a. In order for client records to be shared in HMIS, clients must consent to share their data with other Participating Agencies in HMIS.
      i. If the agency's first interaction with the client is over the phone, or otherwise not in person, clients can verbally consent to share their data. However, during the first in person meeting with the client, the Participating Agency must ask the client to sign the **Client Consent to Share Protected Personal Information Form** to continue sharing their data in HMIS.
         0.1. There may be cases where care coordination and supportive services are offered virtually only, such as scheduling financial assistance for clients that are enrolled in Homelessness Prevention. For these cases, agencythe Participating Agency can request for the client to send the Client Consent to Share Protected Personal Information Form electronically via applications such as DocuSign. AgencyThe Participating Agency will need to upload the signed form into HMIS as confirmation the client consents to share their data with other Pparticipating HMIS Aagencies.
      ii. Participating Agency staff must explain the form to clients and how their information is used and viewed.that signing the form means that the client's record will be shared with other HMIS Participating Agencies for care coordination, and that the client's data may be shared in data requests approved by the CoC Board for analytical use or academic research purposes. The list of HMIS Participating Agencies is available on the OC HMIS website.
      iii. The form can be digitally signed in HMIS, or the Participating Agency can print a physical copy of the form for the client to sign. If the client signs a physical copy, the agency is required to upload the signed consent form to HMIS. If the

Participating Agency chooses to keep physical files, they must be stored in a secure location.

b. Protected Personal Information (PPI) is defined in this manual and the Consent to Share Personal Protected Information form as:
   i. [Clients'] name and [Clients'] contact information
   ii. [Clients'] social security number and date of birth
   iii. [Clients'] basic demographic information such as gender and race/ethnicity
   iv. [Clients'] history of homelessness and housing (including [Clients'] current housing status, and where and when [Clients] have accessed services)
   v. [Clients'] self-reported medical history and disability status, including mental and physical health concerns, substance abuse history, and HIV/AIDS status
   vi. [Clients'] case notes and services
   vii. [Clients'] income sources and amounts; and non-cash benefits
   viii. [Clients'] veteran status
   ix. Information about other members of [Clients'] household
   x. [Clients'] self-reported history of domestic violence
   xi. [Clients'] photo (optional)
c. If clients refuse to sign the **Client Consent to Share Protected Personal Information Form** they cannot be pressured into signing the form or denied services on the basis of their refusal to sign. Participating Agencies should follow the procedure outlined Client Privacy section within the Accessing and Completing Release of Information (ROI) Page Knowledge Base Article for entering client information into HMIS when clients refuse to sign the **Client Consent to Share Protected Personal Information Form**. Refusal to sign the consent form means that all of that client's data is only visible by the Participating Agency serving the client, HMIS System Administrators, and the HMIS Vendor.
d. Upon signing the **Client Consent to Share Protected Personal Information Form** clients must be made aware of their right to revoke their consent to share protected information at any time.
e. Participating Agencies must have copies of the **Revocation of Consent Form** available in areas accessible to clients at all times. Clients should NOT have to request this form from participating agency staff.
   i. If a client submits a **Revocation of Consent Form**, Participating Agency staff must follow the most current procedure for removing sharing access to the client's protected personal information in HMIS. Review the Refusing/Revoking Consent to Share Personal Information knowledge base article for more information.
f. Participating Agencies must post the **Note Regarding Collection of Personal Information** in all areas where staff are collecting data from clients to be entered into HMIS. ~~data entry occurs. P~~Participating Agencies should direct outreach teams to give a copy of the Note to each outreach worker, or ~~and an alternative is the~~ outreach teams should have ~~has~~ a digital copy to share with ~~the~~ clients when ~~conducting case management session~~ collecting data to be entered into HMIS. ~~.~~
g. Participating agencies that maintain a public website must post the **Privacy Notice** on their website.

h. Participating Agencies must have copies of the **HMIS Client Grievance Form** available in areas accessible to clients at all times in the event of an HMIS related grievance. Clients should NOT have to request this form from Participating Agency staff.
   i. In the event that the Participating Agency's grievance policy was not able to resolve the grievance, clients will submit the grievance form directly to the HMIS Lead Agency.

XIV. Client Record Requests

~~e. Client Record Requests~~
   ~~a. Clients requesting specific information from their HMIS record may work directly with any HMIS Participating Agency to obtain that information. The Participating Agency is responsible for verifying the client's identity prior to releasing any information.~~
      ~~i. Any case notes entered into a client's HMIS record may only be shared by the Participating Agency that entered the case notes, and may be released at the discretion of each Participating Agency.~~
      ~~ii. Participating Agencies do not have access to a client's complete record in HMIS, and will only be able to provide the client with information that can be accessed by that specific agency.~~

a. Clients that want to receive their ~~full~~ HMIS record may ~~work with an~~submit their request to an Agency Administrator at any Participating Agency, or they may contact the HMIS Lead directly.
   a. To submit a ticket directly to the HMIS Lead, clients can call the HMIS Help Desk at 714-589-2360. Requests submitted to the HMIS Lead will be responded to in accordance with policies outlined in the Help Desk section of this document.
      i. The HMIS Lead will verify the client's identity in accordance with the procedure outlined for verifying a client's identity virtually in the Client Record Request knowledge base article.
      ii. The HMIS Lead will send the client's record electronically through a Box link, or through the mail at the client's request.
   b. ~~to submit a Client Record Request Form.~~ Requests submitted to Agency Administrators ~~are responsible for submitting the~~must be submitted to the HMIS Lead through the Client Record Request Form ~~to the HMIS Lead on the client's behalf~~. ~~Case notes can only be released by the agency that entered them into HMIS, and will not be included in Client Record Requests submitted to the HMIS Lead.~~
      i. The Participating Agency is responsible for verifying the client's identity prior to submitting the form to the HMIS Lead Agency. Procedures for verifying a client's identity in person or virtually are outlined in the ~~Please review the~~ Client Record Request Knowledge Base article ~~for list of methods to verify the client's identity~~.
      ii. At the time of the request, the Agency Administrator must decide with the client an appropriate method for the client to receive their data that does not violate the privacy of the client's data. Possible methods include providing the record in person, securely sending the record through a content management software like Box, or sending the record by mail.

~~The HMIS Help Desk will respond to the requests as outlined in the HMIS Help Desk Policies section.~~

~~i.~~iii.

~~b.~~c. The HMIS Lead and Agency Administrators must work with the client to determine what type of data they would like to see from their HMIS record at the time the request is received. Only the types of data listed below will be included in Client Record Requests.~~:~~

~~ii.~~i. Client Record Request Dashboard, which includes the following information:

1. Demographics: Client characteristics i.e., Race, Gender, Ethnicity, and Veteran Status

~~1.~~2. Release of Information: Whether or not the client consented to share their data in HMIS, the Participating Agency that collected the consent, and the Start and End date of that consent

~~1.~~3. Enrollment History: List of Participating Agencies and projects that served the client, and the Start and End Dates of those services

~~1.~~4. Uploaded Documents: Documents uploaded into HMIS on the client's behalf i.e., Verification of Homelessness, Disability Verification, etc.

ii. Client responses to assessments completed at entry, exit, or at anytime during their program enrollment(s)

~~ii.~~iii. Data entered by a Participating Agency regarding the client, including Service details~~s Type and Notes~~, Public Alerts, and Locations

iv. Coordinated Entry data, including status, history, and events

~~ii.~~v. Documentation~~s~~ that the client provided or signed ~~will are permitted to be shared with the HMIS Client Record Request~~ (i.e., copy of identification card, self-reported homelessness verification, signed release of information form)~~.~~

~~c.~~a. ~~At the time of the request, the Agency Administrator must decide with the client an appropriate method for the client to receive their data that does not violate the privacy of the client's data.~~

~~c.~~a. ~~The HMIS Help Desk will respond to the requests as outlined in the HMIS Help Desk Policies section.~~

~~b.~~d. ~~An~~ The Client Record Request Form Documentation will be provided to the client at the same time as the client record. The HMIS Lead or Agency Administrators at the ~~agency~~ Participating Agency ~~is~~ are required to review the ~~data~~ documentation with the client upon request, but may not be able to answer specific questions about services provided by another agency. Clients are encouraged to direct questions about services they received to the Participating Agency that provided them. ~~Agency Administrator will review the Client Record Request Form Documentation with the client as the initial step.~~

b. Clients requesting specific information from their HMIS record may work directly with any HMIS Participating Agency to obtain that information. The Participating Agency is responsible for verifying the client's identity as outlined in the Client Record Request knowledge base article prior to releasing any information.

a. Examples of information that may be requested include but are not limited to the client's status in the Coordinated Entry System and copies of documents that were provided by the client.

b. Any case notes entered into a client's HMIS record may only be shared by the Participating Agency that entered the case notes, and may be released at the discretion of each

Participating Agency. Participating Agencies are encouraged to review their liability insurance and the contents of the case notes prior to sharing with a client.

i. Prior to sharing case notes, Participating Agencies must redact identifying third party information, like staff or agency names, names of other clients, or shelter bed numbers.

c. Participating Agencies do not have access to a client's complete record in HMIS, and will only be able to provide the client with information that can be accessed by that specific agency.

~~e.~~c. No client shall have access to another client's data for any reason, except for parents or guardians of a minor requesting their minor child's records.

~~e.~~d. Clients may request edits to data associated with their client profile included in HMIS. Examples of data clients may request edits to include responses to enrollment and assessment questions, and documentation contributed by the client. Data contributed by a Participating Agency, including but not limited to services, case notes, and enrollment history, cannot be edited at a client's request.

~~d.~~a. Clients that wish to edit data for a specific project must contact the agency that administers the project directly to request the edit.

~~d.~~b. Clients cannot request edits for a specific project if the project has closed and/or the agency that administered the project is no longer participating in HMIS.

~~XIII.~~XV. Data Use and Disclosure

a. Client data may be used or disclosed for HMIS system administration, technical support, program compliance, analytical use, and other purposes as outlined in the Privacy Notice or required by state or federal law. Client consent is not required for these uses and disclosures. Uses involve sharing parts of client information with persons within a Participating Agency. Disclosures involve sharing parts of client information with persons or organizations outside a Participating Agency.

b. Participating Agencies may use data contained in OC HMIS to support the delivery of services to clients experiencing homelessness or those at risk of homelessness in Orange County. Participating Agencies may use or disclose client information for administrative functions, technical support, and management purposes. Participating Agencies may also use client information for internal analysis, such as analyzing client outcomes to evaluate programs.

c. The HMIS Vendor and any subcontractor authorized by the HMIS Lead Agency shall not use or disclose data stored in the OC HMIS without expressed written permission from the HMIS Lead Agency in order to enforce information security protocols. If granted permission, the data will only be used in the context of interpreting data for research and system troubleshooting purposes. The Service and License Agreement signed by the HMIS Lead Agency on behalf of the CoC and the HMIS vendor contains language that prohibits access to the data stored in the software except under the conditions noted above.

~~XIV.~~XVI. Data Release

a. Data release refers to the dissemination of aggregate or client-level data for the purposes of system administration, technical support, program compliance, ~~and~~ or analytical use.

b. No identifiable client data, including but not limited to name, Social Security Number, or Date of Birth, will be released by the HMIS Lead Agency or any Participating Agencies to any person, agency, or organization not participating in OC HMIS for any purpose without written permission from the client, with the exception of the uses and disclosures outlined in ~~this document~~~~Section XIII~~the previous section, subpoenas, or other circumstances as required by state and federal law.
c. Each Participating Agency owns the data that is entered and managed by their agency in HMIS. The Participating Agency may not release personal identifiable client data without written permission from the client. Participating Agencies may release aggregate data for all clients to whom the Participating Agency provided services. ~~Agencies may share aggregate data for their agency as a whole, or for each of their projects as outlined in the Data Request Matrix table.~~.
d. Coordinated Entry data is owned by the CES Lead.
    a. Service Providers with access to Coordinated Entry data are not permitted to publish any Coordinated Entry data without approval of the CoC Board as outlined in the Data Request Matrix.~~.~~
    ~~.~~b. The CES Lead and CES Administrators are required to adhere to policies outlined in this section.
e. The HMIS Lead Agency, CoC Collaborative Applicant, CES Lead Agency, and CES Administrators may release aggregate data about the CoC at the program, sub-regional, and regional level. Aggregate data may be released without organization or CoC Board permission.
f. Requests for regional or sub-regional data, including requests for academic research purposes, must be reviewed and approved by the CoC Board prior to the data being released if the request has not been pre-approved according to the Data Request Matrix below. If the request is pre-approved, the CoC Board will be notified that data has been shared at the next scheduled meeting.
g. Requests for data must be submitted to the HMIS Lead Agency by submitting the Data Request Form, which includes the information below. Some request may be required to be reviewed by the CoC Board, and will be added to the meeting agenda as time allows. The HMIS Lead Agency will communicate updated data request timelines ~~with~~to the Requestor.
    a. Requestor's Name
    b. Requestor's Organization
    c. Description of the data needed, including reporting period and specific data elements
    d. Description of what the data will be used for (research, media use, etc)
    e. Will this data be published? If yes, where?
    f. When is the data needed by?
    g. Is this a recurring data request? If so, how often is this data needed?
h. Data requests must intend to facilitate positive impact on the structure or processes within the Orange County Continuum of Care, or otherwise benefit people experiencing homelessness or at risk of homelessness in the Orange County Continuum of Care. Requests must include a local stakeholder or "champion" within the Continuum of Care that will be responsible for sharing the results of the request, and implementing changes within the Continuum of Care as appropriate.
i. Exploratory data requests must include HMIS data as the primary focus of the analysis. Using HMIS data anecdotally in larger analyses will not be permitted.
~~h.~~j. Data Requests for academic research purposes may include client identifying information if the academic research is being conducted by:

a. An individual employed by or affiliated with a Participating Agency for use in a research project conducted under a written research agreement approved in writing by the CoC Collaborative Applicant; or
b. By an institution for use in a research project conducted under a written research agreement approved in writing by the CoC Collaborative Applicant.
c. A research agreement must:
    i. Establish rules and limitations for the processing and security of personal protected information in the course of the research;
    ii. Provide for the return or proper disposal of all personal protected information at the conclusion of the research;
    iii. Restrict additional use or disclosure of personal protected information, except where required by law; and
    iv. Require that the recipient of data formally agree to comply with all terms and conditions of the agreement.

~~i.~~k. Data Requests that seek clarification or require a subset of data that has already been published in the form of a dashboard or as part of another data request as approved by the CoC Board may be provided by the HMIS Lead Agency in consultation with the CoC Collaborative Applicant.

Data Request Matrix

Data Request Criteria	HMIS Participating Agency		Entity Does not Participate in HMIS		CoC Board Sub-Committee/Work Group		CES Administrators[1]	
	Approved	Needs Approval	Approved	Needs Approval	Approved	Needs Approval	Approved	Needs Approval
Aggregate system level data	X			X	X		X	
Program Descriptor data[2]		X		X	X		X	
Client-level data[3]		X		X		X		X
Ongoing data requests	X			X		X	X	
For use as research		X		X	X			X
For media release		X		X		X		X
For other public use		X		X		X		X

[1] CES Administrators include the Agency Administrators at agencies that have been contracted by the CES Lead to manage and facilitate the Coordinated Entry System in HMIS.
[2] Project descriptor data elements (PDDE) are intended to identify the organization, specific project, and project details for each project participating in HMIS. Approved entities may request PDDE for any projects in HMIS.
[3] Client-level data requests from CES Administrators and CoC Board Sub-Committees or Work Groups should be submitted through the HMIS Help Desk, and will be reviewed and approved by the CoC Manager, the CES Lead, and the HMIS Lead.

~~XV.~~XVII. Data Breach

a. A data breach is the unauthorized access or acquisition of data that compromises the security, confidentiality, or integrity of data in HMIS. Data may be in any format (electronic, hardcopy or verbal) and may range from a single piece of data and/or an entire data system.
b. Breaches to the HMIS servers are managed by the HMIS Vendor. If a breach to the HMIS servers occurs, the HMIS Vendor will notify the HMIS Lead Agency, and the HMIS Lead Agency will notify the Participating Agencies as appropriate.
c. Data breaches may also occur at Participating Agencies. The Participating Agency is responsible for immediately mitigating the data breach to the extent possible as soon as the breach is identified, including notifying clients who may have been impacted by this breach. Participating Agencies will make at least 3 attempts over 2 weeks to notify the client impacted by the following methods; telephone, secure email, and mail. The outreach attempts will be documented as case notes in HMIS. Participating Agencies will at a minimum in compliance with the policies outlined in this document. Participating Agencies will be required to also be in alignment with their internal agency policies related to data breach.
    a. Data breaches could include but are not limited to:
        i. HMIS Users sharing HMIS account and/or passwords with others.
        ii. Sharing client identifying information with anyone that doesn't have access to HMIS and/or hasn't been approved to access that data.
        iii. Sharing client identifying information over an unencrypted network.
        iv. Leaving printed documents with client identifying information in an unsecured location.
d. Any suspected data breach must be reported to the HMIS Lead Agency by submitting the Data Breach Incident Report. The HMIS Lead Agency will review the breach and the mitigating actions taken by the Participating Agency, and will assist with any additional action that may be needed.
e. The HMIS Lead Agency will report all data breaches to the HMIS Agency Access Working Group, and the HMIS Agency Access Working Group will determine if any corrective action is needed. Corrective action may include but is not limited to notifying the CoC Board, CoC Collaborative Applicant, and funders of the Participating Agency, and revoking HMIS access.
f. The corrective actions below will be taken for users that commit data breaches. Participating Agencies with repeated data breaches amongst different users will be discussed with the Agency Access Working Group to determine additional corrective actions.
    a. First occurrence: The HMIS Team will send a written explanation of the data breach that occurred to the Agency Administrators. The user that completed the breach will complete the HMIS Privacy training. The incident is noted by the HMIS Lead, and the Agency Administrators at the Participating Agency will confirm understanding.
    b. Second occurrence: The HMIS Team will send a formal warning to the agency's Executive Director. The user must complete the HMIS Privacy training and sign acknowledgement.
    c. Third occurrence: The user's HMIS access is temporarily paused and a meeting with agency's leadership will be scheduled. The user will develop and submit a compliance plan to the HMIS Lead to regain access to HMIS.

~~.~~d. Forth occurrence: The user's access to HMIS will be revoked. After 6 months, the user may request HMIS access after completing the trainings in the HMIS User Requirements section.

~~XVI.~~XVIII. Data Integration

a. Data integration is the process of exporting data from one data system and importing it into another. For the purposes of this policy, data import is the process of taking data from an outside case management database and importing it into HMIS, and data export is the process of taking data out of HMIS and importing it into an outside case management database.
b. Requesting Agencies must be approved for HMIS access before submitting any data integration requests. Requests for data import or export must be submitted through the Data Integration Request Form.
    a. Agencies requesting to integrate their own HMIS data with a case management software will be reviewed and approved by the HMIS Lead Agency.
    b. Agencies requesting to integrate HMIS data from other Participating Agencies that they do not manage will be reviewed and approved by the CoC Board.
    c. Requests to integrate CES data will be reviewed and approved by the HMIS Lead Agency and the CES Lead Agency.
c. All approved data integrations will occur through an Application Programming Interface (API) or other approved integration/systems connector methods. The data integration process ensures that external case management software is securely connected to OC HMIS through a structured pathway. Data from outside systems is first transmitted to Journey DB, an intermediate database, where it is encrypted using Transport Layer Security (TLS) during transmission and AES 256-bit encryption for storage of source code, data, and logs. From there, the data is securely transferred to HMIS, ensuring consistency and compliance with data governance standards.
    a. If the ~~systems~~ ~~database~~ data integration ~~approach~~ will be utilizing a Connector that is not an API, the method will need to be investigated and approved by the HMIS Lead Agency to ensure that the proper security and data integrity protocols are met, and that the integration workflow can accommodate this method. There is no guarantee that all ~~systems~~ connection methods and/or API's can be accommodated.
d. Prior to transferring any data, the HMIS Lead Agency will conduct an Agency and Vendor Review which may include but is not limited to privacy, security, data sharing, data storage, data timeliness, data completeness, and data collection practices.
e. All approved data integrations are subject to an annual review. This review will ensure the data integration is in compliance with the HMIS Policies and Procedures, and that the items included in the Agency and Vendor Review are still in effect. If the review is failed, the data integration will be terminated.
f. Data integrations are subject to all Policies and Procedures outlined in this document. Imported data is owned by the agency responsible for managing the data in HMIS.
g. Violation of any of the policies and procedures in this document may be grounds for termination of the data integration at any time, and is at the discretion of the HMIS Lead Agency. The CoC Board will be notified of any data integrations that have been terminated.

h. The HMIS Lead Agency will provide an estimate for implementation and maintenance fees upon receiving the appropriate data integration request form. If the CoC Board chooses not to cover these fees, the Requesting Agency will be responsible for the fees. Fees will be updated annually by the HMIS Lead Agency, and an annual invoice will be sent for costs of the continuation of data integrations services and support.
i. The Requesting Agency and Outside Database Vendor must agree to the Roles and Responsibilities outlined in this policy as applicable.
j. Approved data integration projects will be scheduled to accommodate the current workload of the HMIS Lead. Scheduling is at the discretion of the HMIS Lead.
k. A critical component of data integration is understanding the responsibilities of those involved in the process. The following participants may be involved in the data integration process. Review the Roles and Responsibilities tables below for the expected responsibilities for each participant. The responsibilities are subject to change and will be finalized when the project plan for the data integration is developed.
    a. Requesting Agency: The Provider that is serving clients directly, and is the responsible party for the data. If the Requesting Agency is requesting a data import, the agency must be participating in HMIS, and must be in compliance with all policies and procedures outlined in this document. If the agency is not already participating in HMIS and does not meet the criteria outlined in the Agency Access section, the agency must submit the Agency Access Application and be approved to access HMIS prior to submitting the Data Import/Export Request Form.
    b. Outside Database Vendor: The entity that provides the technical and administrative support for the ~~outside database~~database being integrated with HMIS. This entity will not be given direct access to HMIS.

Importing Data into HMIS	
Task	**Responsibility**
Submit Data Integration Request Form	Requesting Agency
Determine specifications of import into HMIS (frequency, parameters, data elements, format, etc.)	HMIS Lead Agency and Requesting Agency
Develop project plan	HMIS Lead Agency
Review privacy and consent practices for outside database to ensure client consent to share data in HMIS	HMIS Lead Agency
Review outside database for proper collection of HUD required data and/or custom data	HMIS Lead Agency
Data mapping normalization meeting facilitated by the HMIS Lead Agency	HMIS Lead Agency and Requesting Agency
Data normalized and mapped to operational elements in HMIS	Requesting Agency
Data mapping review	HMIS Lead Agency and Requesting Agency
Prepare data in approved format	Requesting Agency
Review prepared data for accuracy and completeness	Requesting Agency

Submit prepared data to HMIS Lead Agency in approved submission process	Requesting Agency
Review data from Requesting Agency for proper format and completeness	HMIS Lead Agency
Complete import of data into HMIS	HMIS Lead Agency
Review imported data in HMIS and review accuracy and completeness	Requesting Agency
Report any data imported incorrectly to HMIS Lead Agency	Requesting Agency
Resolve any issues with import file and/or requesting database and resend data as needed	Requesting Agency
Resolve any issues with HMIS import and re-upload data as needed	HMIS Lead Agency

Exporting Data from HMIS	
Task	**Responsibility**
Submit Data Integration Request Form	Requesting Agency
Determine specifications of export from HMIS (frequency, parameters, data elements, format, etc.)	Outside Database Vendor, HMIS Lead Agency, and Requesting Agency
Develop project plan	HMIS Lead Agency
Represent and warrant software is in compliance with best practice policies for privacy and security practices	Outside Database Vendor
Represent and warrant software is in compliance with best practice policies for access roles and data sharing	Outside Database Vendor
Represent and warrant software is in compliance with best practice policies for data storage and security infrastructure	Outside Database Vendor
Review entities that will have access to the data in the outside database to ensure compliance with HMIS Policies and Procedures	HMIS Lead Agency
Ensure HMIS Consent Form and related documents name outside database for transparency	HMIS Lead Agency
Export data from HMIS as needed	HMIS Lead Agency
Import data into outside database	Outside Database Vendor
Review imported data in outside database for accuracy/completeness	Outside Database Vendor/Requesting Agency
Notify HMIS Lead Agency of any errors with export data	Outside Database Vendor or Requesting Agency
Resolve any issues with HMIS export and resend data as needed	HMIS Lead Agency
Resolve any issues with outside database import as needed	Outside Database Vendor

OC HMIS Participating Agency Agreement

Purpose

The HMIS (Homeless Management Information System) is a HUD-mandated information technology system that is designed to capture client-level information over time, on the characteristics and service needs of homeless persons. Client data is maintained on a central server, which will contain all client information in an encrypted state. HMIS integrates ~~data~~ information from all homeless service providers and organizations in the community, subject to applicable federal and state laws, client consent requirements, HMIS Policies and Procedures, and applicable data sharing restrictions. ~~and captures basic descriptive information on every person served~~. Participation in the Orange County HMIS (OC HMIS) allows organizations to share information with other participating organizations to create a more coordinated and effective service delivery system. The OC HMIS is the secured electronic database for Orange County and is a valuable resource for local communities.

Agreement and Understanding

This Agreement authorizes this Participating Agency (Agency) to designate HMIS u~~U~~sers ("Users") to access the OC HMIS on behalf of the Agency. A User is an individual authorized by the Agency ~~and approved by 211OC~~ to access the OC HMIS and who has been ~~staff person~~ entrusted to enter Protected Personal Information (PPI) ~~into the OC HMIS,~~ on behalf of this Agency. Users may include employees, contractors, or other individuals authorized by the Agency and approved in accordance with OC HMIS Policies and Procedures. The Agency is responsible for ensuring that each User has a legitimate business need for HMIS access, completes required training, signs the applicable HMIS User Agreement, and complies with all applicable confidentiality, privacy, security, and data use requirements. ~~In order to allow a User to access the OC HMIS, a~~The signed User Agreement must be ~~signed by the User and~~ stored electronically in the HMIS.

Confidentiality and Informed Consent

Confidentiality: This Agency must require all Users to abide by its organization's policies and procedures; uphold all privacy protection standards established by the OC HMIS Policies and Procedures; and comply with all relevant federal and s~~S~~tate of California confidentiality laws and regulations that protect client records.

Except where otherwise ~~provided for~~permitted or required by- law, ~~this~~ the Agency shall ensure that confidential client information is disclosed with ~~records are released with~~ the client's written consent.

Written Consent: ~~To obtain written consent, p~~Prior to each client's initial assessment, the Agency shall inform the~~each~~ client that the Agency collects~~must be~~ information~~ed~~ ~~that the client's information will be entered~~ that is entered into the ~~Orange County Homeless Management Information System (~~OC HMIS~~)~~, an electronic database used to support the delivery, coordination, administration, and reporting of homeless services.~~called HMIS~~. The Agency shall explain the purpose of collecting the client's information, how the information may be used and shared, and the client's rights and choices regarding the sharing ~~terms~~ of ~~the Consent to Share Protected Personal Information (~~PPI~~)~~, consistent with the OC HMIS Privacy Notice, C~~c~~onsent to Share~~d~~ Protected Personal Information form, and OC HMIS Policies and Procedures.

Clients who authorized the sharing of their PPI through the OC HMIS must provide consent by singing the C~~c~~onsent to S~~s~~hare Protected Personal Information form. The Agency shall ensure that client has an opportunity to ask questions and that consent is obtained voluntarily and without coercion.

~~form must also be explained to each client. Clients who agree to have their PPI entered into the OC HMIS must sign the Consent to Share Protected Personal Information form~~.

If the client declines to authorize the sharing of ~~oes not give consent to share~~ their PPI, the Agency shall follow the applicable OC HMIS Policies and Procedure for restricted access records. The Agency may enter the client's ~~ir i~~identifying information ~~can still be entered~~ into HMIS for authorized purposes, and the information will be restricted in accordance with the client's status and applicable OC HMIS Policies and Procedures.~~, but the record will only be visible to the agency entering the data.~~

Verbal Consent: Verbal consent to enter ~~Protected Personal Information (~~PPI~~)~~ into the OC HMIS may be obtained during circumstances where written consent is not reasonably practicable, including ~~such as~~ phone screenings, street outreach, or community access center sign-ins. Before obtaining verbal consent, the~~Each~~ client must be informed that their information will be entered into the HMIS database and must be provided an explanation of the ~~. The terms of the~~ Consent to Share Protected Personal Information ~~requirements~~form.

The Agency shall document the date and~~,~~ method ~~and substance~~ of the client's verbal consent in accordance with OC HMIS Policies and Procedures. Verbal consent may only be used when permitted by law~~y~~, HUD requirements, and OC HMIS Policies and Procedures

~~form must also be explained to each client~~. The client's written consent must be obtained once the client appears for their initial assessment, and their HMIS ~~update the client's HMIS~~ record and consent status must be updated accordingly.~~.~~

Client's Rights

The client has a right to receive a copy of this Agency Agreement at the time of request.

Upon written request, e~~E~~ach client has the right to request~~eceive~~ the following information or records. Subject to applicable law and OC HMIS Policies and Procedure, the Agency shall respond to the request within ~~, no later than ten~~ (10) business days ~~of a written request~~:

- A correction of inaccurate or incomplete PPI;
- A copy of the client's ~~ir~~ consent form;
- A copy of the clien'ts ~~eir~~ HMIS records;
- A current list of participating agencies authorized to~~that have~~ access to HMIS data, as applicable.

Data Use

This Agency must protect HMIS data by ensuring that:

- ~~Maintaining a~~An accessible~~A~~ link to the current OC HMIS Privacy Notice is available on the Agency's ~~is accessed from the Organization's~~ website.
- ~~Ensuring that a~~Access to the OC HMIS is limited to authorized Users with a legitimate business need to access the system. ~~not accessible to unauthorized users~~
- ~~Ensuring that~~ OC HMIS is only accessed through Agency approved devices that meet applicable OC HMIS security requirements. ~~by computers approved by the Organization~~
- ~~Ensuring that a~~All HMIS Users complete~~are~~ training~~ed~~ regarding user responsibilities and conduct.
- ~~Ensuring that~~ HMIS Users sign and comply with the OC HMIS User Agreement.
- ~~Ensuring~~ HMIS Users forward a copy of a client's Revocation of Consent to the HMIS ~~System Administrator~~Lead, Orange County United Way (OCUW)'s 2-1-1 Orange County (211OC), within three (3) business days of receipt.

Responsibilities

As outlined in the 2004 HUD Data and Technical Standards, this Agency is responsible for~~to~~ ensuring~~e~~ that:

- The Notice Regarding Collection of Personal Information is posted at each intake desk or comparable location.
- HMIS Users do not misuse the system.
- Any breach of ~~the~~ a client's PPI that the agency discovers or is made aware of is reported to the client.
- Any HMIS User who ~~finds~~ identifies a possible security lapse in~~on~~ the system must~~is obligated to~~ immediately report it to ~~211OC~~the HMIS Lead.
- A signed copy of the Consent to Share Protected Personal Information is retained for a period of seven (7) years after the PPI was created or last ~~changed~~modified.

Rights and Privileges

OC HMIS data is stored in one central database and is managed by ~~211OC~~the HMIS Lead. While each agency owns it's~~their~~ own data within the database, the Orange County Continuum of Care (CoC) may release aggregate data about the CoC~~its own continuum~~ at the program, sub-regional, and regional level. Aggregate data may be released without ~~organization's~~ the Agency's permission at the discretion of the Co~~Continuum~~. ~~Use of~~Access to the OC HMIS is a privilege granted ~~and is assigned~~ and managed by ~~211OC~~the HMIS Lead.

Copyright

The OC HMIS and other CoC-provided software are protected by copyright and ~~are~~ may not ~~to~~ be copied~~,~~ except as permitted by law or under a~~by~~ contract with the copyright owner~~ of the copyright~~. The number and distribution of copies of any CoC provided software are at the sole discretion of ~~211OC~~the HMIS Lead.

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Violations

Any violations or suspected violations of any of the terms and conditions of this agreement, the HMIS User Agreement, ~~and/~~or the HMIS Policies and Procedures~~,~~ must be immediately and confidentially reported to ~~211OC~~ the HMIS Lead and the Executive Director or other authorized representative of this Agency.

Term

This Participating Agency Agreement shall become~~s~~ effective on the date ~~of final execution~~below and shall remain in effect unless terminated pursuant to ~~paragraph XI. (~~the Amendment and Termination~~),~~ section below.

Amendment and Termination

- The ~~OC~~ CoC reserves the right to amend this A~~a~~greement by providing ~~a~~ three(3) -business days' written notice to this Agency.
- Either party has the right to terminate this A~~a~~greement, with or without cause, upon ~~by providing a~~ three (3)-days' written notice to the other party.
- If this A~~a~~greement is terminated, this Agency shall no longer have access to HMIS or any information contained therein. The CoC shall retain the right to use all client data previously entered by this Agency, subject to any restrictions requested by the client.

All agencies that sign this A~~a~~greement and are granted access to the OC HMIS agree to ~~abide~~ comply with the ~~by~~ OC HMIS~~'~~ Policies and Procedures. The signature of the Executive Director or other authorized representative of this Agency indicates acceptance of all terms and conditions set forth in this agreement.

This Agreement is executed by and between the CoC and the Participating Organization. Upon final execution, this Agency will be given access to the OC HMIS.

Agency Name

_____

Executive Director/Authorized Representative Name
(Print)

_____

Executive Director/Authorized Representative Signature

_____

Date

_____

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OC HMIS Participating Agency Agreement

Purpose

The HMIS (Homeless Management Information System) is a HUD-mandated information technology system that is designed to capture client-level information over time, on the characteristics and service needs of homeless persons. Client data is maintained on a central server, which will contain all client information in an encrypted state. HMIS integrates information from all homeless service providers and organizations in the community, subject to applicable federal and state laws, client consent requirements, HMIS Policies and Procedures, and applicable data sharing restrictions. Participation in the Orange County HMIS (OC HMIS) allows organizations to share information with other participating organizations to create a more coordinated and effective service delivery system. The OC HMIS is the secured electronic database for Orange County and is a valuable resource for local communities.

Agreement and Understanding

This Agreement authorizes this Participating Agency (Agency) to designate HMIS users ("Users") to access the OC HMIS on behalf of the Agency. A User is an individual authorized by the Agency to access the OC HMIS and who has been entrusted to enter Protected Personal Information (PPI) on behalf of this Agency. Users may include employees, contractors, or other individuals authorized by the Agency and approved in accordance with OC HMIS Policies and Procedures. The Agency is responsible for ensuring that each User has a legitimate business need for HMIS access, completes required training, signs the applicable HMIS User Agreement, and complies with all applicable confidentiality, privacy, security, and data use requirements. The signed User Agreement must be stored electronically in the HMIS.

Confidentiality and Informed Consent

Confidentiality: This Agency must require all Users to abide by its organization's policies and procedures; uphold all privacy protection standards established by the OC HMIS Policies and Procedures; and comply with all relevant federal and state of California confidentiality laws and regulations that protect client records. Except where otherwise permitted or required by law, the Agency shall ensure that confidential client information is disclosed with the client's written consent.

Written Consent: Prior to each client's initial assessment, the Agency shall inform the client that the Agency collects information that is entered into the OC HMIS, an electronic database used to support the delivery, coordination, administration, and reporting of homeless services.. The Agency shall explain the purpose of collecting the client's information, how the information may be used and shared, and the client's rights and choices regarding the sharing of PPI, consistent with the OC HMIS Privacy Notice, Consent to Share Protected Personal Information form, and OC HMIS Policies and Procedures.

Clients who authorized the sharing of their PPI through the OC HMIS must provide consent by singing the Consent to Share Protected Personal Information form. The Agency shall ensure that client has an opportunity to ask questions and that consent is obtained voluntarily and without coercion.

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If the client declines to authorize the sharing of their PPI, the Agency shall follow the applicable OC HMIS Policies and Procedure for restricted access records. The Agency may enter the client's identifying information into HMIS for authorized purposes, and the information will be restricted in accordance with the client's status and applicable OC HMIS Policies and Procedures.

Verbal Consent: Verbal consent to enter PPI into the OC HMIS may be obtained during circumstances where written consent is not reasonably practicable, including phone screenings, street outreach, or community access center sign-ins. Before obtaining verbal consent, the client must be informed that their information will be entered into the HMIS database and must be provided an explanation of the Consent to Share Protected Personal Information form.

The Agency shall document the date and method of the client's verbal consent in accordance with OC HMIS Policies and Procedures. Verbal consent may only be used when permitted by law, HUD requirements, and OC HMIS Policies and Procedures

. The client's written consent must be obtained once the client appears for their initial assessment, and their HMIS record and consent status must be updated accordingly.

Client's Rights

The client has a right to receive a copy of this Agency Agreement at the time of request.

Upon written request, each client has the right to request the following information or records. Subject to applicable law and OC HMIS Policies and Procedure, the Agency shall respond to the request within (10) business days:

- A correction of inaccurate or incomplete PPI;
- A copy of the client's consent form;
- A copy of the client's HMIS records;
- A current list of participating agencies authorized to access to HMIS data, as applicable.

Data Use

This Agency must protect HMIS data by ensuring that:

- An accessible link to the current OC HMIS Privacy Notice is available on the Agency's website.
- Access to the OC HMIS is limited to authorized Users with a legitimate business need to access the system.
- OC HMIS is only accessed through Agency approved devices that meet applicable OC HMIS security requirements.
- All HMIS Users complete training regarding user responsibilities and conduct.

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- HMIS Users sign and comply with the OC HMIS User Agreement.
- HMIS Users forward a copy of a client's Revocation of Consent to the HMIS Lead, Orange County United Way (OCUW)'s 2-1-1 Orange County (211OC), within three (3) business days of receipt.

Responsibilities

As outlined in the 2004 HUD Data and Technical Standards, this Agency is responsible for ensuring that:

- The Notice Regarding Collection of Personal Information is posted at each intake desk or comparable location.
- HMIS Users do not misuse the system.
- Any breach of a client's PPI that the agency discovers or is made aware of is reported to the client.
- Any HMIS User who identifies a possible security lapse in the system must immediately report it to the HMIS Lead.
- A signed copy of the Consent to Share Protected Personal Information is retained for a period of seven (7) years after the PPI was created or last modified.

Rights and Privileges

OC HMIS data is stored in one central database and is managed by the HMIS Lead. While each agency owns it's own data within the database, the Orange County Continuum of Care (CoC) may release aggregate data about the CoC at the program, subregional, and regional level. Aggregate data may be released without the Agency's permission at the discretion of the CoC. Access to the OC HMIS is a privilege granted and managed by the HMIS Lead.

Copyright

The OC HMIS and other CoC-provided software are protected by copyright and may not be copied except as permitted by law or under a contract with the copyright owner. The number and distribution of copies of any CoC provided software are at the sole discretion of the HMIS Lead.

Violations

Any violations or suspected violations of any of the terms and conditions of this agreement, the HMIS User Agreement, or the HMIS Policies and Procedures must be immediately and confidentially reported to the HMIS Lead and the Executive Director or other authorized representative of this Agency.

Term

This Participating Agency Agreement shall become effective on the date below and shall remain in effect unless terminated pursuant to the Amendment and Termination section below.

Amendment and Termination

- The CoC reserves the right to amend this Agreement by providing three(3) business days' written notice to this Agency.
- Either party has the right to terminate this Agreement, with or without cause, upon three (3)-days' written notice to the other party.

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- If this Agreement is terminated, this Agency shall no longer have access to HMIS or any information contained therein. The CoC shall retain the right to use all client data previously entered by this Agency, subject to any restrictions requested by the client.

All agencies that sign this Agreement and are granted access to the OC HMIS agree to comply with the OC HMIS Policies and Procedures. The signature of the Executive Director or other authorized representative of this Agency indicates acceptance of all terms and conditions set forth in this agreement.

This Agreement is executed by and between the CoC and the Participating Organization. Upon final execution, this Agency will be given access to the OC HMIS.

Agency Name

_____

Executive Director/Authorized Representative Name
(Print)

_____

Executive Director/Authorized Representative Signature

_____

Date

_____

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Orange County Continuum of Care Homeless Management Information System (OC HMIS)

Note Regarding Collection of Personal Information

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We collect personal information directly from you for ~~reasons~~ the purposes described ~~that are discussed in~~ in our ~~Pprivacy sStatement~~Privacy Notice. We may be required by~~to~~ ~~collect some personal information by~~ law or by organizations that provide funding~~s to operate~~ for this program to collect certain personal information.

Additional ~~Other personal~~ information maybe ~~that we~~ collected as necessary ~~is important~~ to ~~run~~ support~~our~~ program operations, ~~to~~ to improve services for individuals experiencing or at-risk of homelessness ~~persons~~, and to better understand the needs of ~~homeless persons~~individuals and communities ~~those~~ we serve. We ~~only~~ collect only information that is necessary and ~~we consider to be~~ appropriate for these purposes.~~.~~

A copy of the Privacy Notice is available upon request.

Orange County Continuum of Care Homeless Management Information System (OC HMIS)

Note Regarding Collection of Personal Information

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We collect personal information directly from you for the purposes described in our Privacy Notice. We may be required by law or by organizations that provide funding for this program to collect certain personal information.

Additional information maybe collected as necessary to support program operations, to improve services for individuals experiencing or at-risk of homelessness, and to better understand the needs of individuals and communities we serve. We collect only information that is necessary and appropriate for these purposes.

A copy of the Privacy Notice is available upon request.

Data Quality Plan for the Orange County HMIS

Ensuring high-quality data in the Orange County Continuum of Care Homeless Management Information System (OC HMIS) is crucial for understanding the scope of homelessness in our community, ~~understanding its~~assessing system performance, and determining the appropriate strategies and resources to address this problem.

The following Data Quality Plan ~~lays~~ establishes the framework, ~~establishes parameters~~ including standards and processes, and outlines individual responsibilities to improve data quality across projects within the OC HMIS. The Data Quality ~~Improvement~~ Plan includes several key concepts that determine the reliability and ~~the~~ comprehensiveness of ~~our~~ the community's data.

The key components ~~that are encompassed under the concept of data quality are~~of data quality in OC HMIS are data completeness, ~~data~~ bed coverage, unit utilization, data timeliness, data accuracy, and data consistency. This plan is applicable to all projects participating in OC HMIS, regardless of funding source. This plan is also applicable to Victim Services Providers (VSPs) that receive Continuum of Care (CoC) or Emergency Solutions Grant (ESG) Program funds.

Data Quality Components

Data Completeness

Data Completeness refers to the degree to which all required data is known and documented. Bed c~~C~~overage and unit utilization are both forms of completeness. Data completeness is crucial in ensuring that the data recorded ~~information~~ in the OC HMIS accurately represents the population served in projects within the community. Missing data ~~causes~~ creates information gaps that ~~are detrimental to accurate analysis~~can affect the accuracy of ~~the data collected~~analyses completed about Orange County's population experiencing or at-risk of homelessness. Additionally, missing information makes it difficult to ~~deduplicate the number of clients served in the community~~identify unique client records, which distorts ~~our~~ the community's understanding of ~~the extent~~those experiencing or at-risk of homelessness. ~~to which Orange County residents experience homelessness.~~

Data completeness is achieved when all the required data elements ~~are answered~~have been entered for all the clients enrolled in projects within the system. ~~For this purpose~~To support data completeness, Homeless Services Providers should review the *Data Completeness Reports (Appendix A)*, the *Data Quality Corrections Report (Appendix C),* and the *Data Quality Report Cards Dashboard (Appendix E)* on a quarterly basis and should ~~strive to complete missing information per this review as best as their ability.~~identify and address any missing information to the best of their ability.

There are two categories of data elements ~~used~~ collected in HMIS:

1. Universal Data Elements (UDE) - Required of all projects that participate in the OC HMIS.
2. Program Specific Data Elements (PSDE) - Requirements vary by project type and funding source.

The table below ~~shows~~ represents the current d~~D~~ata c~~C~~ompleteness thresholds by project type for each ~~type~~ category of data element collected in HMIS: Universal Data Elements, Program Specific Data Elements at Entry, and Program Specific Data Elements at Exit.

Project Type	UDE	PSDE Entry	PSDE Exit
Coordinated Entry	95%	N/A	N/A
Emergency Shelter	98%	96%	65%
Homeless Prevention	98%	96%	95%

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Permanent Supportive Housing/ Other Permanent Housing	98%	96%	95%
Rapid Re-Housing	98%	96%	95%
Services Only	95%	90%	50%
Street Outreach	95%	90%	50%
Transitional Housing	98%	96%	95%

Table 1: Current Data Completeness Thresholds by Project Type

~~Data~~ Bed Coverage

~~Data~~ Bed Coverage refers to the ~~degree~~ extent to which ~~all~~ Homeless Services Providers within the geographic coverage area of the CoC~~CoC's~~ ~~geographic coverage area~~ enter information about the clients served by their projects ~~all homeless clients' information~~ into the OC HMIS. ~~Providers include those funded by the CoC and ESG Program, federal partner agencies, foundations, and private organizations.~~

~~Data~~ Bed Coverage is essential for a community's ability ~~as it allows it~~ to understand the full~~complete~~ scope of efforts being implemented to address homelessness in Orange County.~~that have been deployed to house Orange County's residents experiencing homelessness~~. Comprehensive participation in the OC HMIS enables the community to better understand the services being provided, identify gaps and areas of need, align resources and strategies, and work collectively toward the goal of preventing and ending homelessness in Orange County. ~~It also allows the community to align efforts and work collectively towards the same goal of preventing and ending homelessness in Orange County.~~

Partial participation ~~of~~ by homeless services providers limits the CoC's ability to assess community wide performance and accurately measure progress toward ending homelessness. When providers do not participate in the OC HMIS or do not enter information for all clients served through their projects, the data available to the CoC may not represent the full scope of homelessness and homeless services within the community.~~in HMIS negatively affects the ability of the CoC to evaluate how the community is performing as a whole towards the goal of ending homelessness.~~

~~Data~~ Bed Coverage is achieved when all Homeless Services Providers ~~of~~ operating within the community, regardless of the funding source, ~~do~~ participate in the OC HMIS and enter ~~all the~~ information ~~from~~ for all clients served by ~~the entirety of their projects into the system~~all applicable projects. ~~In the OC Continuum of Care,~~Bed coverage ~~data~~ is ~~collected and~~ reviewed during the Housing Inventory Count (HIC) that is submitted to the Department of Housing and Urban Development (HUD) every year. ~~The~~ Bed coverage information is also submitted as part of the CoC application process.

The current bed coverage goal ~~that~~ for Orange County ~~has for data coverage~~ is 85% for each project type. ~~In order to reach that rate, partially participating and non-participating providers should be encouraged by the Continuum of Care to start collecting their information into the OC HMIS by emphasizing the benefits that using the system has for the success of their projects' operations and achievements of their goals.~~ To support achievement of this goal, the HMIS Lead continues to discuss data integration with Providers that are not currently participating in HMIS, as well as providing education on the benefits of participation.

~~Bed~~ Unit Utilization

~~Bed~~ Unit utilization refers to the degree to which the total number of homeless beds and units within the OC HMIS ~~is~~ are recorded as occupied divided by the total number of homeless beds and units within the CoC's geographic coverage area. ~~A bed~~Unit utilization ~~percentage~~ between ~~50~~65% and 105% is a good indicator of data quality as it is difficult to gauge the degree of quality in the system's information if the utilization rate is too low (below ~~50~~65%) or too high (105%) without a reasonable explanation.

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A proper utilization rate is important as it allows Orange County to optimize the usage of beds and units that are available for serving the homeless population. An optimal utilization rate can only be obtained when the number of beds and units recorded in HMIS is accurate, which requires providers to enter data into HMIS for every client they serve and exit these clients once they are no longer being served by their projects.

~~Bed and~~ Unit Utilization is reviewed for all Homeless Services Providers' projects within the CoC geographic area annually in the Housing Inventory Count submission to HUD. Additionally, agencies can review their residential projects' utilization on the Project Performance Reports (PPR) that are published by 211OC twice a year for each project type. Moreover, utilization is reviewed as part of the CoC Application. Current thresholds by Project Type are specified in the table below.

For additional information about ~~Bed~~Unit Utilization, please review the Unit Utilization Reports knowledge base article and Project Performance Overview.

Project Type	Utilization
Emergency Shelter	70%
Permanent Supportive Housing	95%
Other Permanent Housing	95%
Transitional Housing	80%

Table 2: Current Utilization Thresholds by Project Type

Data Timeliness

Data Timeliness refers to the ~~degree~~ extent to which the data is collected and entered into OC HMIS within the timeframe necessary for the information to remain current, accurate, and useful. ~~and available when it is needed~~. Timely data entry is ~~indispensable~~ essential because it ensures that the information available in OC HMIS reflects the most current information about clients served by participating projects. ~~for the good performance of the system as it ensures data recorded in HMIS is the most current information on the clients served by participating projects~~. ~~Up-to-date information can only be achieved when the clients' data is entered in HMIS as soon as it is collected. Entering data in a timely manner can reduce human error when too much time has elapsed between data collection and data entry.~~

It is expected for users of the OC HMIS to record intake, exit, and services information in HMIS within **three** ~~**calendar**~~ **business days** of the client's actual Project Start, Project Exit, or Service Provision date, respectively. ~~For this purpose~~To monitor data timeliness, agencies should review the *Data Timeliness Reports (Appendix B)* and the *Data Timeliness* section of the *Data Quality Report Cards Dashboard (Appendix E)* so they can identify ~~how many days on~~the average length of time ~~does~~ it takes to record this data in the system for all projects. Agencies should review these reports at least ~~A minimum of~~ quarterly and use the findings to establish ~~reviews of these materials would facilitate the determination of~~ strategies for reaching the ~~timeliness goal of three days maximum between data collection from clients served and the data's entry into HMIS.~~data timeliness goal.

Data Accuracy

Data accuracy refers to the degree to which data entered in HMIS represents the real information about the clients that are served in the projects contributing data to the system and the services that are provided to clients. Data accuracy depends on the client's ability to provide correct information and the intake worker's ability to document and enter the data accurately. Data accuracy in HMIS is hard to assess and measure as there is no standardized baseline of clients' accurate information.

Given the uniqueness of each agency's operation, all providers should establish their own process for monitoring the data they contribute to the OC HMIS to verify that it reflects clients' information accurately. For this purpose, it is recommended to take into consideration the following steps:

- Establish a simple process for HMIS users to report and correct errors as they are discovered.
- Emphasize to clients and intake staff that it is preferable to enter *"client doesn't know"* or *"data not collected"* than to enter inaccurate information.
- Provide clients with access to review and correct the personal information that has been entered in HMIS.
- Ensure clients' first and last names are spelled correctly and that dates of birth are properly verified by cross checking this information on clients' identification documents when possible.

To support the specific data accuracy monitoring process that each agency establishes, Agency Administrators (AAs) should review the *Data Accuracy Dashboard (Appendix F)* in HMIS. Additionally, to assess accuracy in the system, AAs should review the data issues flagged in the *Data Quality Corrections Report (Appendix C)* and displayed in the *Data Completeness and Accuracy* section of the *Data Quality Report Cards Dashboard (Appendix E).*

Data Consistency

Data consistency refers to the degree to which the data is ~~equivalent in the way it is~~uniformly collected and stored ~~among~~ across all the Homeless Services Providers that participate in the OC HMIS. In order to have consistency in the data, all HMIS users across all agencies need to have the same understanding of what ~~is the clients'~~ information ~~that~~ should be collected, the interpretation of this information, and how it should be collected and entered in ~~the~~ OC HMIS.

Having consistency in the way the data is entered in the system is crucial as it directly affects the accuracy of the clients' information. Furthermore, different interpretations of how to ask data entry questions, or what answers to those questions mean, lead to aggregate information that cannot be correctly interpreted and presented.

In order to standardize and clarify the interpretation of the questions and response options associated with the data elements collected in HMIS, agencies should review the *Data Consistency Cheat Sheets (Appendix F)*. By studying these sheets, data entry staff will be able to have the same understanding of the information that each field is meant to collect. Additionally, HMIS users will know with certainty the impact that the responses to the data elements fields have on their projects' performance.

Data Quality Monitoring and Reporting Process

To promote accountability and ~~In order to~~ ensure a high level of data quality in OC HMIS, it is necessary to establish individual responsibilities for Participating Agencies as well as the HMIS Lead~~/System Administrators~~.

Homeless Services Providers should conduct a regular review of their data completeness, data timeliness, and data accuracy on a quarterly basis. The following section outlines the steps and specific actions to review and improve data quality in the OC HMIS. ~~This process should be completed every quarter.~~

Step 1: ~~211 OC~~HMIS Lead sends Data Quality Corrections to Agency Administrators

- ~~211OC~~ HMIS Lead generates the *Data Quality Correction Report* for all active projects in the OC HMIS using data from ~~for~~ the previous quarter.
- ~~211OC~~ HMIS Lead sends ~~Agency Administrators~~ the *Data Quality Correction Report* to Agency Administrators. ~~which~~ The report flags d~~D~~ata c~~C~~ompleteness and a~~A~~ccuracy errors across fields associated with the Universal Data Elements (UDE) for active enrollments during the previous quarter.

Step 2: Agencies correct missing data/errors in HMIS

- Agencies ~~complete~~ enter missing information ~~where possible~~ and make appropriate corrections to ~~the~~ clients' enrollment records~~s~~ in HMIS ~~according to the DQ errors highlighted in the~~based on the data quality errors identified in the *Data Quality Correction~~s~~ Report*.
- Agencies review the *Data Quality Corrections Reference Guide* ~~to see~~for a description of the data quality errors ~~highlighted~~ identified in the report and ~~see~~ instructions ~~on how to correct~~for correcting identified ~~data~~ issues.
- Victim Service Providers send ~~211OC~~ Data Quality Exports to the HMIS Lead ~~of~~ that include active enrollments in their projects during the previous quarter.

Step 3: ~~211OC~~ HMIS Lead runs and publishes Data Quality Report Cards

- ~~211OC~~ HMIS Lead generates and publishes the *Data Quality Report Cards Dashboard* which assesses d~~D~~ata c~~C~~ompleteness, data a~~A~~ccuracy, and data t~~T~~imeliness for active enrollments during the previous quarter ~~in all the~~across all projects participating in the OC HMIS.
- The *Data Quality Report Cards Dashboard* includes the percentage of data errors and valid responses for each UDE by project, the Average Data Completeness Score for each project, and the average number of days it takes agencies to record intake, exit, and services information in HMIS for each project.

In preparation for the data quality monitoring and reporting process, Agency Administrators are expected to~~should~~ utilize the additional reports and tools ~~that~~ made available by the HMIS Lead ~~211OC has made available~~ to regularly review the data quality in their projects. These reports and tools are ~~explained further~~described in greater detail in the appendices of this document and are also outlined in the *OC HMIS Data Quality Tools* document.

Quarterly Due Dates

The following table specifies the timeframe for each step ~~in~~ of the Data Quality (DQ) Monitoring and Reporting Process.

Quarters	Step 1 ~~211OC~~ HMIS Lead s~~S~~ends DQ Corrections to Agency Administrators	Step 2 Agencies correct DQ errors and missing information in HMIS	Step 3 ~~211OC~~ HMIS Lead publishes Data Quality Report Cards
Q1: 1/1 – 3/31	April 5th	April 18th	April 30th
Q2: 4/1/ – 6/30	July 5th	July 18th	July 30th
Q3: 7/1/ – 9/30	October 5th	October 18th	October 30th
Q4: 10/1 – 12/31	January 5th	January 18th	January 30th

Table 3: Generic Quarterly Due Dates

The date will be changed to the first business day after dates that fall on a holiday or weekend

Incentives and Enforcements

This section describes the actions that the Orange County CoC will take ~~in order to incentivize~~to recognize agencies ~~to have~~that maintain high data quality, and to provide~~the~~ interventions and support ~~needed~~ to ~~assist~~ projects that ~~have not been able to~~do not meet the established data quality thresholds. The implementation of incentives and enforcements will allow the HMIS Lead to ~~prioritize the~~identify projects that ~~need to be assisted with~~may benefit from additional technical support.

Incentives

The following recognition measures may be used to acknowledge agencies that consistently meet established data quality standards:

- Agencies with projects that meet the established data quality thresholds for all four quarters in the calendar year will be ~~shared with~~reported to the CoC Board and recognized
- ~~Agencies with projects that met data quality thresholds for all four quarters in the calendar year will be published~~ on the ~~ochmis.org~~ OC HMIS website.

Enforcements and Technical Assistance

The following interventions will be used to address projects that do not meet established data quality standards:~~:~~

- Projects with at least four data elements under 80% in any quarter will ~~receive~~ be identified for technical support from ~~211OC~~the HMIS Lead.
- Projects targeted for technical support in ~~4~~ four consecutive quarters will be shared with the CoC Board.
- If an agency applies for funding administered or approved by the CoC Board and has projects targeted for technical support in at least four~~4~~ consecutive quarters, the agency will be required to address the identified data quality issues as part of ~~in~~ their application.
- Projects ~~targeted~~ that have been identified for technical ~~support~~ assistance in four~~4~~ consecutive quarters that are not receiving funding that requires HMIS participation will be reviewed by the Agency Access Working Group to determine ~~the appropriateness of the project's continued HMIS participation~~whether continuing participation in OC HMIS is appropriate. Projects ~~removed~~ whose HMIS access was revoked ~~from HMIS~~ may re-apply for HMIS access after three months.

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Appendices

Appendix A: Data Completeness Reports

Completeness reports assess the degree to which all required data elements are answered in HMIS for all the clients to whom these data elements apply. ~~It is recommended for~~ Homeless Services Providers are encouraged to run and review Completeness Reports quarterly ~~in order~~ to identify incomplete or missing information. The following reports are located in the Reports p~~P~~age of HMIS, under the Data Analysis tab in the~~,~~ Data Quality section.

- Universal Data Elements (UDE) Completeness Report:
  This report shows ~~the~~ client responses to the UDE defined by HUD in the HMIS Data Standards. These data elements are required to be collected by all projects participating in the OC HMIS, regardless of funding source.

- Common Program Specific Data Elements (PSDE) Reports:
  - PSDE at Entry Completeness Report:
    This report shows ~~the~~ client responses to the Common PSDE at Project Entry defined by HUD in the HMIS Data Standards. These data elements are collected across most HMIS Federal Partner programs at the start of the clients' enrollments.
  - PSDE at Exit Completeness Report:
    This report shows ~~the~~ client responses to the Common PSDE at Project Exit defined by HUD in the HMIS Data Standards. These data elements are collected across most HMIS Federal Partner programs at the end of the clients' enrollments.

- Federal Partner Program Specific Data Elements:
  The following reports show the client responses to the data elements developed by each Federal Partner and defined by HUD in the HMIS Federal Partner Programs Manual. These data elements can be limited to one or two federal partner programs or a single component of one of the Federal Partner programs.
  - Housing Opportunities for Persons With AIDS (HOPWA) Specific Data Elements:
    This report shows ~~the~~ client responses to the Federal Program Specific Data Elements that ~~need to~~must be collected by HOPWA funded projects as defined in the HOPWA Program HMIS Manual.
  - Projects for Assistance in Transition from Homelessness (PATH) Specific Data Elements
    This report shows ~~the~~ client responses to the Federal Program Specific Data Elements that ~~need to~~ must be collected by PATH funded projects as defined in the PATH Program HMIS Manual.
  - Runaway and Homeless Youth (RHY) Specific Data Elements
    This report shows ~~the~~ client responses to the Federal Program Specific Data Elements ~~that need to~~that must be collected by RHY funded projects as defined in the RHY Program HMIS Manual.
  - Veterans Affairs (VA) Specific Data Elements
    This report shows ~~the~~ client responses to the Federal Program Specific Data Elements that ~~need to~~must be collected by VA funded projects as defined in the VA Program HMIS Manual.

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Appendix B: Data Timeliness Reports

Timeliness reports show the time it takes for Homeless Services Providers to record intake, exit, and services information in the OC HMIS for each ~~project on a~~ client ~~level~~. Reports are also aggregated for each project to determine average data timeliness. It is recommended that these report be~~to~~ run and reviewed ~~these reports every~~ quarterly in preparation for the publication of the Data Quality Report Cards ~~publication~~. The following reports are located on~~in~~ the Reports p~~P~~age of HMIS, under the Data Analysis tab in the~~,~~ Data Quality section.

- Project Start Data Timeliness Report:
  This report shows the number of days ~~taken to record~~between Project Start Date and the date the data was entered ~~data~~ into HMIS for each client enrollment.

- Services Data Timeliness Report:
  This report shows the number of days ~~taken to record Services data~~between the Service Date and the date the data was entered into HMIS for each ~~client enrollment~~service.

- Project Exit Data Timeliness Report:
  This report shows the number of days ~~taken to record~~between Project Exit Date and the date the data was entered into HMIS for each client enrollment.

Appendix C: Data Quality Corrections Report

This report is sent quarterly by ~~211OC~~ the HMIS Lead to all Homeless Services Providers that participate in the OC HMIS. The report flags Data Completeness and Data Accuracy errors across fields associated with the Universal Data Elements (UDE) for all projects. These errors are identified according to the HMIS Reporting Terminology Glossary released by HUD.

There are three types of errors highlighted in the report:

- Client doesn't know/Client ~~Refused~~prefers not to answer, highlighted in orange
  - Agencies~~y~~ are encouraged to review responses for data accuracy. Responses indicating that the c~~C~~lient doesn't know or ~~client~~ prefers not to answer are considered missing data. This will impact agency's overall data quality. Agencies are encouraged to continue to build rapport with the client and explain why the HMIS data elements are collected.~~, a deeper engagement with clients may lead to more rapid movement off the street and placement in housing.~~
- Missing Information, highlighted in gray
- Data Issues, highlighted in magenta

Agency Administrators should review this report, identify all the errors flagged for their projects, and complete and/or correct the appropriate fields for the appropriate client enrollments in HMIS. To identify data quality errors in the *Data Quality Correction Report*, each column in the spreadsheet should be filtered by the colors associated with each type of error. The filtering process pinpoints the exact responses that present errors as well as the clients that present these errors. Additionally, to facilitate the correction process Agency Administrators should review the Data Quality Corrections Reference Guide explained in the next appendix.

Appendix D: Data Quality Corrections Reference Guide

The Data Quality Corrections Reference Guide is available in the HMIS Data Quality section of the OC HMIS website. This guide describes what constitutes a data completeness and accuracy error for all the Universal Data Elements fields on the *Data Quality Corrections Report (Appendix C)*. Data completeness errors include responses such as client doesn't know, client ~~refused~~prefers not to answer, data not collected, and unanswered fields. Data

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accuracy issues include responses that are not valid for each data element according to the HUD Data Standards, as well as responses that ~~present~~ contain data incongruences.

Appendix E: Data Quality Report Cards Dashboard

The data quality report cards are published quarterly by ~~211OC~~the HMIS Lead. They are available on the HMIS Data Quality Report Cards page on the OC HMIS website. This dashboard assesses d~~D~~ata c~~C~~ompleteness, d~~D~~ata a~~A~~ccuracy and d~~D~~ata t~~T~~imeliness for all the projects participating in the OC HMIS. The Data Quality Report Cards are published after agencies make revisions and corrections on their data using the Data Quality Corrections Report.

The first tab of the dashboard, Data Completeness and Accuracy, shows the percentage of data errors and valid responses for each Universal Data Element (UDE) by project. A response is considered valid when it is in accordance with the HUD Data Standards and it is different from "Client doesn't know", "Client ~~Refused~~p~~P~~refers not to a~~A~~nswer", and "Data not c~~C~~ollected." This tab also shows the Average Data Completeness Score for each project, which is a unique indicator of data completeness for each project, calculated by dividing the total valid responses that the project has across all the Universal Data Elements by the total clients that need an answer to each UDE.

The second tab of the dashboard, Data Timeliness, shows the average number of days it takes for H~~h~~omeless S~~s~~ervice P~~p~~roviders to record intake, exit, and services information in HMIS for each project. The client-level data that contribute to the average timeliness calculations can be reviewed by the Agency Administrators by running the Data Timeliness Reports (See Appendix B).

Appendix F: Data Accuracy Dashboard

The Data Accuracy Dashboard is available to Agency Administrators in HMIS. Agency Administrators should review this dashboard monthly for all projects ~~at~~ within their agency ~~in order~~ to identify and correct any client information that is not truthful or accurate. It is important for Agency Administrators to share the dashboard information with all case managers and data intake staff ~~that~~ who are familiar with the client information of each project, so they can identify and report any data in the dashboard that ~~doesn't coincide with the real information of the~~does not reflect the client's actual information ~~clients they serve~~.

Appendix G: Data Consistency Cheat Sheets

The following Data Consistency Cheat Sheets are available on the OC HMIS website. They provide a detailed explanation of critical data elements that ~~need to be collected by the~~ Homeless Services Providers need to collect.

- HMIS Data Element Cheat Sheet: Profile Creation and Enrollment:
  This sheet provides~~gives~~ guidance on how to collect and record client intake and project enrollment information in a standardized and consistent manner. It provides further explanation on the definition of intake and enrollment questions and their response options. Additionally, it offers case managers questions they can use as guides ~~to help collect~~when collecting certain data elements.

- HMIS Data Element Cheat Sheet: Exiting, Annual, and Status Assessments:
  This sheet ~~gives~~ provides guidance on how to collect client status updates and exit information in a standardized and consistent manner. It provides further explanation on the definition of the assessment and exit questions and their response options. It also provides clarification on how to collect Project Exit Date and Destination by project type and lists examples of various scenarios.

- HMIS Data Elements and Reporting Guide:
  This sheet explains ~~the way in which each~~how each data element affects ~~project level and system-wise reports~~reporting in the OC HMIS. It specifies the performance measure in which each data element is used and how missing or inaccurate data can ~~yield~~ result in data issues~~.~~

Appendix H: Sample Agency Data Quality Plan

The Sample Agency Data Quality Plan is a foundation for OC HMIS participating agencies to build upon based on your agency's commitment to comply with the OC HMIS policies for Participating Agency Requirements and contractual reporting requirements.

Please review the Sample Agency Data Quality Plan on the OC HMIS Website.

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Data Quality Plan for the Orange County HMIS

Ensuring high-quality data in the Orange County Continuum of Care Homeless Management Information System (OC HMIS) is crucial for understanding the scope of homelessness in our community, assessing system performance, and determining the appropriate strategies and resources to address this problem.

The following Data Quality Plan establishes the framework, including standards and processes, and outlines individual responsibilities to improve data quality across projects within the OC HMIS. The Data Quality Plan includes several key concepts that determine the reliability and comprehensiveness of the community's data.

The key components of data quality in OC HMIS are data completeness, bed coverage, unit utilization, data timeliness, data accuracy, and data consistency. This plan is applicable to all projects participating in OC HMIS, regardless of funding source. This plan is also applicable to Victim Services Providers (VSPs) that receive Continuum of Care (CoC) or Emergency Solutions Grant (ESG) Program funds.

Data Quality Components

Data Completeness

Data Completeness refers to the degree to which all required data is known and documented. Bed coverage and unit utilization are both forms of completeness. Data completeness is crucial in ensuring that the data recorded in the OC HMIS accurately represents the population served in projects within the community. Missing data creates information gaps that can affect the accuracy of analyses completed about Orange County's population experiencing or at-risk of homelessness. Additionally, missing information makes it difficult to identify unique client records, which distorts the community's understanding of those experiencing or at-risk of homelessness.

Data completeness is achieved when all the required data elements have been entered for all the clients enrolled in projects within the system. To support data completeness, Homeless Services Providers should review the *Data Completeness Reports (Appendix A)*, the *Data Quality Corrections Report (Appendix C),* and the *Data Quality Report Cards Dashboard (Appendix E)* on a quarterly basis and should identify and address any missing information to the best of their ability.

There are two categories of data elements collected in HMIS:

1. Universal Data Elements (UDE) - Required of all projects that participate in the OC HMIS.
2. Program Specific Data Elements (PSDE) - Requirements vary by project type and funding source.

The table below represents the current data completeness thresholds by project type for each category of data element collected in HMIS: Universal Data Elements, Program Specific Data Elements at Entry, and Program Specific Data Elements at Exit.

Table 1: Current Data Completeness Thresholds by Project Type

Project Type	UDE	PSDE Entry	PSDE Exit
Coordinated Entry	95%	N/A	N/A
Emergency Shelter	98%	96%	65%
Homeless Prevention	98%	96%	95%
Permanent Supportive Housing/ Other Permanent Housing	98%	96%	95%
Rapid Re-Housing	98%	96%	95%
Services Only	95%	90%	50%
Street Outreach	95%	90%	50%
Transitional Housing	98%	96%	95%

Bed Coverage

Bed Coverage refers to the extent to which Homeless Services Providers within the geographic coverage area of the CoC enter information about the clients served by their projects into the OC HMIS.

Bed Coverage is essential for a community's ability to understand the full scope of efforts being implemented to address homelessness in Orange County.. Comprehensive participation in the OC HMIS enables the community to better understand the services being provided, identify gaps and areas of need, align resources and strategies, and work collectively toward the goal of preventing and ending homelessness in Orange County.

Partial participation by homeless services providers limits the CoC's ability to assess community wide performance and accurately measure progress toward ending homelessness. When providers do not participate in the OC HMIS or do not enter information for all clients served through their projects, the data available to the CoC may not represent the full scope of homelessness and homeless services within the community.

Bed Coverage is achieved when all Homeless Services Providers operating within the community, regardless of the funding source, participate in the OC HMIS and enter information for all clients served by all applicable projects. Bed coverage is reviewed during the Housing Inventory Count (HIC) that is submitted to the Department of Housing and Urban Development (HUD) every year. Bed coverage information is also submitted as part of the CoC application process.

The current bed coverage goal for Orange County is 85% for each project type. To support achievement of this goal, the HMIS Lead continues to discuss data integration with Providers that are not currently participating in HMIS, as well as providing education on the benefits of participation.

Unit Utilization

Unit utilization refers to the degree to which the total number of homeless beds and units within the OC HMIS are recorded as occupied divided by the total number of homeless beds and units within the CoC's geographic coverage area. Unit utilization between 65% and 105% is a good indicator of data quality as it is difficult to gauge the degree of quality in the system's information if the utilization rate is too low (below 65%) or too high (105%) without a reasonable explanation.

A proper utilization rate is important as it allows Orange County to optimize the usage of beds and units that are available for serving the homeless population. An optimal utilization rate can only be obtained when the number of beds and units recorded in HMIS is accurate, which requires providers to enter data into HMIS for every client they serve and exit these clients once they are no longer being served by their projects.

Unit Utilization is reviewed for all Homeless Services Providers' projects within the CoC geographic area annually in the Housing Inventory Count submission to HUD. Additionally, agencies can review their residential projects' utilization on the Project Performance Reports (PPR) that are published by 211OC twice a year for each project type. Moreover, utilization is reviewed as part of the CoC Application. Current thresholds by Project Type are specified in the table below.

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For additional information about Unit Utilization, please review the Unit Utilization Reports knowledge base article and Project Performance Overview.

Table 2: Current Utilization Thresholds by Project Type

Project Type	Utilization
Emergency Shelter	70%
Permanent Supportive Housing	95%
Other Permanent Housing	95%
Transitional Housing	80%

Data Timeliness

Data Timeliness refers to the extent to which the data is collected and entered into OC HMIS within the timeframe necessary for the information to remain current, accurate, and useful. . Timely data entry is essential because it ensures that the information available in OC HMIS reflects the most current information about clients served by participating projects. .

It is expected for users of the OC HMIS to record intake, exit, and services information in HMIS within **three business days** of the client's actual Project Start, Project Exit, or Service Provision date, respectively. To monitor data timeliness, agencies should review the *Data Timeliness Reports (Appendix B)* and the *Data Timeliness* section of the *Data Quality Report Cards Dashboard (Appendix E)* so they can identify the average length of time it takes to record this data in the system for all projects. Agencies should review these reports at least quarterly and use the findings to establish strategies for reaching the data timeliness goal.

Data Accuracy

Data accuracy refers to the degree to which data entered in HMIS represents the real information about the clients that are served in the projects contributing data to the system and the services that are provided to clients. Data accuracy depends on the client's ability to provide correct information and the intake worker's ability to document and enter the data accurately. Data accuracy in HMIS is hard to assess and measure as there is no standardized baseline of clients' accurate information.

Given the uniqueness of each agency's operation, all providers should establish their own process for monitoring the data they contribute to the OC HMIS to verify that it reflects clients' information accurately. For this purpose, it is recommended to take into consideration the following steps:

- Establish a simple process for HMIS users to report and correct errors as they are discovered.
- Emphasize to clients and intake staff that it is preferable to enter *"client doesn't know"* or *"data not collected"* than to enter inaccurate information.
- Provide clients with access to review and correct the personal information that has been entered in HMIS.
- Ensure clients' first and last names are spelled correctly and that dates of birth are properly verified by cross checking this information on clients' identification documents when possible.

To support the specific data accuracy monitoring process that each agency establishes, Agency Administrators (AAs) should review the *Data Accuracy Dashboard (Appendix F)* in HMIS. Additionally, to assess accuracy in the system, AAs should review the data issues flagged in the *Data Quality Corrections Report (Appendix C)* and displayed in the *Data Completeness and Accuracy* section of the *Data Quality Report Cards Dashboard (Appendix E).*

Data Consistency

Data consistency refers to the degree to which the data is uniformly collected and stored across all the Homeless Services Providers that participate in the OC HMIS. In order to have consistency in the data, all HMIS users across

all agencies need to have the same understanding of what information should be collected, the interpretation of this information, and how it should be collected and entered in OC HMIS.

Having consistency in the way the data is entered in the system is crucial as it directly affects the accuracy of the clients' information. Furthermore, different interpretations of how to ask data entry questions, or what answers to those questions mean, lead to aggregate information that cannot be correctly interpreted and presented.

In order to standardize and clarify the interpretation of the questions and response options associated with the data elements collected in HMIS, agencies should review the *Data Consistency Cheat Sheets (Appendix F)*. By studying these sheets, data entry staff will be able to have the same understanding of the information that each field is meant to collect. Additionally, HMIS users will know with certainty the impact that the responses to the data elements fields have on their projects' performance.

Data Quality Monitoring and Reporting Process

To promote accountability and ensure a high level of data quality in OC HMIS, it is necessary to establish individual responsibilities for Participating Agencies as well as the HMIS Lead.

Homeless Services Providers should conduct a regular review of their data completeness, data timeliness, and data accuracy on a quarterly basis. The following section outlines the steps and specific actions to review and improve data quality in the OC HMIS.

Step 1: HMIS Lead sends Data Quality Corrections to Agency Administrators

- HMIS Lead generates the *Data Quality Correction Report* for all active projects in the OC HMIS using data from the previous quarter.
- HMIS Lead sends the *Data Quality Correction Report* to Agency Administrators. The report flags data completeness and accuracy errors across fields associated with the Universal Data Elements (UDE) for active enrollments during the previous quarter.

Step 2: Agencies correct missing data/errors in HMIS

- Agencies enter missing information and make appropriate corrections to clients enrollment records in HMIS based on the data quality errors identified in the *Data Quality Corrections Report*.
- Agencies review the *Data Quality Corrections Reference Guide* for a description of the data quality errors identified in the report and instructions for correcting identified issues.
- Victim Service Providers send Data Quality Exports to the HMIS Lead that include active enrollments in their projects during the previous quarter.

Step 3: HMIS Lead runs and publishes Data Quality Report Cards

- HMIS Lead generates and publishes the *Data Quality Report Cards Dashboard* which assesses data completeness, data accuracy, and data timeliness for active enrollments during the previous quarter across all projects participating in the OC HMIS.
- The *Data Quality Report Cards Dashboard* includes the percentage of data errors and valid responses for each UDE by project, the Average Data Completeness Score for each project, and the average number of days it takes agencies to record intake, exit, and services information in HMIS for each project.

In preparation for the data quality monitoring and reporting process, Agency Administrators are expected to utilize the additional reports and tools made available by the HMIS Lead to regularly review the data quality in their projects. These reports and tools are described in greater detail in the appendices of this document and are also outlined in the *OC HMIS Data Quality Tools* document.

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Quarterly Due Dates

The following table specifies the timeframe for each step of the Data Quality (DQ) Monitoring and Reporting Process.

Table 3: Generic Quarterly Due Dates
The date will be changed to the first business day after dates that fall on a holiday or weekend

Quarters	Step 1 HMIS Lead sends DQ Corrections to Agency Administrators	Step 2 Agencies correct DQ errors and missing information in HMIS	Step 3 HMIS Lead publishes Data Quality Report Cards
Q1: 1/1 – 3/31	April 5th	April 18th	April 30th
Q2: 4/1/ – 6/30	July 5th	July 18th	July 30th
Q3: 7/1/ – 9/30	October 5th	October 18th	October 30th
Q4: 10/1 – 12/31	January 5th	January 18th	January 30th

Incentives and Enforcements

This section describes the actions that the Orange County CoC will take to recognize agencies that maintain high data quality, and to provide interventions and support to projects that do not meet the established data quality thresholds. The implementation of incentives and enforcements will allow the HMIS Lead to identify projects that may benefit from additional technical support.

Incentives

The following recognition measures may be used to acknowledge agencies that consistently meet established data quality standards:

- Agencies with projects that meet the established data quality thresholds for all four quarters in the calendar year will be reported to the CoC Board and recognized on the OC HMIS website.

Enforcements and Technical Assistance

The following interventions will be used to address projects that do not meet established data quality standards:

- Projects with at least four data elements under 80% in any quarter will be identified for technical support from the HMIS Lead.
- Projects targeted for technical support in four consecutive quarters will be shared with the CoC Board.
- If an agency applies for funding administered or approved by the CoC Board and has projects targeted for technical support in at least four consecutive quarters, the agency will be required to address the identified data quality issues as part of their application.
- Projects that have been identified for technical assistance in four consecutive quarters that are not receiving funding that requires HMIS participation will be reviewed by the Agency Access Working Group to determine whether continuing participation in OC HMIS is appropriate. Projects whose HMIS access was revoked may re-apply for HMIS access after three months.

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Appendices

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Completeness reports assess the degree to which all required data elements are answered in HMIS for all the clients to whom these data elements apply. Homeless Services Providers are encouraged to run and review Completeness Reports quarterly to identify incomplete or missing information. The following reports are located in the Reports page of HMIS, under the Data Analysis tab in the Data Quality section.

- Universal Data Elements (UDE) Completeness Report:
  This report shows client responses to the UDE defined by HUD in the HMIS Data Standards. These data elements are required to be collected by all projects participating in the OC HMIS, regardless of funding source.

- Common Program Specific Data Elements (PSDE) Reports:
  - PSDE at Entry Completeness Report:
    This report shows client responses to the Common PSDE at Project Entry defined by HUD in the HMIS Data Standards. These data elements are collected across most HMIS Federal Partner programs at the start of the clients' enrollments.
  - PSDE at Exit Completeness Report:
    This report shows client responses to the Common PSDE at Project Exit defined by HUD in the HMIS Data Standards. These data elements are collected across most HMIS Federal Partner programs at the end of the clients' enrollments.

- Federal Partner Program Specific Data Elements:
  The following reports show the client responses to the data elements developed by each Federal Partner and defined by HUD in the HMIS Federal Partner Programs Manual. These data elements can be limited to one or two federal partner programs or a single component of one of the Federal Partner programs.
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    This report shows client responses to the Federal Program Specific Data Elements that must be collected by HOPWA funded projects as defined in the HOPWA Program HMIS Manual.
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  - Veterans Affairs (VA) Specific Data Elements
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Appendix B: Data Timeliness Reports

Timeliness reports show the time it takes for Homeless Services Providers to record intake, exit, and services information in the OC HMIS for each client. Reports are also aggregated for each project to determine average data timeliness. It is recommended that these report be run and reviewed quarterly in preparation for the

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publication of the Data Quality Report Cards. The following reports are located on the Reports page of HMIS, under the Data Analysis tab in theData Quality section.

- Project Start Data Timeliness Report:
  This report shows the number of days between Project Start Date and the date the data was entered into HMIS for each client enrollment.

- Services Data Timeliness Report:
  This report shows the number of days between the Service Date and the date the data was entered into HMIS for each service.

- Project Exit Data Timeliness Report:
  This report shows the number of days between Project Exit Date and the date the data was entered into HMIS for each client enrollment.

Appendix C: Data Quality Corrections Report

This report is sent quarterly by the HMIS Lead to all Homeless Services Providers that participate in the OC HMIS. The report flags Data Completeness and Data Accuracy errors across fields associated with the Universal Data Elements (UDE) for all projects. These errors are identified according to the HMIS Reporting Terminology Glossary released by HUD.

There are three types of errors highlighted in the report:

- Client doesn't know/Client prefers not to answer, highlighted in orange
  - Agencies are encouraged to review responses for data accuracy. Responses indicating that the client doesn't know or prefers not to answer are considered missing data. This will impact agency's overall data quality. Agencies are encouraged to continue to build rapport with the client and explain why the HMIS data elements are collected.
- Missing Information, highlighted in gray
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Agency Administrators should review this report, identify all the errors flagged for their projects, and complete and/or correct the appropriate fields for the appropriate client enrollments in HMIS. To identify data quality errors in the *Data Quality Correction Report*, each column in the spreadsheet should be filtered by the colors associated with each type of error. The filtering process pinpoints the exact responses that present errors as well as the clients that present these errors. Additionally, to facilitate the correction process Agency Administrators should review the Data Quality Corrections Reference Guide explained in the next appendix.

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Appendix E: Data Quality Report Cards Dashboard

The data quality report cards are published quarterly by the HMIS Lead. They are available on the HMIS Data Quality Report Cards page on the OC HMIS website. This dashboard assesses data completeness, data accuracy

and data timeliness for all the projects participating in the OC HMIS. The Data Quality Report Cards are published after agencies make revisions and corrections on their data using the Data Quality Corrections Report.

The first tab of the dashboard, Data Completeness and Accuracy, shows the percentage of data errors and valid responses for each Universal Data Element (UDE) by project. A response is considered valid when it is in accordance with the HUD Data Standards and it is different from "Client doesn't know", "Client prefers not to answer", and "Data not collected." This tab also shows the Average Data Completeness Score for each project, which is a unique indicator of data completeness for each project, calculated by dividing the total valid responses that the project has across all the Universal Data Elements by the total clients that need an answer to each UDE.

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The Data Accuracy Dashboard is available to Agency Administrators in HMIS. Agency Administrators should review this dashboard monthly for all projects within their agency to identify and correct any client information that is not truthful or accurate. It is important for Agency Administrators to share the dashboard information with all case managers and data intake staff who are familiar with the client information of each project, so they can identify and report any data in the dashboard that does not reflect the client's actual information.

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  This sheet provides guidance on how to collect and record client intake and project enrollment information in a standardized and consistent manner. It provides further explanation on the definition of intake and enrollment questions and their response options. Additionally, it offers case managers questions they can use as guides when collecting certain data elements.
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  This sheet provides guidance on how to collect client status updates and exit information in a standardized and consistent manner. It provides further explanation on the definition of the assessment and exit questions and their response options. It also provides clarification on how to collect Project Exit Date and Destination by project type and lists examples of various scenarios.
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  This sheet explains how each data element affects reporting in the OC HMIS. It specifies the performance measure in which each data element is used and how missing or inaccurate data can result in data issues

Appendix H: Sample Agency Data Quality Plan

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Sample Data Quality Plan for Agencies

The following is a sample Data Quality Plan OC HMIS Participating Agencies can use as a foundation to build their own plan that works for their needs. Agency Administrators should consider staffing capacity, the amount of data the Participating Agency has in HMIS, and contractual reporting requirements when developing their own plan. The HMIS Lead is available to assist with developing a Participating Agency's Data Quality Plan as requested.

Step 1: Develop Data Quality Monitoring Team and assign roles.

- Agency Administrators are responsible for managing the agency's data, and should lead this effort. Agency Administrators will run reports and send corrections to Program Managers.
- Program Managers or Team Leads will review corrections sent by the Agency Administrators, and assign corrections to staff.
- Staff will update data in HMIS as needed.

Step 2: Develop the Data Quality Plan.

- The following reports should be reviewed monthly.
    - Canned Reports: Reports are available on the Report Library page under the sections below.
        - Program Based Reports
            - [GNRL-220] Program Details Report – Verify enrollment, assessment and exit data has been entered correctly. Staff should review the data they entered and confirm accuracy.
    - Looker Reports/Dashboards: Reports are available on the Data Analysis page under the sections below.
        - Built In Reports
            - Data Quality Dashboard – Address any errors highlighted in each report. Review the Data Quality Dashboard article for more details.
        - Orange County Clarity System Reports
            - Data Accuracy Dashboard & Details – address any errors highlighted in each report. Review the Data Accuracy Dashboard article for more details.

- The following reports should be reviewed quarterly.
    - Review and complete quarterly data quality corrections sent by the HMIS Lead. Review email for additional information on these corrections.
    - Canned Reports: Reports are available on the Report Library page under the sections below.
        - Data Quality Reports
            - [DQXX-110] Duplicate Clients – Review client records to determine if duplicate profiles have been created for the same client. Additional

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HMIS User training around proper data collection may be needed if there are a high number of duplicate clients. HMIS Users are encouraged to review the Searching For a Client Record Knowledge Base article for additional guidance.

- Looker Reports/Dashboards: Reports are available on the Data Analysis page under the sections below.
  - Orange County Clarity System Reports
    - Agency Set-Up Review – Review the set-up of projects in HMIS, including project type, project location, bed inventory, and funding sources. This review is critical for accurate reporting. Review the Agency Set-up Review Dashboard article for additional details.

Step 3: Train Data Quality Monitoring Team.

- Review the Participating Agency's Data Quality Plan and incorporate any feedback.
- Review and confirm each team members' responsibilities.

Step 4: Implement the plan.

- Add calendar reminders when reports should be pulled, and when corrections are due.
- Provide staff two to three weeks to review and correct data in HMIS.
- Run the reports on the 1st of the month to be in alignment with HMIS Lead reporting schedule.
- When running monthly reports, review the reports to confirm that the corrections assigned the previous month have been addressed. Flag any errors that were not made for staff correction.
- For quarterly reports, run the reports after the deadline to verify all corrections have been addressed, and reissue any pending corrections.

Step 5: Review errors for trends and work with Data Quality Monitoring Team to develop internal training for staff to avoid common errors.

- Submit a suggestion to the HMIS Helpdesk for training topics.
- Review available training materials and share with staff.
  - Knowledge Base Library: https://ochmis-211oc.happyfox.com/home/
  - Data Quality Tools: https://ochmis.org/data-quality/
  - Trainings: https://ochmis.org/hmis-monthly-training-webinars/
  - Meetings: https://ochmis.org/meetings/user-meeting-minutes/
  - Guides: https://ochmis.org/hmis-cheat-sheets/

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Business Calendar
Agenda Item 3

Date: October 13, 2026

Subject: Continuum of Care (CoC) Strategic Plan: CoC Public Engagement and Advocacy Policy

Background and Analysis

The CoC adopted its strategic plan on December 18th, 2024. In the CoC's strategic plan, priority 4 is to "Develop or adopt a policy agenda and priorities to measurably improve the resources and performance of the CoC." CoC Board Members, Becks Heyhoe-Khalil and Nichole Gideon were appointed as the Strategy Owners to advance this and Alejandro Santiago from Orange County United Way has also been providing support.

To date the following milestones have been completed:

- A draft workplan and scope for this strategy was created that set boundaries for what the ultimate policy agenda could include based on research from other CoCs across the country. The first draft was based on the Maricopa CoC Advocacy Policy.
- In April 2026 this was presented to the Strategic Plan Working Group (WG) for their feedback on the types of advocacies they were interested in. This was followed up with an email survey to continue to get feedback.
- July 2026, based on the WG feedback, a draft policy agenda was created for the next round of feedback.
- On August 24, 2026, there was a meeting with the Office of Care Coordination to discuss the progress in the draft and to collect their feedback.
- During the month of September, the policy agenda strategy team worked to incorporate the feedback from the Office of Care Coordination and the WG into a draft framework.

The Policies, Procedures and Standards Committee is being asked to engage in discussion on two questions to help move the draft framework forward.

1. Are there advocacy activities the Orange County CoC Board should categorically NOT participate in?
2. What types of advocacy requests should the CoC Board be willing to consider participating in?

Following the Committee's feedback, we will walk through the proposed advocacy protocols and discuss how the process could work in practice.