

# **MeckHMIS Operating Policies and Procedures**

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# 2024 Mecklenburg County Homeless Management Information System (Meck HMIS) Operating Policies and Procedures

The purpose of an HMIS project is to:

- Record and store client-level information about the numbers, characteristics and needs of persons who use prevention, coordinated entry, housing for persons experiencing homelessness and supportive services.
- Produce an unduplicated count of persons experiencing homelessness for each Continuum of Care.
- Understand the extent and nature of homelessness locally, regionally and nationally.
- Understand patterns of service usage and measure the effectiveness of projects and systems of care.

These are the minimum standards of operation for the Meck HMIS Project. **The following operating policies and procedures apply to all participating agencies in Mecklenburg County. (Contributing HMIS Organizations – CHOs).**

## KEY TERMS AND ACRONYMS:

Term	Acronym (if used)	Brief Definition
42 CFR Part 2	<b>Part 2</b>	42 CFR Part 2 is the federal regulation governing the confidentiality of drug and alcohol use treatment and prevention records. The regulations are applicable to certain federally assisted substance use treatment programs. This law limits use and disclosure of substance use patient records and identifying information.
By-Name List	<b>BNL</b>	A By-Name List is a list of persons experiencing homelessness within a specific CoC. By-Name Lists can be comprehensive, meaning they include all homeless persons, or focused, meaning they contain persons with certain subpopulation, (ex. chronic or veteran), or prioritization characteristics. By-Name Lists are frequently used within collaborative multi-partner meetings known as case conferencing sessions to link appropriate homeless persons with housing opportunities that best meet their needs.
Continuum of Care	<b>CoC</b>	A federally recognized planning body charged with guiding the local response to homelessness.
Contributing HMIS Organizations	<b>CHO</b>	An organization that participates on the HMIS.
Coordinated Entry System	<b>CE</b>	A functioning coordinated entry system is now required for all CoCs receiving HUD funding, per the HUD CoC Program Interim Rule. Each CoC must develop a plan/system based on their local providers and available resources. The objective of Coordinated Entry is to ensure that access to homeless resources is optimized and based on a standardized assessment of need.
Coverage Rate		Coverage rate refers to the percentage of the homeless population in a geographic area that is captured in the HMIS, divided by the total number of homeless persons in that geographic area. Coverage rates are used to project a total homeless count if there are homeless service agencies that do

		not participate in Meck HMIS. (These may include persons served in Domestic Violence Providers or other non-participating Shelters or Outreach Projects.)
Data Use Agreement/Administrative Qualified Services Organization Business Associates Agreement	<b>Data Use Agreement /Admin QSOBAA</b>	The agreement signed by each CHO and the HMIS Lead Agency that defines core privacy practices between participants on the Meck HMIS.
The Emergency Solutions Grant Program	<b>ESG</b>	<p>The Emergency Solutions Grant Program funds homeless services in five program areas:</p> <ul style="list-style-type: none"> <li>• street outreach</li> <li>• emergency shelter</li> <li>• homelessness prevention</li> <li>• rapid re-housing assistance</li> <li>• HMIS</li> </ul> <p>ESG Funds are typically allocated to a state agency from HUD or to local government for use within their jurisdictions.</p>
The Health Insurance Portability and Accountability Act of 1996	<b>HIPAA</b>	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 (PHI) held by covered entities and business associates. HIPAA is the base operational privacy rule on which the Meck HMIS privacy rule is structured. HIPAA was amended by the HITECH Act – or Health Information Technology for Economic and Clinical Health Act in 2008.
Homeless Definition		<p><b>The HEARTH Act defines 4 categories of homelessness.</b> Not all projects can serve all categories, and some may utilize a different definition when delivering services. Meck HMIS has adopted the HUD definition for counting persons experiencing homelessness.</p> <ul style="list-style-type: none"> <li>• Category 1: Literally Homeless</li> <li>• Category 2: Imminent Risk of Homelessness</li> <li>• Category 3: Homeless under other Federal Statutes</li> <li>• Category 4: Fleeing/Attempting to Flee DV</li> </ul>
Homeless Management Information System	<b>HMIS</b>	A data system that meets HUD’s HMIS requirements and is used to measure homelessness and the effectiveness of related service delivery systems. The HMIS is also the primary reporting tool for HUD homeless service grants as well as for other public streams of funding related to homelessness.
Housing Inventory Count	<b>HIC</b>	The HIC is where all residential projects (both HMIS participating and non-participating) specify the number of beds and units available to homeless persons within a CoC. The numbers are recorded in the agency’s HMIS provider pages, (for Meck HMIS participating projects), or in “shell” provider pages for non-HMIS participating agencies.
Length of Stay	<b>LOS</b>	The number of days between the beginning of services and the end of services, or in the case of permanent housing, the number of days between the housing move in date and the exit from housing. Length of stay is calculated using project start and exit dates, shelter stay dates, or for permanent housing, the housing move-in date and project exit. Meck HMIS offers calculations for discrete stays as well as the total stays across multiple sheltering events.
HMIS Lead Agency		The HMIS Lead Agency is the agency that fills the following roles for a CoC, (if applicable)

		<ul style="list-style-type: none"> <li>• Holds the CoC’s HMIS Grant, or is funded by other dollars (such as ESG) to support CoC wide HMIS activities.</li> <li>• Employs the Local System Administrator for the CoC.</li> <li>• Is responsible for overseeing the completion of all required federal and state reporting tasks within the CoC, which involve data from the HMIS.</li> </ul>
Longitudinal System Analysis	<b>LSA</b>	The Longitudinal Systems Analysis (LSA) report is produced from a CoC’s <a href="#">Homelessness Management Information System</a> (HMIS) and submitted annually to HUD via the HUD <a href="#">HDX 2.0</a> . It provides HUD and Continuums of Care (CoCs) with critical information about how people experiencing homelessness use their system of care.
Meck HMIS Governance Committee	<b>MGC</b>	The Mecklenburg County Governance Committee provides oversight of the CoC’s HMIS project.
Mecklenburg County HMIS	<b>Meck HMIS</b>	Mecklenburg County’s CoC HMIS Name
Participation Agreement		The agreement between Meck HMIS participating agencies and Mecklenburg County CSS that specifies the rights and responsibilities of CSS and participating agencies.
Point in Time Count	<b>PIT</b>	An annual count, usually in the last week of January that is required for all CoCs. In odd numbered years, the PIT Count must include an “unsheltered” or street count.
Project Types		<p><b>HUD defines 13 Project Types in HMIS:</b></p> <ul style="list-style-type: none"> <li>• CE: Coordinated Entry - A project that administers the continuum's centralized or coordinated process to coordinate assessment and referral of individuals and families seeking housing or services, including use of a comprehensive and standardized assessment tool.</li> <li>• Day Shelter – A facility/center for persons experiencing homelessness that does not provide overnight accommodations.</li> <li>• ES: Emergency Shelter- Overnight shelters or shelters with a planned length of stay of less than 3 months.</li> <li>• HP: Homeless Prevention- A project that helps those who are at imminent risk of losing housing, to retain their housing.</li> <li>• Other: A project that offers services, but does not provide lodging, and cannot otherwise be categorized as another project type.</li> <li>• PH: Permanent Supportive Housing- Permanent Supportive Housing includes both services and housing. Permanent Supportive Housing requires a disability for entry and often serves persons who are chronically homeless.</li> <li>• PH: Housing Only - Permanent housing may be supported by a voucher but does not have services attached to the housing.</li> <li>• PH: Housing with Services (no disability required) – Permanent Housing that provides both housing and supportive services but does not require a disability to be served by the project.</li> <li>• PH: RRH Rapid Rehousing- A project that rapidly rehuses those that are identified as literally homeless.</li> <li>• SH: Safe Haven – A project that offers supportive housing that serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services. It also provides 24-hour residence for eligible persons for an unspecified period, has an overnight capacity of 25 or</li> </ul>

		<p>fewer people and provides low demand services and referrals for residents.</p> <ul style="list-style-type: none"> <li>• SO: Street Outreach Project- A project that serves homeless persons that are living on the street or other places not meant for habitation.</li> <li>• SSO: Services Only Project- A project that serves persons only, with no residential component. These projects often provide case management and other forms of support and meet with clients in an office, at the client’s home, or in a shelter.</li> <li>• TH: Transitional Housing- Transitional environments with a planned length of stay of not more than 2 years that provide supportive services</li> </ul>
Protected Health Information	<b>PHI</b>	Protected Health Information is any information in a record that can be used to identify an individual, and that was created, used, or disclosed in the course of providing a health care service, such as a diagnosis or treatment. PHI includes diagnoses, medical treatment plans, medical assessments and tests, medical record number, any health or medical information pertaining to the client.
Protected Personal Information	<b>PPI</b>	Protected Personal Information is a category of sensitive information that is associated with an individual. It should be accessed only on a strict need-to-know basis and handled and stored with care. Before any portion of the HMIS client record, outside of the Client Profile, can be shared, a Sharing QSOBAA and a client signed release of information must be in place. PPI includes client name, social security number, date of birth, address,
Release of Information	<b>ROI</b>	A Release of Information comes in two forms, a paper ROI and an electronic ROI. A signed (paper) ROI giving informed client consent for sharing is also required to share data between agencies. An electronic ROI must be completed to share a client’s data on the HMIS.
Sharing		In an HMIS context, sharing refers to the exchange of client data between agencies. External data sharing requires a Sharing QSOBAA between two or more agencies, and a client signed Release of Information authorizing the sharing of that client’s information. Data entry (internal sharing) does not require a client signed ROI as there is implied consent for the agency to keep records when a client provides information.
Sharing Qualified Services Organization Business Associates Agreement	<b>Sharing QSOBAA</b>	The Agreement between agencies that elect to share information using the HMIS. The Agreement prevents the re-release of data and, in combination with the Participation Agreement, defines the rules of sharing.
SSI/SSDI Outreach, Access and Recovery	<b>SOAR</b>	Using the national “best practice” curriculum, the SOAR project reduces barriers and supports the application for Social Security Benefits for the disabled homeless population.
System Performance Measures	<b>SPMs</b>	The System Performance Measures are a series of seven standardized measures which help communities gauge their progress in preventing and ending homelessness and provide a more complete picture of how well a community is achieving this goal. SPMs look at items such as length of time spent homeless, exits to permanent housing destinations and returns to homelessness.
User Agreement & Code of Ethics		The document each HMIS user signs that defines the HMIS standards of conduct.
Youth (Homeless Youth)		Homeless Youth are youth who lack a fixed, regular or adequate nighttime residence. Depending on the program and funding source, the age and definition of youth homelessness varies. Some youth programs serve persons up to 18 years of age, while other definitions consider youth up to the age of 21 or 24. Additionally, the US Department of Education considers youth that are sharing housing due to loss of housing or economic hardship to be homeless for purposes of their programs.

## I. POLICIES AND PROCEDURES SUMMARY:

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### A. Policy Disclaimers and Updates

Operating policies and procedures defined in this document represent the minimum standards of participation on the Meck HMIS project and represent general “best practice” operational procedures.

Operational standards in this document are not intended to supersede grant specific requirements and operating procedures as required by funding entities.

The Meck HMIS Operating Policies and Procedures are updated routinely as HUD publishes additional guidance or as part of an annual review. Draft updates will be reviewed at the Meck HMIS Governance Committee monthly meeting and included in the meeting minutes’ distribution email. Before being finalized, the Meck HMIS Policies and Procedures will be formally approved by the Meck HMIS Governance Committee. To allow for evolution of compliance standards without re-issuing core agreements, updated policies supersede related policies in any previously published Policies and Procedures document or agreements. Any changes from the previous year will be highlighted. A current copy of the Meck HMIS Policies and Procedures may also be found on the Mecklenburg County HMIS website ([mecklenburghousingdata.org](http://mecklenburghousingdata.org))

## II. AGREEMENTS, CERTIFICATIONS, LICENSES AND DISCLAIMERS:

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Agencies and users are required to uphold specific rules and responsibilities as participants in the Meck HMIS project.

### A. Required Agency Agreements, Certifications and Policies

Participating CHOs or other partners on the Meck HMIS system must have the following contracts, agreements, policies and procedures available for review:

1. All agencies must have the following fully executed documents on file and be in compliance with the policies and directives contained therein:
  - a. A **Data Use Agreement/Administrative QSOBAA** governing administrative access to the system.

- b. A **Participation Agreement** governing the basic operating principles of the system and rules of membership.
- c. **Sharing QSOBAAs** (if applicable) governing the nature of the sharing and the re-release of data.
- d. A board certified **Confidentiality Policy** governing the privacy and security standards for the Agency.
- e. A board certified **Grievance Policy** outlining a structured process for resolving complaints or grievances against, or within, the organization.

## B. HMIS User Requirements:

All agencies must have the following documents on file for all active users licensed in the Meck HMIS project.

1. A fully executed **User Agreement and Code of Ethics** document governing the individual's participation in the system.
2. All agencies must keep training certificates for active users on file.
  - a. All users must take full privacy training when they are first licensed and take the privacy update training at least annually. Successful completion of the certification questionnaire is required for both the full privacy training and the privacy update. Documentation of completion of these trainings must be kept by the HMIS Lead.
  - b. All users must complete workflow training, related workflow updates and have documentation of the training completion for all programs with which they work.
  - c. All users must be trained in the HUD Data Standards Universal Data Elements and any Program Specific Elements that apply to the programs they work with. This includes training on the processes for collecting client identifying information, the homeless definition and the chronic homeless definition.

## III. PRIVACY:

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### A. Privacy Statement

Meck HMIS is committed to making the project safe for participating agencies and the clients whose information is recorded on the system.

#### Toward that end:

- Sharing is a planned activity guided by sharing agreements between agencies (Sharing QSOBAAs).
- All organizations will screen for safety issues related to the use of automation.
- The Meck HMIS is compliant with HIPAA, and all Federal and State laws and codes. All privacy procedures are designed to ensure that the broadest range of organizations may participate in the project. Access to Personal Protected Information will be restricted to persons with a business need to know, as defined by the laws governing the implementation, (ex. HIPAA, 42

CFR Part 2), these Policies and Procedures and the privacy policies implemented by the CoC and local agencies.

- Meck HMIS has adopted a Privacy Notice that was developed in close collaboration with organizations that manage information that may put a client at risk.
- Privacy Training is a requirement for all agencies and users on Meck HMIS.
- Privacy training is an opportunity for all participating organizations to revisit and improve their overall privacy practices.
- All users issued access to the system must sign a User Agreement & Code of Ethics form, and agencies must sign a Meck HMIS Participation Agreement. Taken together, these documents obligate participants to core privacy procedures. If agencies decide to share information, they must sign an agreement that defines their sharing and prevents release of information to unauthorized third parties (the Sharing QSOBAA).
- Policies have been developed that protect not only a client's privacy, but also an agency's privacy. Privacy practice principles around the use and publication of agency or CoC specific data have been developed and are included in both the Participation Agreement and this HMIS Policies and Procedures document.
- Meck HMIS has incorporated continuous quality improvement training designed to help agency administrators use the information collected in the HMIS to stabilize and improve project processes, measure outcomes, report to funders, and be more competitive in funding requests.

## **B. Privacy and Security Plan:**

All records entered into and downloaded from the HMIS are required to be kept in a confidential and secure manner.

### **Oversight:**

1. All Agency Administrators with support of agency leadership must:
    - a. Ensure that all staff using the system complete annual privacy update training. Training must be provided by Meck HMIS Certified Trainers and based on the Meck HMIS Privacy/Security Training curricula.
    - b. Ensure user accounts are removed from the HMIS when a staff member leaves the organization, or when changes to a staff member's job responsibilities eliminate their need to access the system within 24 hours.
    - c. Report any security or privacy incidents immediately to the HMIS Lead (hmis@mecknc.gov). The System Administrator must investigate the incident within one business day of acknowledgement of the breach, by running applicable audit reports, and by contacting Bitfocus staff for assistance with the investigation. If the System Administrator determines that a breach has occurred, and/or the staff involved violated privacy security guidelines, the client record(s) in question must be immediately
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locked down and the System Administrator will submit a written report to the Meck HMIS Governance Committee Chair and CoC Chair within two business days. A preliminary Corrective Action Plan will be developed and within five business days by the System Administrator. Components of the plan must include at minimum supervision and retraining. It may also include removal of HMIS license, client notification if a breach has occurred, and any appropriate legal action.

2. The HMIS Lead Agency will conduct routine audits of participating agencies to ensure compliance with the Operating Policies and Procedures. The audit will include a mix of system and on-site reviews. The HMIS Lead Agency will document the inspection and any recommendations made, as well as schedule follow-up activities to identify any changes made to document compliance with the Operating Policies and Procedures.

### **Privacy:**

1. Any agency that is subject to the Violence Against Women Act restrictions on entering data into an HMIS are not permitted to participate in the Meck HMIS project. These providers will maintain a comparable database to respond to grant contracts and reporting requirements.
2. All agencies must have the **HUD Public Notice** posted and visible to clients in locations where information is collected.
3. All Agencies must have the Meck HMIS **Privacy Notice**. All Privacy Notices must define the uses and disclosures of data collected on HMIS including:
  - a. The purpose for collection of client information.
  - b. A brief description of policies and procedures governing privacy including protections for vulnerable populations.
  - c. Data collection, use and purpose limitations. The uses of data must include de-identified data.
  - d. The client right to copy/inspect/correct their record. Agencies may establish reasonable norms for the time and cost related to producing any copy from the record. The agency may say “no” to a request to correct information, but the agency must inform the client of its reasons in writing within 60 days of the request.<sup>3</sup>
  - e. Notice to the consumer that the Privacy Notice may be updated over time and applies to all client information held by the Agency.
4. All Notices must be posted on the Agency’s website.
5. All Agencies are required to have a **Privacy Policy**. Agencies may elect to use the Sample Privacy Policy provided by the Meck HMIS project. All Privacy Policies must include:
  - a. Procedures defined in the Agency’s Privacy Notice.
  - b. Protections afforded those with increased privacy risks such as protections for victims of domestic violence, dating violence, sexual assault, and stalking. Protections include at minimum:
    - i. Closing of the profile search screen so that only the serving agency may see the record.
    - ii. The right to refuse sharing if the agency has established an external sharing plan.
    - iii. The right to be entered as an unnamed record, where identifying information is not recorded in the system and the record is located through a randomly generated number (Note: This interface does allow for unduplication by looking at key demographic identifiers in the system.)

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<sup>3</sup> Language was added to clarify the HIPAA rule.

- iv. The right to have a record marked as inactive.
  - v. The right to remove their client record from the system.
- c. Security of hard copy files: Agencies may create a paper record by printing the assessment screens located within Meck HMIS. These records must be kept in accordance with the procedures that govern all hard copy information (see below).
- d. Client Information storage and disposal: Users may not store information from the system on personal portable storage devices. The Agency will retain the client record for a period of seven years (or until no longer needed), after which time the forms will be properly destroyed as described in your agency's privacy and confidentiality policies.
- e. Remote Access and Usage: The Agency must establish a policy that governs use of the system when access is approved from remote locations. The policy must address:
- i. The strict control of the use of portable storage devices with client identifying information.
  - ii. The environments where use is approved. These environments cannot be open to public access and all paper and/or electronic records that include client identified information must be secured in locked spaces or be password controlled.
  - iii. Access via a cellular network using 5G LTE or similar access is permitted if the connection is protected and encrypted. This permits users to access Meck HMIS from cell phones, tablet devices or personal hotspots. If broadcasting a hotspot signal, the device must have a passcode or other security measures to restrict general access.
  - iv. All devices accessing the system are owned by the agency.
6. Agencies must protect **hard copy data** that includes client identifying information from unauthorized viewing or access.
- a. Client files must be locked in a drawer/file cabinet.
  - b. Offices that contain client files must be locked when not occupied.
  - c. Client files must not be left visible to unauthorized individuals.
7. The agency must provide a **Privacy Script** to all staff charged with explaining privacy rights to clients in order to standardize the privacy presentation. The script must:
- a. Be developed with agency leadership to reflect the agency's sharing agreements and the level of risk associated with the type of data the agency collects and shares.
  - b. The script should be appropriate to the general education/literacy level of the agency's clients.
  - c. A copy of the script should be available to clients as they complete the intake interview.
  - d. All agency staff responsible for client interaction must be trained in use of the Privacy Script.
8. Agencies that plan to share information through the system must sign a **Sharing QSOBAA**.
- a. The Sharing QSOBAA prescribes the release of information shared under the terms of the agreement.
  - b. The Sharing QSOBAA specifies what is shared with whom.
  - c. The signatories on the Sharing QSOBAA must be representatives who have been authorized to sign such an agreement by the senior agency's leadership and/or the Agency Board of Directors.
  - d. All members of a Sharing QSOBAA must be informed that by sharing, they are creating a common electronic record that can impact data reflected in their reports.
    - i. When agencies are added to the Sharing QSOBAA, all agencies will receive an updated copy

9. Agencies must adopt and abide by the Meck HMIS **Release of Information (ROI)**.
10. An **ROI** is required to enable sharing of any client's information between any agencies on the system.
  - a. Programs requiring restricted visibility in the system will be only viewable by dedicated agency staff who work in that program. This is accomplished by assigning the program to a Department. Only staff assigned to Departments in Bitfocus will be able to view the program.
  - b. Meck HMIS uses an open sharing system. Users are able to view a client's profile, their history in the system, all programs the client has been enrolled in, when they utilized that program, who their assigned staff person is for each program, and non-confidential notes.
    - (i) Users can view all notes entered for a program of their same agency.
  - c. Client information entered in HMIS may be used to create **By-Name Lists** and in **Prioritization Meetings** provided that:
    - i. The client provides written consent to participate in a By-Name List and/or Prioritization process. Consent for participating in this process is built into the current version of the ROI.
    - ii. Information that a client authorizes to be discussed within the Prioritization/By-Name List process may only be discussed directly at those meetings, and not re-released back to agencies, unless a separate release/Sharing QSOBAA exists releasing that information.
11. The Agency must have a procedure to provide privacy notices to clients that are visually or hearing impaired or do not speak English as a primary language. For example:
  - a. Provisions for Braille or audio
  - b. Available in multiple languages
  - c. Available in large print

**Agencies are encouraged to maintain a culture that supports privacy.**

- d. Staff must not discuss client information in the presence of others without a need to know.
- e. Staff must eliminate unique client identifiers (Name, Social Security Number, Date of Birth) before releasing data to the public.
- f. Staff must eliminate/redact client personal identifiers (full name, Social Security Number, Date of Birth) when sending any electronic communication, unless encrypted for external communications.
  - i. Preferred method of identifying clients is using Unique Identifier/HMIS I.D. Number
- g. The Agency must configure workspaces for intake that supports the privacy of client interaction and data entry.
- h. Individual user accounts and passwords must not be shared between users, or visible for others to see.
- i. Project staff must be educated to not save reports with client identifying data on portable media. Agencies must be able to provide evidence of users receiving training on this procedure through written training procedures or meeting minutes.
- j. Staff must be trained regarding use of email communication, texting, file sharing and other electronic means of transferring data related to client services.

- k. By-name housing prioritization lists may not be printed with client identifying information without written client consent.

**Data Security:**

1. All licensed HMIS Users must be assigned **Access Levels** that are consistent with their job responsibilities and their business “need to know”.
2. All computers must have **network threat protection software with automatic updates**.
  - a. Agency Administrators or designated staff are responsible for monitoring all computers that connect to the HMIS to ensure that:
    - i. The threat protection software is up-to-date.
    - ii. That various system updates are automatic, unless a specific, documented reason exists to maintain an older version of the software.
    - iii. Operating System updates are run regularly.
3. All computers must be protected by a firewall.
  - a. Agency Administrators or designated staff are responsible for monitoring all computers that connect to the HMIS to ensure that:
    - i. For single electronic devices, the software and versions are current.
    - ii. For networked electronic devices, the firewall firmware is current.
4. Physical access to computers and phones that connect to the HMIS must be controlled.
  - a. Users are responsible for ensuring workstations are in private locations, where client information is not visible to others.
  - b. Workstations must be logged off when not manned.
  - c. All workstations must be password protected.
  - d. **All HMIS Users are prohibited from using a computer that is available to the public.**
5. A **Plan for Remote Access** must exist if staff will be using the Meck HMIS outside of the office such as working from home. Concerns addressed in this plan should include the privacy surrounding off-site access.
  - a. The computer and environment of entry must meet all the standards defined above.
  - b. Staff must use an agency-owned/approved computer or phone to access HMIS.

**AI Usage Policy:**

The use of artificial intelligence (AI) tools to generate or assist with case notes is not permitted at any time.

**Remember that your information security is never better than the trustworthiness of the staff you license to use the system. The data at risk is your own, that of your sharing partners and clients. If an accidental or purposeful breach occurs, you are required to notify the System Administrator at [hmis@mecknc.gov](mailto:hmis@mecknc.gov) immediately. A system audit of which users have touched a client record can be completed by a System Administrator.**

## **IV. DATA BACKUP AND DISASTER RECOVERY PLAN:**

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The HMIS is a critically important tool in responding to catastrophic events. The Meck HMIS data is housed in a secure server bank at Flexential in Las Vegas, Nevada. In case of a significant system failure at the main data center, Meck HMIS can be brought back online within approximately 3-5 days.

### **Meck HMIS Project Disaster Recovery Plan:**

In the event of a major system failure:

- a) The Meck HMIS Lead will notify all participating agencies should a disaster occur at Bitfocus which affects the functionality and availability of the HMIS. When appropriate, the HMIS Lead will notify participating agencies and CoC Leadership of the planned recovery activities and related time lines.
- b) The Meck HMIS Lead will notify Bitfocus if additional database services are required.

### **B. HMIS Lead Agency:**

The HMIS Lead Agency has an obligation to secure and backup key information necessary for the administration and functioning of the Meck HMIS Project.

In the event of a local disaster:

- a. Meck HMIS in collaboration with the local Lead Agencies will also provide information to local responders as required by law and within best practice guidelines.
- b. Meck HMIS in collaboration with the local Lead Agencies will also provide access to organizations charged with crisis response within the privacy guidelines of the system and as allowed by law.

## **V. SYSTEM ADMINISTRATOR:**

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The position of the System Administrator is key to the success of the CoC. This team is responsible for overseeing the operation of the Meck HMIS project in Mecklenburg County. This team will be referred to in this section as a System Administrator. The following describes the typical list of responsibilities for a System Administrator within a CoC.

### **A. Training Requirements for a Local System Administrator:**

1. All trainings required for standard users on the system.
  2. Bitfocus Training and Workflow Training for all workflows used in their CoC.
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3. Reports Training (System Administrators are tasked with supporting data quality as well as monitoring outcomes and other performance issues).
4. System Administrator Training – This training usually takes place several weeks after a new System Administrator has been in their position.
5. Continuous Quality Improvement Training
6. All System Administrators are required to read and understand the HUD Data Standards that underpin the rules of the HMIS.
7. HUD Initiative Training (AHAR, PIT, APR, etc.)

## **B. Meetings Local System Administrators Are Required to Participate In:**

1. Regular CoC Meetings and/or workgroups as determined by the CoC.
2. The CoC Reports Committee or meetings where data use and release is discussed.
3. The Monthly System Administrator Call-In (3rd Wednesday of every Month at 1 pm).
4. Regular Agency Administrator/User Meetings within the CoC

## **C. System Administrator Responsibilities:**

### **1. Help Desk and Technical Support**

- a. The System Administrator provides front-line technical support/technical assistance for users and agencies within the CoC they support. This support includes resetting passwords and troubleshooting/problem solving for users and agencies within their CoC. Where applicable, the Local System Administrator may train Agency Administrators to do fundamental system support activities, minimizing the burden for support on the System Administrator.
- b. The System Administrator builds relationships within the agencies they serve, working to understand the business practices of these agencies, and assisting them with mapping these business practices onto the system

### **2. User and Provider Page Setup**

- a. System Administrators will set up new users in Meck HMIS.
- b. System Administrators will supervise license allocation for users and agencies within the CoC they serve. When necessary or requested, the System Administrator will purchase additional licenses directly for the CoC.
- c. The System Administrator will work in partnership with agencies and Agency Administrators in the CoC they serve to ensure that agency provider pages are set up correctly per the HUD Data Standards.

### **3. Communication**

- a. The System Administrator will host regular User/Agency Administrator meetings for system users. These meetings will cover important news on system changes, items of interest within the CoC, and issues identified by the CoC's System Administrator.
- b. The System Administrator will share any key news items of impact, interest, or relevance to the users and Agency Administrators.

#### **4. Training**

- a. The System Administrator will inform Agency Administrators and local users of required and recommended system trainings that are available.
- b. The System Administrator will provide localized training to CoC users and agencies for issues or items of importance related to the local community. These may include local PIT/HIC training, guidance on data cleanup, or specific guidance on proper workflow and system usage that are identified through an audit process.

#### **5. HUD Projects and Activities (Including LSA, PIT/HIC, HMIS APR, SPMs, HUD NOFA):**

- a. The System Administrator will work directly with CoC leadership to complete CoC wide HUD reporting activities such as the AHAR, PIT/HIC, System Performance Measures and the CoC HUD NOFA submission. The System Administrator will also assist the CoC with work surrounding state and local funding initiatives which require data from the HMIS.
- b. The System Administrator will assist with completing the HMIS Annual Performance Report (APR) for NC-505.
- c. The System Administrator will provide support/technical assistance for agencies completing the CoC APR. This includes providing technical assistance with problem solving data quality issues, reporting issues, etc.

#### **6. Local CoC Reporting**

- a. The System Administrator is responsible for providing reports to the CoC. These include, but are not limited to:
  - i. CoC wide demographics, performance outcomes, and data quality reports that are used for informational and evaluation purposes.
  - ii. Final reports on submissions made to HUD for various HUD mandated activities such as the LSA, PIT/HIC, SPMs and the HMIS APR.
  - iii. General requests for data of interest to the local CoC.
  - iv. Any additional reporting requirements initiated by HUD that are required of the local CoC.
- b. The System Administrator will train Agency Administrators and users on how to run reports at the agency level to monitor data quality and outcomes on a regular basis.
- c. The System Administrator will be responsible for generating reports on activities and expenditures to NC-505 as directed by the CoC.

#### **7. CoC/Agency/Project Auditing and Monitoring**

- a. The System Administrator will work with the local CoC to establish local HMIS policies and procedures using this Policies and Procedures document as a frame. The Local System Administrator will work with local CoC leadership and Agency Leadership/Administrators to update this document as needed.
- b. The Local System Administrator, collaborating with the Agency Administrators in the CoC which they serve, will audit agencies and projects to ensure compliance. Audit activities may include, but are not limited to:

- i. Ensuring the agency has all required contracts, agreements and policies in place for participation on the HMIS.
- ii. Verifying system users have completed all required training for system participation.
- iii. Ensuring provider pages are correctly setup per HUD Standards Guidance.
- iv. Ensuring agencies are following appropriate data entry protocol per the funding sources from which they receive funding.
- v. Monitoring implementation of privacy, to ensure client rights are being protected.
- vi. Regularly monitoring data quality, completeness and outcomes to ensure projects are maintaining a high level of compliance with HUD and CoC requirements.

## **VI. AGENCY ADMINISTRATOR:**

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All agencies participating on the system must identify at least one staff member within the organization to serve as an Agency Administrator.

### **A. The Agency Administrator Role/Requirements:**

1. Serves as the lead point of contact in the agency for all HMIS related activities and communication.
2. Is the first point of contact for providing technical assistance for agency users. If the Agency Administrator cannot resolve the issue it will be elevated to the System Administrator.
3. Oversees data quality activities for projects within the agency, (this includes running regular data quality reports and working with staff on data corrections.)
  - a. Is responsible for following the data quality plan defined by the local CoC.
4. Monitors agency compliance with HMIS requirements such as:
  - a. Keeps all agency related HMIS agreements and paperwork on file
  - b. Manages agency user licenses and accounts if delegated the task by the CoC's System Administrator.
  - c. Ensures privacy practices are properly implemented at the agency and project levels.
  - d. Regularly reviews that agency staff are properly trained in their use of the HMIS.
  - e. Audits agency provider pages regularly, in partnership with the System Administrator, to ensure that setup is correct and compliant.
5. Works with agency staff and leadership to complete any funder required reports and/or submissions.
  - a. Works with the System Administrator to check agency data for CoC reporting activities. These include but are not limited to the Point in Time Count/Housing Inventory Count, the Longitudinal System Analysis and System Performance Measures.
6. Training Requirements - Agency Administrators must complete and maintain documentation of the following:
  - a. All base trainings required for HMIS users.
  - b. Reports Training (agency users and leadership are tasked with supporting data quality as well as monitoring outcomes and other performance issues).

7. Agency Administrator Participation Requirements – Agency Administrators should participate in the following CoC or agency meetings:
  - a. CoC HMIS Agency Administrator meetings and trainings.
  - b. Agency specific HMIS user meetings or preside over an HMIS specific topic during routine staff meetings.

## VII. DATA QUALITY PLAN AND WORKFLOWS:

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### A. Program Page Set-Up:

1. Programs are appropriately named per the Meck HMIS naming standards **Agency Name– Project Name – Project Funding Descriptors.**  
For example: The Salvation Army –Emergency Shelter Project – State ESG. Identification of funding stream is critical to completing required reporting to funding organization.
2. Operating Start Dates are appropriately entered on provider pages and reflect when the project began offering housing and/or services. If the project began operating before October 1, 2012 and the exact start date is not known, the start date may be estimated (set to a date prior to October 1, 2012)
3. Inactive Provider Pages must be properly identified with “XXX Closed” followed by the year of the last project exit >Provider Page Name. For example, XXXClosed2016
  - a. All clients in inactive/closed programs must be exited before the program can be closed
4. The primary provider contact information must be current and reflect where the services are being delivered.
5. HUD Data Standards must be fully completed on all provider pages:
  - a. Operating start date is correctly set. If a project is still functioning, the end date is null. If the project has stopped operations, the end date reflects the date the project stopped offering services.
  - b. CoC code must be correctly set. The CoC code for Mecklenburg County is NC-505.
  - c. Project type codes must be correctly set.
  - d. Victim services code is correctly set.
  - e. If a project is an Emergency Shelter, the Method for Tracking Emergency Shelter Utilization field must be correctly set.
  - f. Geocode must be set correctly. The Geocode is 379119.
  - g. The Continuum Project field must be properly completed.
  - h. Grant type must be correctly filled out according to the funding source
  - i. Bed and Unit Inventories must be set for applicable residential projects. Bed and Unit Inventories for all projects should be reviewed at least annually and updated as needed.
  - j. Federal Partner Funding Source values must be selected for projects. Federal Partner Funding Sources are to be updated at least annually. If a project is not funded by a Federal Partner Funding Source, the option selected should be “NA.”

- k. Assessments with the appropriate Living Situation question must be assigned based on Program Type

## **B. Data Quality Plan:**

1. 100% of the clients must be entered into Meck HMIS within 3 days of data collection. If the information is not entered on the same day it is collected, the agency must assure that the date associated with the information is the date on which the data was collected.
  - a. Meck HMIS provides a homeless definition crosswalk and a 3.917 flowchart to support agency level training.
  - b. There must be congruity between the Meck HMIS case record responses, based on the applicable homeless definition. Elements to HUD Data Standard Element 3.917a or 3.917b must be properly completed.
4. The agency has a process to ensure the First and Last Names are spelled properly and that the DOB and Social Security numbers are accurate.
  - a. Identification (ID) may be requested at intake to support proper spelling of the client's name, as well as the recording of the DOB.
  - b. If no ID is available, staff should request the spelling of the person's name. **Staff should not assume they know the spelling of the name.**
  - c. If a client identifies with a different name than the one on legal documents, the name that the give should be entered in HMIS.
    - (i) HMIS records should use a client's full, legal name whenever possible. Doing this as a standard practice makes it easier to find records when searching and avoid creating duplicate records. Generally, projects are not required to verify that the information provided matches legal documents. However, each project should be aware of funders' record keeping requirements, and if maintaining copies of legal documents is a requirement, they should be collected and pertinent information updated in HMIS accordingly.
5. Income, non-cash benefits and health insurance information are being updated at least annually and at exit, or at the frequency specified by program requirements.
  - a. For Permanent Housing Projects, the Housing Move-In Date is completed on the enrollment screen when the client moves into housing.

- b. Annual Assessments will be completed in the 30 days prior to or after the anniversary of the client’s entry into services.
  - c. Projects must have defined processes for collecting this information from as many households as possible.
  - b. There must be a procedure for communicating exit information to the person responsible for data entry if not entering real time.
6. Agency Administrators/staff regularly run data quality reports.
- a. Reports are submitted on a quarterly basis. However, higher volume projects such as shelters and services only projects must review and correct data at least monthly. Lower volume projects such as Transitional and Permanent Housing must run following all intakes and exits and quarterly to monitor the recording of services and other required data elements including annual updates of income and employment.
  - b. The project start and exit dates should be recorded upon project start or exit of all participants. Project start dates should record the first day of service or initial contact with a client. Exit dates should record the last day of residence before the participant leaves the shelter/housing project or the last day a service was provided.
  - c. Data quality screening and correction activities must include the following:
    - i. Missing or inaccurate information in Universal Data Element Fields.
    - ii. The Relationship to Household assessment questions are completed.
    - iii. The Living Situation series of questions are completed.
    - iv. The Client Location question is completed.
    - v. The Domestic Violence questions are completed.
    - vi. HUD Verifications are completed on all Income, Non-Cash Benefits, Health Insurance and Disability sub-assessments.
    - vii. The Housing Move-in-Date is completed for all Permanent Housing projects as appropriate.
    - viii. All project specific data elements are completed as required by the various funding sources supporting the project.
  - d. Providers must audit unexited clients in the system by using the length of stay and unexited client data quality reports.
7. The MeckHMIS Governance committee will review and approve HUD Required CoC Report Data, Review and approve program and/or system performance monitoring data, and make recommendations for System Performance targets for performance improvement.

**C. Workflow Requirements:**

- 1. Program Page Configuration settings must use the templates that are appropriate for the funding stream.
  - 2. Users performing data entry must use the latest copies of the workflow guidance documents.
  - 3. If using paper, the intake data collection forms must align correctly with the workflow.
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4. 100% of clients must be entered into the system no later than 3 days from the intake date.
5. Agencies must actively monitor project participation and client exits. Clients must be exited within 30 days of last contact, unless project guidelines specify otherwise.
6. All required project information must be collected.
  - a. All HMIS participating agencies are required to enter at minimum the Universal Data Elements.
  - b. Projects that serve clients over time are required to complete additional updates as defined by the funding stream.

#### **D. Coordinated Entry Requirements:**

1. All Coordinated Entry projects/provider pages must use an Entry/Exit workflow to track activity within Coordinated Entry
  - a. Clients should be exited using a standardized process for Coordinated Entry Exits. This process is defined by the CoC.
2. All Coordinated Entry projects/provider pages must collect all Coordinated Entry data elements defined in the HUD HMIS Data Standards.

## **VII. RESEARCH AND ELECTRONIC DATA EXCHANGES**

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### **A. Requests for HMIS Data**

1. The CoC may elect to participate in de-identified research data sets to support research and planning.
  1. De-identification will involve the masking or removal of all identifying or potential identifying information such as the name, Unique Client ID, SS#, DOB, address, agency name, and agency location.
  2. In the case of data sets integrated by the Charlotte Regional Data Trust, Name and DOB will be provided for the purpose of creating a unique ID that will be used to integrate HMIS data with other cross sector data sets.
    - a. In this case, the Charlotte Regional Data Trust is viewed as a trusted third party who is provided with the PII for Unique ID creation only. Once the ID is created, all PII is removed from the data set.
  3. Geographic analysis will be restricted to prevent any data pools that are small enough to inadvertently identify a client by other characteristics or combination of characteristics.
  4. Projects used to match and/or remove identifying information will not allow a re-identification process to occur. If retention of identifying information is maintained by a “trusted party” to allow for updates of an otherwise de-identified data set, the organization/person charged with retaining that data set will certify that they meet

- ii. medical/behavioral health security standards and that all identifiers are kept strictly confidential and separate from the de-identified data set.
  - 1. The CoC and MeckMHIS Governance Committee will be provided a description and findings for each study being implemented.
  - 2. The CoC may elect to participate in identified research data sets to support research and planning but may only do so with the explicit written consent of the clients included in the data set.
  - 3. All identified research must be governed through an Institutional Research Board including requirements for client informed consent.
  
- 2. **To Request Data from HMIS:**
  - a) Complete the data request form found on the HMIS tab [here](#)
  
- 3. **Evaluation of Data Request:**
  - a) The HMIS Lead will review all data requests and will work collaboratively with the requestor to refine and revise requests as needed to ensure that the data requested will meet the needs of the requestor and align with the HMIS Data Terms of Use.
    - a. **Evaluation Criteria:**
      - i. Data request aligns with CoC Board Strategic Priorities and/or will be used in efforts to end and/or prevent homelessness.
      - ii. Requestor has clearly outlined plan on how they will ensure systemic racism is not perpetuated in the data presentation.
  
- 4. **Client-level Data:**
  - 1) If the request is for client level data, once it is finalized, it will be presented to the MeckHMIS GC for comment.
    - a) The HMIS Lead will address all MeckHMIS GC comments and concerns with the requestor prior to providing final approval.
  
- 5. **Aggregate Data:**
  - a. Requests for aggregate data will be approved at the discretion of the HMIS Lead.
  - b. All aggregate data request approvals will be shared for informational purposes at the MeckHMIS GC meeting immediately following their approval.
  
- 6. **Data Use Agreements:**
  - a) Once a client level data request is approved by the HMIS Lead, the HMIS Lead will draft a Data Use Agreement between requestor and CoC.
  - b) The Data Use Agreement must be signed by data requestor & CoC Board Chair prior to any release of data.
  - c) The CoC Board will be informed of all data requests at the CoC Board meeting immediately following their approval.
  - d) Failure to comply with the terms of the Data Use Agreement will result in an organizational ban on all future data requests until such time that all impacts of non-compliance have been mitigated and the organization has presented a written plan to the CoC on how it plans to ensure compliance with the terms set forth in the Data Use Agreement.

**Data Release:**

- a. The HMIS Lead determines the order in which requests are filled, based on capacity and CoC priority.

**B. HMIS Terms of Use**

1. A fully executed Data Use Agreement (DUA) will be required for all research and evaluation projects and will be required to comply with all applicable laws and regulations, including the provisions contained in the current Department of Housing and Urban Development HMIS Data and Technical Standards.
  - a. Authorized Use: Once the data request is approved, the entity shall use the data only for the purposes outlined in the request form and executed DUA. The entity must ensure proper access to the data in a manner that is compliant with all applicable federal and state laws;
  - b. Prohibited Use: HMIS data cannot/should not be requested, disclosed or released under these circumstances: (1) the information may cause harm to an individual within HMIS; (2) where the sole intent of the data is to harm a single organization; and (3) it does not comply with any of the approved purposes listed above;
  - c. Termination of Access and Destruction of Data: Upon termination of the DUA or the project the entity shall cease using and destroy any physical and electronic copies of the data that it or they have created within (30) business days of such termination or expiration. Such destruction of the physical and electronic copies shall be in a manner that ensures that the data is rendered unintelligible and unrecoverable to the extent feasible. Compliance with this section shall be certified in writing by the applicable entity, if requested by the HMIS Lead;
  - d. Unauthorized Access: If an Entity has knowledge of any unauthorized access and/or use of share Data, it shall: (a) notify the HMIS Lead immediately (which in no event shall be longer than twelve (12) hours from the time the Entity becomes aware of the unauthorized access and use); (b) take prompt and appropriate action to prevent further unauthorized access or use; (c) cooperate with the HMIS Lead and any government authorities with respect to the investigation and mitigation of any such unauthorized access and use; and (d) take such other actions as HMIS Lead may reasonably direct to remedy such unauthorized access and use, including, if required under any federal or state law, providing notification to the affected Clients.

### C. Electronic Data Exchanges:

1. Agencies electing to either import data to or export data from the Meck HMIS must assure:
  - a. **Data Import** - The quality of the data being loaded onto the System meets all the data quality standards listed in this policy including timeliness, completeness, and accuracy. In all cases, the importing organization must be able to successfully generate all required reports including but not limited to the CoC APR, the ESG CAPER, or other required reports as specified by the funder.
  - b. **Data Export** - Agencies exporting data from Meck HMIS must certify the privacy and security rights promised participants on the HMIS are met on the destination system. If the destination system operates under less restrictive rules, the client must be fully informed and approve the transfer during the intake process. The agency must have the ability to restrict transfers to those clients that approve the exchange.
    - i. Agencies who conduct data exports must have a process to ensure confidential information is secured and protected throughout the entire transmission process.

## APPENDIX A: DOCUMENT CHECKLIST FOR MECK HMIS AGENCIES

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All agencies that participate on the Meck HMIS project are required to keep either a physical or electronic binder containing each of the following fully executed documents.

### Contracts, Agreements, Policies and Procedures

- HMIS Policies and Procedures Document for the CoC:** (Only the HMIS Lead Agency is required to maintain this document. It must have been formally approved by the CoC as evidenced by CoC meeting minutes.)
- Administrative QSOBAA:** Fully signed and executed.
- Participation Agreement:** Fully signed and executed.
- Sharing QSOBAAs:** (Only necessary if the agency has engaged in external sharing). Document should be fully signed and executed. If any changes have been made to a Sharing QSOBAA written documentation and approval of those changes by all parties must be included also.
- Confidentiality Policy:** (As approved by Agency's Board of Directors)
- Grievance Policy:** (As approved by Agency's Board of Directors)

### Meck HMIS User Documentation

- \*User Agreement and Code of Ethics Document:** Fully initialed and signed. A User Agreement and Code of Ethics document must be on file for all users currently licensed on Meck HMIS. It is recommended that the User Agreement and Code of Ethics documents for employees no longer at the agency be kept with their separated employee file.
- User Training Documentation/Certification:** Documentation of all Meck HMIS trainings completed by active users are to be kept in the Meck HMIS binder. These trainings must be certified by the HMIS Lead. Evidence of training include training completion certificates, successfully passed training quizzes, training logs, etc.

**\*Not required to be kept in binder. Copies are stored in user's HMIS Profile.**

### Agency Privacy Documents

- HUD Posted Public Notice:** HUD Public Notices should be posted in locations where clients are seen.
- Privacy Notice:** The Meck HMIS Privacy noticed must be provided by the HMIS Lead to all agencies.
- Current Privacy Script:** Developed and approved by HMIS Lead. The policy should be based on a current version of the Meck HMIS Release of Information.
- Current Meck HMIS Release of Information:** Must specify all sharing partners and the sharing outreach plan, as applicable.