

OR-504 Data Quality Management Plan

About the Data Quality Management Plan

The HMIS Users Workgroup is responsible for reviewing and advising on the content of the HMIS Data Quality Plan and serves as the primary venue to identify barriers to implementation of the CoC Data Quality Plan and ensure agencies and individual users have what they need to be timely, complete, and accurate in their use of HMIS, and to review and make recommendations on HMIS policies and protocols to the HMIS Lead, HMIS Coordination Entity, HMIS System Administrator, and CoC Board.

Participating Agencies are required to designate an HMIS Agency Administrator who is trained on the how to run and review program level reports (including data quality). The Agency Administrator has the highest level of HMIS access at their agency. The Agency Administrator is responsible for ensuring the MWVHA data quality standards are fully met for their agency. The HMIS Coordination Entity, HMIS System Administrator, and Agency Administrators work together to provide accurate data for reporting.

Data Quality

Participating Agencies are required to enter HMIS data in a timely, complete, and accurate manner. This policy outlines the procedures for adherence to the MWVHA HMIS Data Quality standards, including the following elements: Timeliness, Completeness, Accuracy, and Monitoring.

Timeliness:

End Users of any Participating Agency must record individual client and household data within three business days from initial intake, exit, service provision, or any other client interaction which necessitates any form of data entry into HMIS. The Program Entry Date must be the date of the initial intake and not the HMIS data entry date.

Completeness:

A current HUD standard of completeness rate, typically 95%, for all MWVHA HMIS participating organizations and HUD funded homeless projects is established and expected. To ensure that MWVHA HMIS can accurately describe the clients and services provided to clients who are accessing services, a complete and accurate client record is critical for program level reporting, for the use of data in any community level reporting, as well as for HUD required processes such as NOFA and LSA.

“Client doesn’t know/Client refused” are counted in the Completeness Rate. Therefore, “Client doesn’t know/Client refused” must not exceed 10% for any value (e.g., date of birth) in any project.

Accuracy:

HMIS agency administrators are responsible for monitoring the data entry accuracy at their agency level.

HMIS System Administrator is responsible for monitoring accuracy across the CoC and coordinating technical assistance, recommendations, and training to resolve issues.

Monitoring:

The HMIS System Administrator is responsible for producing quarterly CoC-wide reports that measures data quality for the previous quarter. This report focuses on the past month's total active clients, as well as the data quality for those clients.

Agency Administrators are expected to review and make corrections to the data as needed. Final quarterly data quality reports are shared with the HMIS Users Workgroup for review.

Data Use and Disclosure

All end users will follow the HUD HMIS Technical Standards to guide the use of client information stored in HMIS.

Client data (Personally Identifiable Information, PII) may be used or disclosed, but only for system administration, technical support, program compliance, analytical use, and other purposes as required by law.

- Uses involve sharing parts of client information with persons within any Participating Agency.
- Disclosures involve sharing parts of client information with persons or organizations outside the Participating Agencies. However, the entity that receives PII data may only display data in aggregate.

Participating Agencies may use data contained in the system to support the delivery of services to homeless clients across the MWVHA region. Agencies may use or disclose client information internally 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 program.

The vendor (WellSky) and any authorized subcontractor shall not use or disclose data stored in HMIS without expressed written permission to enforce information security protocols. If granted permission, the data will only be used in the context of interpreting data for system troubleshooting purposes.

Release of Information

Participating Agencies must obtain written informed consent, signed prior to sharing any client personal identifiable information with participating agencies. Services will not be denied if a client chooses not to provide written consent to share personal identifiable information. As such, personal identifiable information collected about the client will be protected.

Client must sign the MWVHA Release of Information form (Appendix C) authorizing agencies to share personal information with Participating Agencies within the continuum. This form provides the client an opportunity to decline the sharing of personal identifiable information.

All HMIS stakeholders will follow the HUD HMIS Technical Standards to guide the data release of client information stored in HMIS.

- Data release refers to the dissemination of aggregate or anonymous client-level data for the purposes of system administration, technical support, program compliance, and analytical use.
- No identifiable client data will be released to any person, agency, or organization for any purpose without written permission from the client.
- Aggregate data may be released by the CoC without agency permission.

Data Collection Requirements

Participating Agencies will collect and verify the minimum set of data elements for all clients served by their programs within the timeframe outlined in the HMIS Data Quality Plan section of this manual.

Universal Data Elements

During client intake, end users must collect all the universal data elements set forth in the 2022 HMIS Data Standards Manual. The universal data elements include:

Universal Identifier Elements <i>(One and Only One per Client Record)</i>	Universal Project Stay Elements <i>(1 or More Value(s) Per Client or Household Project Stay)</i>
<ul style="list-style-type: none"> • Name • Social Security Number • Date of Birth • Race • Ethnicity • Gender • Veteran Status 	<ul style="list-style-type: none"> • Disabling Condition • Project Start Date • Project Exit Date • Destination • Relationship to Head of Household • Client Location • Housing Move-In Date • Prior Living Situation

End Users required by funder (such as ESG, OHCS or CoC), must also collect all the program-specific data elements at program entry and exit set for in the 2022 HMIS Data Standards Manual.

Comprehensive and Standardized Assessment Tool – VI-SPDAT

The CoC’s established Coordinated Entry process must be used to prioritize homeless persons for referral to housing and services within the CoC and its local/regional areas¹. To that end, an evidence-based assessment tool must be used as part of initial client intake into CE. The CoC’s HMIS (ServicePoint) client entry/exit process currently includes electronic versions of the VI-SPDAT.

HMIS Program Entry and Exit Date

End Users of any Participating Agency must record individual client and household data, including the Program Entry Date, into HMIS *within three business days*. The Program Entry Date must be the date of the initial intake and not the HMIS data entry date.

End Users of any Participating Agency must record the Program Exit Date of a client into HMIS no later than three (3) business days after exiting the program or receiving their last service.

For returning clients, End User must record a new Program Entry Date and corresponding Program Exit Date.

Coordinated Entry Requirements

All homeless individuals and families must be entered into the Coordinated Entry project (Marion/Polk Coordinated Entry) with the entry date of their initial intake and must include all HUD required data *within three business days*. All homeless individuals and families are to remain open in the Coordinated Entry project until they are housed, and the housing move-in date is entered into their record. This ensures that they remain on the waiting list for other available assistance.

To ensure actively homeless individuals and families have access to services, individuals and families without HMIS activity for 365 days need to be exited from Coordinated Entry.

Interim Updates

End Users of any Participating Agency must record certain updates (Interim Review in ServicePoint) since the initial intake entry to ensure client history and progress is captured. Updates are required to be made *within three business days* of any of the following changes: disabling conditions, income, non-cash benefits, and health insurance.

All interim updates to client data must capture actual dates of those changes as a *new* data entry, leaving all historical data intact. To make a change, users must enter an end date for the historical data and open a new entry with the new date. Historical data should not be altered, without the approval of the System Administrator.

For Permanent Housing (PH) programs: The housing move-in date must be updated *immediately*, to capture that critical information for HUD reporting. This must be completed even if the client remains in the program.

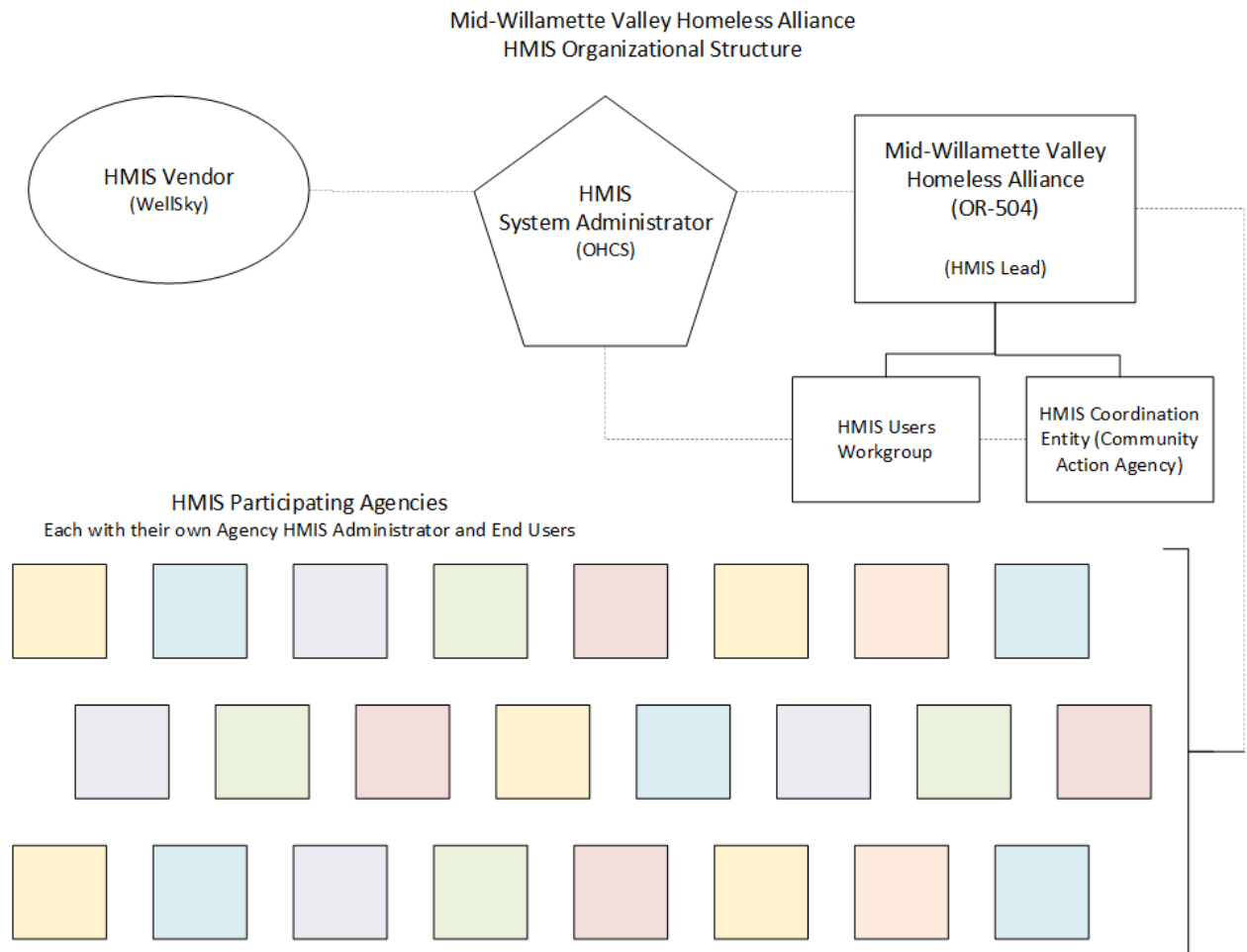
Training Requirements

The HMIS System Administrator (OHCS) will coordinate training for system users. OHCS may contract with the other entities that are qualified to provide the appropriate training. Different levels of training are required for level of access and roles such as System Administrators and End Users. Training will occur on a regular basis. The schedule of trainings will be published on the MWVHA website and in the HMIS Training Site notifications.

The HMIS System Administrator will provide new End Users with a copy of the CoC’s HMIS User Agreement and the CoC’s HMIS Data Quality Management Plan.

Course	Course Detail
New User Training	Users will learn the basic skills and concepts needed to complete the client intake and program entry/exit procedure.
Refresher Training	Active users go through a shortened new user training, review changes to procedures, as well as review any issues users may have with navigating through the system or the data collection process.
Reports Training	Users are given an overview of the various reporting options available.
ROI and Visibility Training	Users learn the purpose and uses of ROIs in the HMIS system. Training includes basic ROI requirements to how to lock data access at the client data level when needed.

Alliance HMIS Organization



Glossary

Agency HMIS Administrator – Each Participating Agency must designate their own HMIS Administrator to serve as the point person for communications between their agency and the Alliance and the System Administrator, and for Agency adherence to the Participation Agreement

End User – end users are the people collecting, entering, and using data in the HMIS. Specific roles and responsibilities include:

- Follow, comply with, and enforce their signed Alliance HMIS Users Agreement.
- Safeguard client privacy through compliance with confidentiality/privacy policies.
- Conduct data collection as specified by training and other documentation.

HMIS Coordination Entity – The Alliance may delegate day-to-day operations to an HMIS Coordination Entity, which provides general education, onboarding orientation, and technical assistance for to Agency Administrators and End Users regarding HMIS operations.

HMIS Lead – The HMIS Lead is the eligible applicant designated by the CoC, in accordance with the [CoC Program Interim Rule](#), to manage the CoC’s HMIS on the CoC's behalf.

HMIS System Administrator: Entity who manages the technical aspects of the day-to-day operations of the HMIS. Works directly with the end users and the HMIS software vendor to ensure authorized access to client information, accessibility of the HMIS software, software performance, correct set-up and monitoring of the system security, and adherence to CoC privacy policies within the software. OHCS is the HMIS system administrator for the Alliance.

MWVHA – Mid-Willamette Valley Homeless Alliance, also known as the “Alliance” or the Continuum of Care (CoC) OR-504

OHCS – Oregon Housing and Community Services

Participating Agency – Any organization (including its employees, volunteers, affiliates, contractors, and associates) which participates in the HMIS by recording, using, or processing Protected Personal Information (PPI) on their clients. Participating Agencies must sign an Alliance HMIS Participation Agreement. Each participating agency is responsible for ensuring they meet the privacy and security requirements detailed in the HUD HMIS Data and Technical Standards.

Protected Personal Information (PPI) – Any information maintained by or for a community organization, or participating agency, about a living homeless client or homeless individual that: 1) identifies, either directly or indirectly, a specific individual; 2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or 3) can be linked with other available information to identify a specific individual.

Release of Information (ROI) – Each client is presented with a form to allow release of personal information to assist in securing services. They may approve or deny via this form.

ⁱ See Sections II.A.4. and II.B.3. of HUD Notice CPD -17-01.