# MO-503
## Continuum of Care - St. Charles, Lincoln and Warren Counties


## TABLE OF CONTENTS
## Contents

**Introduction** .................................................................................................................. 3

**CISS/HMIS Purpose and Philosophy Statement** ................................................................. 4

**Project Overview** ............................................................................................................ 5

The Department of Housing and Urban Development (HUD) and its “HMIS” Requirement ........ 5

Continuum of Care (CoC) ..................................................................................................... 6

Community Council of St. Charles County ......................................................................... 6

Homeless Management Information System (HMIS) ............................................................ 6

CaseWorthy ............................................................................................................................

**Partner Agency** ............................................................................................................... 7

**HMIS User** ....................................................................................................................... 7

**Operating Procedures** .................................................................................................... 7

**Project Participation** ....................................................................................................... 7

Agency Partner Agreement .................................................................................................. 7

Termination of Participation ................................................................................................. 8

CISS/HMIS Privacy and Security Notice .............................................................................. 9

CISS Consumer Notice ....................................................................................................... 9

HMIS Data Standards ........................................................................................................... 10

Protected Service Providers ............................................................................................... 10

Technology Equipment Re-use and Disposal Policy .......................................................... 11

Sheltered Point-in-Time Count ............................................................................................ 11

CISS/HMIS Participation Letters ......................................................................................... 12

Continuum of Care Meetings .............................................................................................. 12

Wellness and Security Reviews .......................................................................................... 12

Quarterly Agency Wellness (Status) Report ....................................................................... 12

Non-Compliance .................................................................................................................. 13

HIPAA .................................................................................................................................. 13

**User Designation and Removal** .................................................................................... 13

Designating a new HMIS User ............................................................................................. 13

Removing HMIS Users ........................................................................................................ 14

User-level Compliancy ......................................................................................................... 14
<table>
<thead>
<tr>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Training</td>
<td>14</td>
</tr>
<tr>
<td>CISS/HMIS New User Training</td>
<td>14</td>
</tr>
<tr>
<td>On-going User Training</td>
<td>14</td>
</tr>
<tr>
<td>Client Information</td>
<td>15</td>
</tr>
<tr>
<td>Notice of Client Rights Form</td>
<td>15</td>
</tr>
<tr>
<td>Client Access to Their Information</td>
<td>15</td>
</tr>
<tr>
<td>Filing a Grievance</td>
<td>15</td>
</tr>
<tr>
<td>Technical Requirements</td>
<td>16</td>
</tr>
<tr>
<td>Minimal Requirements</td>
<td>16</td>
</tr>
<tr>
<td>Workstation Security Procedures</td>
<td>16</td>
</tr>
<tr>
<td>Technical Support</td>
<td>17</td>
</tr>
<tr>
<td>CISS/HMIS Website</td>
<td>17</td>
</tr>
<tr>
<td>Research Policy</td>
<td>17</td>
</tr>
<tr>
<td>FORMS</td>
<td>17</td>
</tr>
<tr>
<td>Agency Partner Agreement</td>
<td>18</td>
</tr>
<tr>
<td>CISS/HMIS Privacy and Security Notice</td>
<td>18</td>
</tr>
<tr>
<td>CISS/HMIS Privacy and Security Summary</td>
<td>18</td>
</tr>
<tr>
<td>CISS/HMIS Consumer Notice</td>
<td>18</td>
</tr>
<tr>
<td>User Policy, Responsibility and Code of Ethics</td>
<td>18</td>
</tr>
<tr>
<td>CISS/HMIS Computer Re-Use and Disposal Policy</td>
<td>18</td>
</tr>
<tr>
<td>Notice of Client Rights Form</td>
<td>18</td>
</tr>
<tr>
<td>Employee Acknowledgement</td>
<td>19</td>
</tr>
<tr>
<td>Client Grievance Policy</td>
<td>19</td>
</tr>
<tr>
<td>New Agency Procedure</td>
<td>19</td>
</tr>
<tr>
<td>Renewal Procedure</td>
<td>19</td>
</tr>
<tr>
<td>Agency User Feedback Form</td>
<td>19</td>
</tr>
<tr>
<td>HIPAA Attestation</td>
<td>19</td>
</tr>
</tbody>
</table>
Introduction

This manual provides the framework for ongoing operations of the MO-503 (St. Charles, Lincoln and Warren Counties) Continuum of Care (CoC) Community Information Sharing System (CISS). The CISS meets the Homeless Management Information Systems (HMIS) requirements set by HUD. It is extremely important in the use of HMIS that client confidentiality, privacy, and security are maintained at the highest level. The policies and procedures written in this document fulfill basic HUD and HMIS requirements.

*Project Overview* provides the main objectives, direction, and vision of MO-503 Community Information Sharing System.

*Operating Procedures* provides specific policies and procedures necessary to ensure compliance in:

- Project Participation
- User Designation
- Training
- Client Information
- Technical Requirements
- Technical Support

*Forms* provide information on obtaining forms as well as sample copies.
CISS Purpose and Philosophy Statement

MO-503 St Charles, Lincoln & Warren Counties
Continuum of Care
Purpose and Philosophy of CISS

The Community Information Sharing System (CISS) is a web-based data sharing system used to track services and outcomes for persons receiving assistance in our community, with a focus on homeless assistance and housing. The CISS solution selected by the St. Charles, Lincoln, and Warren Counties Continuum of Care (MO-503) is provided by CaseWorthy. All organizations providing assistance in our community to persons experiencing homelessness are encouraged to participate in the Continuum of Care CISS. Organizations and agencies receiving federal funding and certain other public funding are required to participate in the Continuum CISS.

Community-wide participation in the local CISS will help the Continuum of Care in coordinated planning to end homelessness. Broad participation by service organizations will allow our community to better track homeless service outcomes and to improve the service network for persons experiencing homelessness. Participation in the CISS will assist in securing and retaining homeless assistance funding.

The Community Council of St. Charles County is the lead agency responsible for implementation of the CISS for the St. Charles, Lincoln, and Warren County Continuum of Care (MO-503). The Continuum of Care, with the support of Community Council staff, guides CISS planning, software selection, and oversight of the database according to the U.S. Department of Housing and Urban Development’s (HUD) Homeless Management Information System (HMIS) standards.

Community Council’s role as the lead agency for the HMIS is to encourage, coach and support local service providers in their participation in our community information system. It is also the Community Council’s task, along with the Continuum Steering Committee, to monitor data input and security procedures. Community Council will provide non-identifying, aggregate quarterly reports from the CISS/HMIS on community progress to end homelessness for our Continuum. Non-identifying, aggregate demographic data on the number and characteristics of persons experiencing homelessness in our community will also be shared with federal, state, and local government officials, as required and appropriate.

Broad participation by service organizations in the CISS/HMIS will assist our Continuum to coordinate services more effectively and to maximize resources; having this data will allow us to identify gaps in services as well as program successes and assist in community planning to end homelessness. CISS/HMIS data will be an essential tool in highlighting programs and services that are the most effective at reducing and ending homelessness.

It is not the intent of the Continuum of Care or Community Council to use data in the CISS/HMIS to deny services to persons needing assistance. Rather, being able to track and to build on the assistance provided by other service providers will allow our community to achieve better outcomes and promote
longer term stability for persons experiencing homelessness. All users of the CISS/HMIS must adhere to strict privacy protections and security protocols detailed in HUD published data, and protect the privacy and confidentiality of the persons with data in our system. (Revised December, 2013)

Project Overview

The Department of Housing and Urban Development (HUD) and its “HMIS” Requirement

In July 2003, the Department of Housing and Urban Development (HUD) published a draft notice of a Homeless Management Information System (HMIS). The notice prompted communities around the nation to set up an HMIS database to capture required Universal Data Elements and established minimum policies and procedures communities were required to put in place.

An HMIS is an electronic data collection system that stores information about the individuals who seek homeless services. It is a valuable resource because of its capacity to integrate and un-duplicate data from all homeless assistance and homelessness prevention programs in a Continuum of Care (CoC). Aggregate HMIS data can be used to understand the size, characteristics, and needs of the homeless population at the local, state, and national levels. It enables organizations that operate homeless assistance and homelessness prevention programs to improve the services they provide by collecting information about clients’ needs.

In March 2010, HUD released the Revised Data and Technical Standards Notice. This Notice added a new set of Program Data Elements – that is, data to be collected about all homeless assistance and homelessness prevention programs in the CoC, by program type. These data elements are needed for reports to be submitted as part of the annual CoC application for funding. In addition, there were revisions to the Data Standards for Universal Data Elements. All CoC programs participating in a community HMIS must enter required Universal Data and Program Data Elements. The Department of Housing and Urban Development (HUD), the Department of Health and Human Services (HHS), and the Department of Veterans Affairs (VA) released the 2014 HMIS Data Dictionary and 2014 HMIS Data Manual on May 1, 2014, updating the 2004 HMIS Data and Technical Notice and the 2010 HMIS Data Standards Notice. The HMIS Data Standards outlined in these two documents provide communities with baseline data collection requirements developed by HUD, HHS, and VA.

The effective date of the 2014 HMIS Data Standards is October 1, 2014. This means that all HMIS solutions must be programmed to collect data based on the 2014 Standards by that date.

The MO-503 Continuum of Care, using a broader vision, has elected to refer to its “HMIS” as a Community Information Sharing System, or CISS. CISS will be used ‘interchangeably’ with HMIS throughout this document.
**Continuum of Care (CoC)**

Historically, a CoC is a long-range planning process that addresses the needs of persons experiencing homelessness, in order to help them reach maximum self-sufficiency. Each CoC is responsible for working with homeless assistance organizations in their geographic area to coordinate the delivery of housing and services to homeless families, individuals, youth, and persons with disabilities. Additionally, the CoCs are responsible for implementing and managing HMIS within their CoC. Missouri is organized into eight geographically-based Continuums of Care (CoC). The eight CoCs in Missouri are:

- **Joplin CoC** – Jasper and Newton counties
- **Kansas City CoC** – Jackson County
- **Springfield Area CoC** – Christian, Greene, and Webster counties
- **St. Charles CoC** – St. Charles, Lincoln and Warren counties
- **St. Louis City CoC** – St. Louis City
- **St. Louis County CoC** – St. Louis County
- **St. Joseph CoC** – Andrews, Buchanan, and Dekalb counties
- **Dekalb counties**

**Community Council of St. Charles County**

The Community Council of St. Charles County is funded by the United States Housing and Urban Development (HUD) office to administer the Homeless Management Information System (HMIS) for the St. Charles, Lincoln and Warren (MO-503) Continuum of Care. Community Council is responsible for the implementation of the HMIS, including ensuring that all privacy, confidentiality and security policy and procedures are followed according to HUD’s HMIS standards.

**Homeless Management Information System (HMIS)**

HMIS is a shared database for the use of organizations that provide assistance to individuals who are homeless or who are at risk of becoming homeless. The main purposes of HMIS are to provide better coordination of services and to measure the extent and nature of homelessness. HMIS is used to streamline the intake and referral process for human service agencies in the community. Service providers can input data into HMIS and share it, to the extent allowed, with each other. The data collected in HMIS presents communities with the opportunity to re-examine how homeless services are provided in their community and to determine the best use of those services, as well as to identify gaps in the local service continuum and develop outcome measurements. HMIS is a secure, private database accessed via the World Wide Web, accessible only by authorized HMIS Users.
CaseWorthy

CaseWorthy is the HMIS Solution used in the St. Charles Continuum of Care (MO-503). Partner organizations in the MO-503 implementation of CaseWorthy will include service providers in St. Charles, Lincoln and Warren Counties.

Partner Agency

A Partner Agency is any organization providing housing, homeless prevention assistance, and/or otherwise serving families and individuals who are experiencing homelessness or who are at risk of becoming homeless, and is enrolled in and actively entering data into the CISS. Each Partner Agency must sign and abide by the Agency Partner Agreement. This agreement is signed and renewed annually.

CISS User

A CISS User is an individual who has been identified by a Partner Agency as a person to have access into the CISS and has completed the required new user and confidentiality trainings. The CISS User will sign a User Policy and Responsibility agreement prior to receiving access to the database. This agreement will be renewed annually.

Operating Procedures

Project Participation

Agency Partner Agreement

Service agencies and organizations may request permission to participate in the CISS and become a Partner Agency. All agencies approved to access the CISS must have a signed Agency Partner Agreement in place and agree to abide by the policies and procedures as outlined in this document. The Agency Partner Agreement is a contract between the Partner Agency and The Community Council of St. Charles County. The Partner Agreement outlines specific requirements on confidentiality, CISS use, data entry, system security, and reporting. Any questions regarding the terms of the Agency Partner Agreement should be submitted to the CISS Program Manager.

Procedure:
The Partner Agency’s Executive Director or other authorized representative must sign the Agency Partner Agreement in duplicate and mail both original forms, along with an annual cost share fee, currently $600.00 to:

The Community Council of St. Charles County
Attention: CISS Program Manager
P.O. Box 219
Cottleville, Mo 63338-0219
This fee will be a maximum of 50% of the current per agency cost to the vendor. The HMIS Lead, at its discretion, may allow a new Participating Agency coming onto the CISS/HMIS a trial period of one year, and waive the first year’s cost share payment. If, in renewal years, a Participating Agency wishes to be considered for a waiver due to capacity and or financial hardship, the agency will be required to provide a letter of appeal to the Steering Committee, describing the hardship. The Steering Committee will approve renewal waivers of the cost share payment on a case-by-case basis.

The Executive Director of Community Council will sign both original agreements and Community Council will send one back to the agency, retaining the second.

**Agency Renewal Procedure**

Participating CISS agencies will have the option to renew their contracts annually, either on February 1 or August 1, based upon the time their original contract is effective. Letters for renewal will be mailed to the Executive Director or Chief Executive Officer on December 1st (for February renewals) and on June 1st (for August renewals). The annual cost share per agency is $600.00. Limited scholarships may be available. New agencies will be pro-rated to the next renewal option date.

**Termination of Participation**

Reasons for voluntary termination of participation include, but are not limited to:

- The Partner Agency is no longer running the program or project for which they were entering data into CISS, or;
- The Partner Agency is no longer being mandated to enter data into CISS by one of their funders.

**Procedure:**

1. The Partner Agency will inform the CISS Program Manager in writing 30 days prior to their intention to terminate their agreement to participate in the CISS. The letter must be written on agency letterhead and signed by the Partner Agency’s Executive Director or authorized representative.

2. The Partner Agency will make sure all data in the CISS database is current and run all reports needed prior to termination. If a need for reports from CISS should arise after termination, the Partner Agency should contact Community Council.

3. It is recommended that all hard copy files of client information will be retained by the Partner Agency for three years after the client’s date of program exit.

4. Community Council will terminate enrollment and revoke access of the Partner Agency’s CISS Users to the database. All Partner Agency specific information contained in the CISS database will remain in the CISS database.
5. No refund of cost share payments shall be made, regardless of whether the Partner Agency elects to terminate prior to the end of the current contract cycle.

6. Data collected for purposes of inclusion in the MO-503 Continuum of Care CISS/HMIS is jointly owned by the contributing CISS organizations and the MO-503 Continuum of Care.

Involuntary termination of an agency may occur if Partner Agreement terms are violated.

**CISS Privacy and Security Notice**

The Full CISS Privacy and Security Notice describes in detail the clients’ rights regarding CISS. The Summary Notice summarizes these rights. This document must be edited by the CISS Partner Agency with the agency’s information.

**Procedure:**

The CISS Privacy and Security Notice is a word document in which the CISS Partner Agency’s specific information will need to be inserted (i.e., name of agency, address, contact information).

1) Insert the CISS Partner Agency Name into the document heading.
2) Insert the CISS Partner Agency’s contact information for which the client may contact to file a complaint.
3) Insert the CISS Partner Agency website information.
4) The Full CISS Privacy and Security Notice is required to be posted to the organization’s website.
   a. If the Partner Agency is also participating in CISS in other Continuums, only 1 Notice is required to be posted, however, if using another CoC Notice, it must be equivalent to the MO-503 Notice.

The Summary CISS Privacy and Security Notice may be edited with the organization’s name and provided to each client. If the Client is provided with the Summary Notice, the Full Notice must be made available to clients upon request.

If an agency serves clients whose first language is not English, the agency must be able to provide a translated version of the CISS Privacy and Security Notice or interpretation services.

**HMIS Consumer Notice**

The CISS/HMIS Consumer Notice notifies the Client that the Partner Agency participates in CISS/HMIS and the reasons for collecting their information. It also makes the Client aware that they may request the Full Privacy Notice at any time.

The CISS/HMIS Consumer Notice must be posted in a manner in which it is visible to all clients. In addition, if an agency serves clients whose first language is not English, the agency must provide a translated version of the CISS/HMIS Consumer Notice or interpretation services.
HMIS Data Standards
The MO-503 follows the HUD requirements whereby all agencies participating in the HMIS are to collect a standard set of client information, known as the Universal Data Elements. Within our CoC, there are additional Program-Specific Data Elements that are also required in order to produce the necessary CoC level aggregate reports.

Agencies are responsible for knowing all the Universal and Program Specific Data Elements. The Department of Housing and Urban Development (HUD), the Department of Health and Human Services (HHS), and the Department of Veterans Affairs (VA) released the 2014 HMIS Data Dictionary and 2014 HMIS Data Manual on May 1, 2014, updating the 2004 HMIS Data and Technical Notice and the 2010 HMIS Data Standards Notice. The HMIS Data Standards outlined in these two documents provide communities with baseline data collection requirements developed by HUD, HHS, and VA.

The effective date of the 2014 HMIS Data Standards is October 1, 2014. This means that all HMIS solutions must be programmed to collect data based on the 2014 Standards by that date. These standards may be accessed by going to www.onecpd.info.

Accurate data collection is important for the coordination of services across multiple agencies, determining eligibility for client services, and generating reports from CISS/HMIS. A sample CISS/HMIS Intake Form is available for your use as a word document to allow program specific revisions.

Procedure:

1. CISS/HMIS Partner Agencies and Users will collect all of the CoC required information for its clients and any additional data as required by each agency.

2. CISS/HMIS Users are required to ensure data quality of the information they collect, as stated in the CISS/HMIS User Policy and Responsibilities form. This is accomplished by reviewing the data the client has provided at the time of intake and correcting any identified data quality issues.

Protected Service Providers
Some Partner Agencies may be designated as “Protected” if they are covered by the Health Insurance Portability and Accountability Act (HIPAA) and/or serve a specific protected population such as:

- Domestic violence
- Sexual violence
- HIV/AIDS
- Alcohol and/or substance abuse
- Mental health

Community Council of St. Charles County
Version 3
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Any Partner Agency shall have access to identifying and statistical data on all clients in the CISS/HMIS database except for data input into the database by Protected Providers. A Partner Agency designated as a Protected Provider can see the data it enters into the CISS/HMIS; however, other Partner Agencies do not have access to protected agencies data.

A designated “protected” Partner Agency shall have access to identifying and statistical data the Agency inputs into the CISS/HMIS database for clients served by that agency.

A designated “protected” Partner Agency shall not have access to identifying and statistical data input into the CISS/HMIS database for clients served by other designated “protected” Partner Agencies.

Domestic Violence shelters are not allowed to enter data into an HMIS; they are however, required to enter data into a comparable database in order to provide aggregate data to the Continuum.

**Technology Equipment Re-use and Disposal Policy**

All computers (as well other electronic equipment that may store data, such as printers, copiers, tablets and fax machines, as applicable) no longer used in conjunction with CISS/HMIS will have their hard drives reformatted multiple times before being used again by the Partner Agency or anyone else.

**Re-assigned Equipment**

All computers (as well other electronic equipment that may store data, such as printers, copiers, tablets and fax machines, as applicable) used to access CISS/HMIS and which will no longer be used to access CISS/HMIS will have their **hard drives reformatted multiple times**.

**Non-functional Equipment**

All computers (as well other electronic equipment that may store data, such as printers, copiers, tablets and fax machines, as applicable) used to access CISS/HMIS and is now non-functional, must have their **hard drives pulled, destroyed, and disposed of in a secure fashion**.

The agency will destroy or reformat the technology equipment used for CISS/HMIS data collection according to the CISS/HMIS Computer Reuse and Disposal Policy.

**Sheltered Point-in-Time Count**

HUD requires every Continuum of Care to complete a Sheltered Point-in-Time count at least bi-annually. The MO-503Continuum of Care has chosen to complete a Point-in-Time Sheltered Homeless Count annually. An additional summer count may be conducted if requested by a governmental agency. Community Council staff collects the required data on homeless individuals currently in Emergency Shelter, Transitional Housing, or being temporarily housed in a hotel or motel by an agency. Agencies enrolled in CISS/HMIS have their data pulled directly from the system and Community Council verifies that data with the primary contact of the Partner Agency.
HMIS Participation Letters
Partner Agencies may request HMIS participation letters from the CISS/HMIS Program Manager. This letter may be submitted with the Partner Agency’s application for funding for various funding sources. HMIS participation letters will be provided for those agencies that are:

- Domestic violence agencies that have provided aggregate level data during the last two Point-in-Time Counts
- Currently enrolled Partner Agencies in compliance
- Currently enrolled Partner Agencies not in compliance
- New Agencies that have started the HMIS enrollment process

Continuum of Care Meetings
Continuum of Care Meetings for MO-503 (St. Charles, Lincoln and Warren Counties) are held on the third Friday of every month, except July and December, in which provider agencies can come together to share ideas, problem solve, and address unmet homeless needs. In order to maintain a connection with the network of Service Providers, Partner Agencies are required to attend a minimum of one meeting each quarter. Some funders, such as the Missouri Housing Development Commission, have additional attendance requirements for their grantees. The success of the CISS/HMIS project in addressing homelessness in our community depends upon continued collaboration and discussion. Dates, times and locations for meetings in the upcoming year are sent to all Partner Agencies in December. Dates, times and locations can be found on the Community Council Website.

Wellness and Security Reviews
Community Council conducts a minimum of one formal assessment per year with each Partner Agency. Each February a “Wellness and Security Review” is conducted which allows the Community Council to identify any areas where the Partner Agency may require additional technical assistance to bring the agency into compliance with all Data and Security Standards. Additionally, we will assess privacy and security compliance. These visits also provide the opportunity for CISS/HMIS Users to provide and receive feedback, and assistance with software issues.

Quarterly Agency Wellness (Status) Report
Following the end of each calendar quarter, the Community Council will formally monitor the data input into the CISS/HMIS by running quarterly reports for each Partner Agency. An Agency Wellness (Status) Report will be completed and sent to the designated Agency Compliance Monitor which will indicate any data quality or security issues discovered and steps the agency will need to take to address these. This is an important tool for the Partner Agency and an opportunity to correct any data entry errors in a timely manner. Partner Agencies are encouraged to develop their own self-monitoring plan in an additional effort to ensure data quality.
Non-Compliance

In the event that there is significant or continued non-compliance by a Partner Agency, the Community Council will make formal notification to the Partner Agency Executive Director and/or Board of Directors.

Procedure:

A CISS/HMIS Non-Compliance Alert letter will go to the designated Partner Agency CISS/HMIS Compliance Monitor.

If the issue is not resolved in a timely manner, a second CISS/HMIS Non-Compliance Alert will be sent to the Executive Director, CEO, or COO (or other designated agency leader) indicating that the Agency is out of compliance and that this could put agency funding in jeopardy.

Finally, if necessary, a CISS/HMIS Non-Compliance Alert will go out to the agency’s Board of Directors.

It is the intention of the Community Council to afford agencies every opportunity to address and correct compliance issues in an effort to ensure data integrity and retain funding for our Continuum.

HIPAA

Partner Agencies who are considered a “covered entity” under the Health Insurance Portability and Accountability Act of 1996, 45 C.F.R., Parts 160 & 164, and corresponding regulations established by the U.S. Department of Health and Human Services is required to operate in accordance with HIPAA regulations. On Jan. 25, 2013, the Department of Health and Human Services (HHS) published the “HIPAA Omnibus Rule,” a set of final regulations modifying the Health Insurance Portability and Accountability Act (HIPAA) Privacy, Security, and Enforcement Rules to implement various provisions of the Health Information Technology for Economic and Clinical Health (HITECH) Act. The new rule took effect on March 26, 2013. However, covered entities had until Sept. 23, 2013, to comply with the Omnibus Rule. More information can be found at: http://www.hhs.gov/ocr/privacy/. HIPAA compliant Partner Agencies will be required to complete the HIPAA Attestation.

User Designation and Removal

Designating a new CISS/HMIS User

Individuals working on behalf of an agency (employee, contractor or volunteer) that will be accessing CISS/HMIS must be designated as a CISS/HMIS User. CISS/HMIS Users are designated by the Partner Agency’s Compliance Monitor or the Executive Director or authorized representative.

Procedure:

The Partner Agency’s Executive Director or authorized representative will obtain the User Policy and Responsibility form, which must be completed and signed by the designated CISS/HMIS User and the Partner Agency’s Compliance Monitor. The original form must be kept on file at the Partner Agency, and
a copy sent to the CISS/HMIS Program Manager in order for the designated User to be registered for CISS/HMIS training. It may be emailed to: hmis@communitycouncilstc.org or faxed to 636-447-7337.

CISS/HMIS Users are allowed to access the CISS/HMIS after signing a User Policy and Responsibility form and completing the required training.

CISS/HMIS Users are responsible for following the policies and procedures outlined in this document, and are responsible for collecting and entering accurate client data.

**Removing CISS/HMIS Users**
The Partner Agency must send written notification to the CISS/HMIS Program Manager within three working days identifying any CISS/HMIS User who will no longer be authorized to have access to the CISS/HMIS.

**User-level Compliance**
Any CISS/HMIS User found to be out of compliance at the user-level will be given 30 days to come into compliance. If after 30 days the CISS/HMIS User is not found to be in compliance, the CISS/HMIS User’s username and password will be suspended until such time the User comes back into compliance.

**Training**

**CISS/HMIS New User Training**
All CISS/HMIS Users will be required to complete the necessary New User training requirements before obtaining access to the CISS/HMIS database. CaseWorthy New User and Confidentiality Training is available through the Community Council of St. Charles.

**On-going User Training**
CaseWorthy or Community Council will provide training on software updates and enhancements as needed.

Community Council will provide training on Continuum policies and procedures regarding data entry as needed. Community Council will provide access to annual training on Ethics, Data Quality and Privacy and Confidentiality.

CaseWorthy or Community Council will provide Report training, Funder Requirement training, and HUD Regulation training as applicable and necessary.
**Client Information**

**Notice of Client Rights Form**
HUD’s Homeless Management Information Data Standards of March 2010, updated in 2010 and 2014, allow for clients to be able to refuse answering some specific data questions. Partner Agencies are required to ensure that clients are aware of their right to refuse.

**Procedure:**

The Client has the right to refuse certain data to be entered into the CISS/HMIS database. The Partner Agency is required to have every client (Head of Household) it serves sign a Notice of Client Rights form. The Head of Household is determined by the individual agency, its policies and target population. This form states the Client will receive services if the Client refuses to provide necessary information for CISS/HMIS, though the Client’s eligibility to receive some specialized services may be inhibited by not participating in CISS/HMIS.

**Client Authorization**
Client Authorization expires 7 years from the date the Notice of Client Rights from is signed. This is in keeping with Missouri Housing Development Commission and Federal (HUD) requirements on how long grant files are to be kept.

**Client Access to Their Information**

**Policy:**
Clients have the right to a copy of their Universal and Program-Specific data contained within the CISS/HMIS.

**Procedure:**
Clients submit a written request for a copy of their information contained within CISS/HMIS to the Partner Agency.

Partner Agencies are **not** required to print out any additional information, although it is optional and allowed.

**Filing a Grievance**

**Policy:**
Clients have the right to file a grievance regarding potential violations of their privacy and rights regarding CISS/HMIS participation. No negative action will be taken against a client for filing a grievance.

**Procedure:**
A client must request and complete the grievance form from the Partner Agency.

Should a Partner Agency receive a completed grievance form, they must inform the Community Council of the grievance and its outcome.
If a client is not happy with the Partner Agency’s handling of an CISS/HMIS grievance, the client has the right to contact the Community Council.

**Technical Requirements**

**Minimal Requirements**
All computers authorized to access CISS/HMIS must meet the following minimum requirements:

1. **Internet Access:** CISS/HMIS Partner Agencies need to have a modem (Internet) connection. While the use of the database can be obtained with a dial-up connection, optimum efficiency of use requires a minimum of a broadband connection.

2. **Firewall protection:** It is required that all computers used to access the CISS/HMIS have up-to-date firewall protection.

3. **Anti-virus protection:** All computers used to access the CISS/HMIS database require up-to-date anti-virus protection software. Anti-virus protection software should be set to update automatically and should be checked periodically to ensure it is current.

4. **Log-On Password Protection:** All computers used to access the CISS/HMIS database require log-on passwords.

5. **Password protected screen-saver:** All computers used to access the CISS/HMIS require an up-to-date password protected screen-saver. The screen-saver should be set to turn on every 2-3 minutes when the computer is not in use.

**Workstation Security Procedures**
Workstation monitors are to be placed in such a manner as to prohibit unauthorized individuals from viewing the data on the screen. When unable to achieve this, the use of a privacy screen on the monitor is allowed.

If it is necessary to write down your CISS/HMIS username and/or passwords, it must be stored in a secure location such as a locked drawer or cabinet. This information should not be placed under a keyboard, monitor, or in any location where non-designated CISS/HMIS users may find it. Do not share your login information with anyone.

When you are away from your computer, log out of the CISS/HMIS and log out of your workstation.
**Technical Support**
Community Council is the best resource for obtaining specific database information and help troubleshooting. Normal business hours are 8:00am-4:00pm Monday through Friday, except holidays.

The Community Council of St. Charles County administers the MO-503 CISS/HMIS. Participating CISS/HMIS users are encouraged to contact the Program Manager for Technical Assistance. If unable to directly resolve the matter, the Program Manager will facilitate assistance from CaseWorthy.

The CISS/HMIS Program Manager can be reached at 636-978-2277. The Program Manager’s email address is: hmis@communitycouncilstc.org.

**CISS/HMIS Website**
Information about CISS/HMIS can be found on the Community Council website under Initiatives: www.communitycouncilstc.org

**Research Policy**
The CISS/HMIS rules protect the confidentiality of “protected personal information,” or PPI. PPI is any information maintained by a homeless service organization that:

- Identifies, directly or indirectly, a specific individual;
- Can be manipulated by a reasonably foreseeable method to identify an individual; or
- Can be linked with other available information to identify an individual.

PPI can be disclosed externally or used internally by the homeless service organization only if the use or disclosure is permitted by law and the use or disclosure is described in the organization’s privacy policy.

One of the permitted uses of PPI is for academic research (HMIS Privacy Standard 4.1.3).

The use of PPI from the MO-503 CISS/HMIS for academic research is only permitted if there is a written research agreement authorized by the MO-503 Continuum of Care, between the Lead Agency (Community Council of St. Charles County) and the researcher. The research agreement must establish rules and limitations for processing and maintaining the security of PPI, provide for its return or disposal at the end of the research, restrict additional use or disclosure, and require the data recipient to agree to abide by the conditions.

**FORMS**
You may obtain all forms referenced in this document on the Community Council website under HMIS: www.communitycouncilstc.org
Agency Partner Agreement
This form is an agreement between a participating agency and the Community Council of St. Charles County (The Lead CISS/HMIS agency and the agency that received the grant from HUD to create the HMIS). The form describes the mutual responsibilities in connection with the use of the CISS/HMIS database. It spells out many of the duties of the Partner Agency as a whole toward maintaining the confidentiality of client information.

CISS/HMIS Privacy and Security Notice
The CISS/HMIS Privacy and Security Notice for your agency describes in detail the clients’ rights regarding CISS/HMIS.

CISS/HMIS Privacy and Security Summary
The CISS/HMIS Privacy and Security Notice Summary for your agency summarizes the clients’ rights regarding CISS/HMIS.

CISS/HMIS Consumer Notice
The CISS/HMIS Consumer Notice notifies the Client that the Partner Agency participates in CISS/HMIS and the reasons for collecting their information. It also makes the Client aware that they may request the Full Privacy Notice at any time.

User Policy, Responsibility and Code of Ethics
Individuals working on behalf of an agency (employee, contractor or volunteer) that will be accessing CISS/HMIS must be designated as an CISS/HMIS User. CISS/HMIS Users are designated by the Partner Agency’s CISS/HMIS Compliance Monitor or Executive Director or authorized representative. The form describes the duties of CISS/HMIS Users in keeping client information confidential and maintaining the security of the CISS/HMIS database.

CISS/HMIS Computer Re-Use and Disposal Policy
The CISS/HMIS Computer Re-Use and Disposal Policy outlines the requirements set by the MO-503 Continuum of Care for the re-use and disposal of any computer used to access the CISS/HMIS.

Notice of Client Rights Form
By signing the Notice of Client Rights Form, the client understands that any information he/she shares with an agency participating in CISS/HMIS is kept confidential and that only those authorized to input data in CISS/HMIS can view their personally identifying information. By signing this form, the client also understands he/she has the right to refuse to answer a question in CISS/HMIS and, furthermore, that if he/she decides at a later date they no longer want their information to be in CISS/HMIS, that he/she can request it be removed.
**Employee Acknowledgement**
The Employee Acknowledgement is required to be signed by each staff member (including employees, volunteers, affiliates, contractors and associates) who may come in contact with data from the CISS/HMIS, either hard copy or otherwise, acknowledging receipt of a copy of the CISS/HMIS privacy policy and pledging to comply with said privacy policy.

**Client Grievance Policy**
An Agency Client Grievance Policy must be in place and the Client Grievance Form may be edited for your agency, for this purpose.

**New Agency Procedure**
The New Agency Procedure details the requirements the step-by-step process for a new agency to come onto the CISS/HMIS.

**Renewal Procedure**
The Renewal Procedure form details the annual Partner Agency renewal process.

**Agency User Feedback Form**
This form is available to CISS/HMIS Users for reporting any problems or issues encountered while entering data/accessing the system to the Community Council for follow-up.

**HIPAA Attestation**
HIPAA compliant Partner Agencies will be required to complete the HIPAA Attestation.