



HMIS Policy & Procedures Manual

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Key Terms & Acronyms

Key Term	Acronym (if used)	Brief Definition
Advanced Reporting Tool	ART / Business Objects	This is accessed through HMIS and also referred to as 'Business Objects' &/or 'SAP' The HMIS Lead assigns ART licenses as necessary
Coordinated Entry / Coordinated Entry System	CE / CES	Prioritizes limited housing resources by connecting people experiencing homelessness with the most appropriate housing program available based on their needs and encourages collaboration between homeless service providers to reduce duplication of efforts. Each LHC in the MD BoS CoC has an LHC specific CE project in HMIS
Community Services		The HMIS that the CoC uses (previously called ServicePoint)
Comparable Database		Used by Partner Agencies that meet the HEARTH Act definition of Victim Service Provider (VSP) &/or have projects that receive specific DV funding. A relational database that meets all HMIS Data Standards and the minimum standards of HMIS privacy and security requirements, including HUD's most recent reporting standards and comma separated value (CSV) format specifications.
Continuum of Care	CoC	A regional or local planning body that coordinates housing and services funding for homeless families and individuals
CoC Lead		Is responsible for applying for CoC Planning funds, Coordinating and submitting the annual application to HUD for CoC program funding, and Coordinating and administering the activities and responsibilities of the CoC as specified in the CoC's Governance Charter. Maryland Department of Housing and Community Development (DHCD) is the entity elected by the CoC for this role
Covered Homeless Organization	CHO	Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes data on homeless clients for an HMIS
Emergency Shelter	ES	Any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless
End User	EU	An individual who is a paid staff member, contract employee, or official volunteer of a Partner Agency, that has access to HMIS
HMIS Helpdesk	Helpdesk	An online system for HMIS End User's and CoC Stakeholders to submit a ticket requesting support from the MD BoS HMIS Lead Team by CLICKING HERE
Housing Inventory Count	HIC	<u>HUD Exchange: PIT and HIC</u>
Homeless Management Information System	HMIS	An internet-based database that is used by Partner Agencies to record and store client- level information to better understand the numbers, characteristics and needs of homeless persons and those at risk of homelessness

HMIS Lead		<p>The HMIS Lead Agency is responsible for the technical design, implementation, and operation of the HMIS. In doing so, the HMIS Lead provides Partner Agencies and users with training and technical support, and ensures compliance with HMIS policies and procedures.</p> <p>Maryland Department of Housing and Community Development (DHCD) is the entity elected by the CoC for this role.</p>
HMIS Participating Project		Projects that are either required by a funder to, or the Partner Agency has opted to, enter client level data into the CoC's HMIS
HMIS System Administrator		<p>Are part of the HMIS Lead Team and manage the day-to-day operations of the MD BoS HMIS, including the HMIS Helpdesk.</p> <p>The Institute for Community Alliances (ICA) is the entity selected by the CoC for this role.</p>
Maryland State HMIS Data Warehouse	MSHDW	<p>The MSHDW is a collaborative effort between the Maryland Department of Housing and Community Development and the sixteen Maryland Continuums of Care (CoC). The software used by MSHDW is Community Services, a web-based HMIS client tracking database created and maintained by WellSky.</p> <p>MSHDW operates a separate Community Services HMIS that is a separate system from the MD BoS HMIS</p>
Non-HMIS Participating Project		Projects that do not enter client level data into the CoC's HMIS but are required to provide aggregate client level data to the CoC for reporting purposes. (Example: VSP's, HUD-VASH, etc.)
Local Homeless Coalition	LHC	A group made up of members from different sectors of a community that come together to plan, deliver, and evaluate homeless services, housing, and supportive services in a defined geographic area
Other Permanent Housing	OPH	HUD Project Type: Long-term housing that is not otherwise considered permanent supportive housing or rapid re-housing
Partner Agency		<p>Agencies that are members of the MD BoS CoC and serve persons experiencing homelessness, or near homelessness (as defined by HUD) in the geographic area of MD-514, and have a current 'Partner Agency Agreement' with the HMIS Lead to use the MD BoS HMIS.</p> <p>Partner Agencies can have '<i>HMIS Participating Projects</i>' &/or '<i>Non-HMIS Participating Projects</i>' in the MD BoC HMIS</p>
Partner Agency HMIS Point-of-Contact	PoC	This person(s) is the primary contact between the Partner Agency and the HMIS Lead. They are responsible for ensuring that the Partner Agency adheres to all MD BoS HMIS policies and related procedures.
Personally Identifiable Information	PII	Any information maintained by or for a Partner Agency about a client 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
Point-in-Time	PIT	<u>HUD Exchange: PIT and HIC</u>
Project Descriptor Data Elements	PDDE	The Project Descriptor Data Elements (PDDE), as defined by HUD, contain basic information about projects in HMIS and help ensure HMIS is a consistent and comprehensive database of information about homelessness. The PDDEs are the 'building blocks' of HMIS.

		PDDE's are the building blocks of an HMIS.
Project Specific Data Elements	PSDE	<p>The Program Specific Data Elements (PSDE) have been designed by HUD to allow projects to meet data collection and reporting requirements per the HMIS Data Standards.</p> <p>HMIS is required to provide for the collection of these data elements and any changes to PSDEs that may change over time. PSDEs may be collected at project start, update, annual assessment, project exit and/or at every event occurrence and provide additional information about the characteristics of clients, the services they are provided, and project outcomes</p>
Rapid Re-Housing	RRH	HUD Project Type: permanent housing that provides short-term &/or medium-term tenant-based rental assistance and supportive services to households experiencing homelessness.
Permanent Supportive Housing	PSH	HUD Project Type: permanent housing that provides housing assistance (e.g., long-term leasing or rental assistance) and supportive services to assist households with at least one member (adult or child) with a disability in achieving housing stability.
System Performance Measures	SPM	<u>HUD Exchange: System Performance Measures (SPM)</u>
Transitional Housing	TH	HUD Project Type: Temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing.
Universal Data Elements	UDE	<p>The Universal Data Elements (UDEs), as defined by HUD, establish the minimum data collection requirements for all homeless, and near-homeless, housing and/or service projects entering data into HMIS, <i>regardless of funding source</i>.</p> <p>The Universal Data Elements collect information on the basic demographics of the population being served, including personally identifying information (PII), and therefore are critical to an HMIS's ability to produce the HUD required unduplicated estimates of the number of people at-risk of or currently experiencing homelessness.</p> <p>Additionally, these elements provide information about access and use of homeless assistance projects, including patterns of service use, information on shelter stays, and episodes of homelessness over time</p>
Victim Service Provider	VSP	<p>A Partner Agencies that is defined as a <i>Victim Service Provider (VSP)</i> by the HEARTH Act.</p> <p>Partner Agencies that meet this criteria are required to use a Comparable Database.</p> <p>If the Partner Agency as a whole is not a VSP – but has projects that receive federal, state, or county funds specific to DV (for example funding from FVPSA, OVC, OVW, or Specialized Housing and Services for Victims of Human Trafficking), those specific projects must also use a Comparable Database.</p>

Introduction

In 2004, the United States Department of Housing and Urban Development (HUD) mandated that all recipients of HUD homeless and prevention related funding participate in the Homeless Management Information System (HMIS). This document details the policies, procedures, guidelines, and standards that govern the operations of the MD BoS CoC Homeless Management Information System (HMIS). It outlines the roles and responsibilities of all Partner Agencies (to include staff, volunteers, contract employees, and associates) and persons with access to HMIS data, and it contains important and useful information about the ways in which HMIS data is secured and protected. *All Partner Agencies using HMIS are to read this document in full and train every MD BoS HMIS End User within its agency to understand its contents.*

HUD, Federal Partners, and the MD BoS CoC require HMIS to provide unduplicated statistical demographic reports on the numbers and characteristics of clients served as well as on program outcomes. Data about the extent and nature of homelessness in the MD BoS CoC (MD-514) are used to inform planning the structure of the homeless response system in the MD BoS CoC, including funding decisions.

The MD BoS CoC Board has the responsibility to designate a single HMIS implementation and HMIS Lead for the CoC's geography and to facilitate the evaluation of the HMIS Lead every five years, at a minimum. The MD BoS HMIS is administered by the HMIS Lead (including the HMIS Lead staff, volunteers, contract employees, and associates), as the HMIS Lead selected by the MD BoS CoC Board, and is a collaborative effort between the HMIS Lead, CoC Lead, and Partner Agencies. Each of these parties have an ongoing role in ensuring the success of HMIS by providing input into HMIS policy decisions within the parameters established by HUD.

Per HUD, the HMIS Lead is responsible for the overall management of a CoC's HMIS implementation. The MD BoS HMIS Lead agrees to carry out the responsibilities as outlined by HUD in the 'HMIS Lead Standards'; as well as additional responsibilities necessary to support day-to-day operations of HMIS reflected in the HMIS Lead MOU.

The MD BoS CoC uses an HMIS called 'Community Services' through a contract with WellSky, which provides secure storage, backup, and support for this HMIS. Community Services licenses are purchased by the HMIS Lead from WellSky for use in the CoC.

The MD BoS HMIS is an 'open' system which allows for the sharing of client-level data electronically between collaborating agencies, which must adhere to HMIS privacy policy as well as the policies and procedures in this document.

HMIS Governance

Refer to the CoC Governance Charter and HMIS Governance Charter for a full description of roles and responsibilities within the MD BoS CoC. Although Partner Agencies may choose to add supplemental requirements or policies, they ***may not supersede or contradict the policies and procedures in this document.***

HMIS Stakeholder Roles and Responsibilities

HMIS Lead

As of the date this document was approved, the MD BoS CoC has selected Maryland Department of Housing and Community Development (DHCD) to serve as the HMIS Lead for MD-514 geographic area. The HMIS Lead is responsible for the strategic development and day-to-day operations of the local HMIS, which includes, but is not limited to:

- Oversee the operation and management of HMIS
- Obtain and maintain HMIS agreements from Partner Agencies, End Users, HMIS Agency Administrators
- Maintain and oversee HMIS Vendor contract, ensuring that the Vendor:
 - a. Meets requirements of contract, including those required by HUD through its Data and Technical Standards
 - b. Maintains timely compliance with HUD Data and Technical Standards and Federal Partners

- c. Maintains HMIS to be capable of producing all HUD required reports
- Sit as Co-Chair on the HMIS Governance Committee and HMIS sub-committees
- In partnership with these committees:
 - a. Development of HMIS Governance Charter, as well as any annual updates
 - b. Development of HMIS Policies and Procedures, as well as any annual updates
 - c. Development and maintenance of Data Quality Plan, a Security Plan, and a Privacy Plan
- Generate and submit the CoC's AHAR, HIC, PIT, and SPM data
- Application for HUD CoC Program HMIS dedicated grant funds
- Monitoring of all Partner Agencies to ensure compliance with all HMIS Policies and Procedures, as well as with HUD regulations
- Presentation of annual reports to the MD BoS CoC Board as requested

CoC General Membership

MD BoS CoC General Membership is comprised of agencies providing housing / services to persons who are homeless, or at risk of homelessness, (as defined by HUD) in the geographic area of MD-514.

Much of the direct work to fulfill CoC responsibilities is done at the committee level. MD BoS CoC Member Agencies are strongly encouraged to designate representatives to join MD BoS HMIS committees. Refer to the MD BoS HMIS Governance Charter for committee details.

HMIS Governance Committee

This committee will focus on developing and maintaining HMIS policies and procedures in accordance with HUD requirements. The committee will also review HUD CoC data reports prior to the HMIS Lead submitting to HUD; and oversee any HMIS sub-committees.

Committee members must be an employee, contract employee, or official volunteer of a Partner Agency that is a recipient/sub-recipient of funds outlined in the MD BoS HMIS Policies & Procedures document section 'Eligibility Requirements for Agencies' **and** has signed the '*MD BoS HMIS Partner Agency Point-of-Contact Agreement*'. Partner Agencies with multiple designated PoC's are to select a single PoC to represent the agency on the HMIS Governance Committee.

Refer to the HMIS Governance Charter for a full description of HMIS Governance Committee and HMIS Sub-Committees roles and responsibilities.

HMIS Sub-Committees

The HMIS Governance Committee is the hub for making strategic decisions that drive the day-to-day operations of HMIS. Due to the extensive amount of responsibility this covers, the HMIS Governance Committee will establish, as necessary, sub-committees whose work in HMIS will focus on specific areas assigned by the HMIS Governance Committee.

Committee members must be an employee, contract employee, or official volunteer of a Partner Agency that is a recipient/sub-recipient of funds outlined in the MD BoS HMIS Policies & Procedures document section 'Eligibility Requirements for Agencies'.

HMIS Organization & Management

System Administration and Availability

All HMIS questions and issues should be directed to the HMIS Lead via the Helpdesk.

The MD BoS HMIS website, [Community Services](#), is typically available to Partner Agencies 24 hours a day, 7 days a week. When possible, End Users will be notified in advance of planned outage or issues impacting availability via the *HMIS Home: System News*, [MD BoS HMIS Website](#), &/or *HMIS Newsletters*.

Technical Support

The MD BoS HMIS Team is generally available workdays from 9:00am – 5:00pm EST to provide support for HMIS.

Support can be requested by submitting a ticket to the HMIS Helpdesk by [CLICKING HERE](#).

Partner Agencies are responsible for providing their own technical support for all hardware and software systems used to connect to HMIS and for maintaining internet access.

Requirements of Participating in MD BoS HMIS

Agencies that join the MD BoS HMIS are referred to as a 'Partner Agency'. ***Regardless of fund source***, any agency that participates in the MD BoS HMIS, either voluntarily or by funding requirement, must abide by all MD BoS HMIS policies and related procedures.

To request HMIS access for a **NEW** Partner Agency, End User, or to have new project set up in HMIS please contact the Help Desk.

Eligibility Requirements for Agencies

*Private citizens are **prohibited** from joining HMIS as their own Partner Agency.*

Agencies requesting to join HMIS must provide documentation showing that they have current standing as a member of the Maryland Balance of State Continuum of Care (refer to the MD BoS CoC Governance Charter for addt'l information), and:

- Are one of the following agency types:
 - Nonprofit Organization
 - State or local government
 - County Agency/Department
 - Public housing agency
- ***And*** operate a project(s) that provides housing / services to persons who are homeless, or at risk of homelessness, (as defined by HUD) in the geographic area of MD-514. Homeless project types include:
 - Coordinated Entry
 - Day Shelters and Drop-In Centers for persons who are homeless
 - Emergency Shelters serving homeless adults, families, and youth
 - Homeless Prevention
 - Permanent Supportive Housing programs (whether scattered site or on-site)
 - Rapid Re-housing programs
 - Street and Community Outreach programs to persons who are homeless
 - Supportive Service programs serving persons who are homeless
 - Transitional Housing programs
- ***And*** commit to enter data into HMIS per the MD BoS HMIS policies and related procedures, including, but not limited to, those outlined in this document, the MD BoS HMIS Data Quality Plan, and the Privacy Policy

Agencies that are recipients, or subrecipients, of funds listed below are required to participate in the MD BoS HMIS:

- **Department of Housing and Urban Development (HUD)**
 - Continuum of Care Program (CoC)
 - Emergency Solutions Grant (ESG)
 - Housing for Persons with AIDS (HOPWA)
- **Department of Health and Human Services (HHS)**

- Projects for Assistance in the Transition from Homelessness (PATH)
- Runaway and Homeless Youth Program (RHY)
- **Department of Veteran Affairs (VA)**
 - Supportive Services for Veteran Families (SSVF)
 - GPD: Case Management/Housing Retention
 - HUD-VASH
 - HUD-VASH, Other Than Honorable (OTH) projects, called "HUD-VASH Continuum," that have been in operation since FY 18 that are not able to use HOMES and therefore are required to participate in HMIS for data collection purposes
 - All HUD-VASH projects must have PDDE's in HMIS, *regardless* of whether client level data is collected in HMIS
- **Maryland Department of Housing and Community Development**
 - Funds to provide housing / services to persons who are homeless, or at risk of homelessness, (as defined by HUD) in the geographic area of MD-514 that are granted at the State level by the Maryland Department of Housing and Community Development (MD DHCD) **and** that stipulate the use of MD BoS HMIS

In addition to meeting the requirements stated above, the HMIS Lead reserves the right to request formal documentation that the agency is (or will be) part of the MD BoS CoC homeless response system, for example:

- Documentation from the MD BoS CoC Lead verifying the agency:
 - Has a formal role in one or more of the local LHC's Coordinated Entry Systems (CES)
 - Provides housing / services to persons that are homeless, or at risk of homelessness, (as defined by HUD) in the geographic area of MD-514
- Documentation that they agency receives funding from a source that requires HMIS participation and data entry

Eligibility Requirements for HMIS Projects

Projects in the MD BoS HMIS must meet the same requirements listed above for agencies. Partner Agencies may have projects in HMIS that are categorized as either an 'HMIS Participating' project or a 'Non-HMIS Participating' project.

- **HMIS Participating Project:** Are projects that are either required by a funder to, or the Partner Agency has opted to, enter client level data into the CoC's HMIS
- **Non-HMIS Participating Project:** Are projects that do not enter client level data into the CoC's HMIS but are required to provide aggregate client level data to the CoC for reporting purposes. (Example: VSP's, HUD-VASH, etc.)

Only Partner Agencies that have a current 'Partner Agency Agreement' with the HMIS Lead can submit a request to add a *new* project to the MD BoS HMIS. The Partner Agency will submit an HMIS Project Request Form that contains the required project information (project type, funding source, target population(s), and beds, etc.) to the HMIS Lead who will configure data collection appropriately for the Partner Agency in HMIS. Incomplete, or incorrect, project information may result in improper data collection and reporting.

Forms should be submitted at least 10 business days prior to the start of the project to allow enough time for processing.

Eligibility Requirements for Individual End Users

Private citizens are **prohibited** from joining HMIS as an individual.

Currently, the MD BoS CoC provides HMIS End User licenses to Partner Agencies at **no cost**. Priority of HMIS license allocations will be determined by the HMIS Lead based on need and availability.

However, as the CoC grows and Partner Agency needs for HMIS access increase, it may become necessary to implement an HMIS license fee structure. Should this occur, the CoC and HMIS Leads will consult with the CoC Governance Board and HMIS Governance Committee to establish an equitable process.

Each Partner Agency must have at least one paid employee, contract employee, or official volunteer who is eligible to become an MD BoS HMIS End User. HMIS End Users, that are contract employees and/or official volunteers with a Partner Agency, must be subject to the same vetting and training as paid staff who become HMIS End Users.

MD BoS HMIS End Users:

- Cannot have received services from a Partner Agency in previous 12-months
- Must be:
 - At least 18 years old
 - A current employee, or documented volunteer, of an MD BoS HMIS Partner Agency
- Possess basic computer skills
- Complete training outlined in the 'HMIS Training' section
- Have a valid MD BoS HMIS End User Agreement on file with the HMIS Lead
- Agree to adhere to the MD BoS HMIS policies and related procedures, including, but not limited to, those outlined in this document, the MD BoS HMIS Data Quality Plan, and the Privacy Policy

The Partner Agency is ultimately responsible for the actions of its End Users and supervision, in accordance with the Partner Agency Agreement.

Review of Requests to Join HMIS

Agency and End User requests to join the MD BoS HMIS are to be sent to the HMIS Lead via the Helpdesk, who will review the request and make the final determination. Requests may be denied if documentation is incomplete and/or if the agency or individual role within the MD BoS CoC homeless response system remain ambiguous and/or do not fit a clear use case for accessing HMIS.

If the HMIS Lead denies the request to join the MD BoS HMIS, the requesting agency/individual may seek to join again in one year following the denial.

Requests to join the MD BoS HMIS that do not meet the above criteria may be approved by the HMIS Lead on a case-by-case basis.

Partner Agency Agreement

A Partner Agency, *regardless of fund source*, is defined as an agency that serves those who are experiencing homelessness, or at risk of homelessness, (as defined by HUD) in the geographic area of MD-514. A Partner Agency may have projects in HMIS that are categorized as either an 'HMIS Participating' project or a 'Non-HMIS Participating' project.

- **HMIS Participating Project:** A project that is either required by a funder to, or has opted to, enter client level data into the CoC's HMIS
- **Non-HMIS Participating Project:** A project that does not enter client level data into the CoC's HMIS but is required to provide aggregate client level data to the CoC for reporting purposes (Example: Domestic Violence Shelters, HUD-VASH, etc.).

Each Partner Agency will submit a signed HMIS Partner Agency Agreement to the HMIS Lead. This agreement underwrites the legal relationship between a Partner Agency and the HMIS Lead as it relates to HMIS responsibilities and compliance with policies and procedures. The Partner Agency Agreement must be signed by the Partner Agency's executive director or equivalent as authorized by the agency. The HMIS Lead will retain the signed agreement.

In addition to HMIS Partner Agency Agreement, Partner Agencies may be required to complete additional agreements depending on the legal requirements that the Partner Agency is obliged to. *It is the responsibility of the Partner Agency* to determine whether any additional agreements are needed to comply with any laws or regulations that apply to the Partner Agency, such as HIPAA or Federal Drug and Alcohol Confidentiality Regulations (42 CFR Part 2). However,

additional agreements **may not** supersede or contradict MD BoS HMIS policies and procedures.

Partner Agency Security Requirements

While the HMIS Lead and the HMIS Vendor maintain the software for HUD standards, Partner Agencies are responsible for complying with the below agency-level system security standards. These system standards aid in the safety and integrity of client records. Partner Agencies must comply with the following minimum technology standards:

Internet Requirements

A secure broadband internet must be used; Wi-Fi is acceptable if the connection is protected by a network security code. Slow system response times that may arise as a result of slow internet connections cannot be controlled by the HMIS Lead or the HMIS Vendor.

Computer Requirements

All devices utilized to access HMIS must:

- Automatically lock after a short period of inactivity. This serves as a safeguard in the event of a licensed user leaving an unattended workstation unlocked when they are actively logged into HMIS
- Have an operating system compatible with the current HMIS software
- Have an internet browser compatible with current HMIS software. No additional plug-in is required to access HMIS
- Have regular virus protection updates

Partner Agency Responsibility

The equipment used to connect to HMIS is the responsibility of the Partner Agency. Contributing Partner Agencies will need to provide their own internal technical support for the hardware, software, and Internet connections necessary to connect to HMIS according to their own organizational needs. Agencies must demonstrate compliance with these security requirements during the annual monitoring with the CoC &/or HMIS Lead.

Partner Agency HMIS Point-of-Contact

Executive Leadership at each Partner Agency must select at least one person to act as the designated Partner Agency HMIS Point-of-Contact (PoC). Multiple contacts may be appropriate for large agencies that operate multiple project types. The PoC serves as the primary contact between the Partner Agency and the HMIS Lead to ensure that the Partner Agency adheres to all MD BoS HMIS policies and related procedures, this includes:

- Serve as the primary contact between the Partner Agency and the HMIS Lead
- Being responsive to questions and requests from the HMIS Lead related to HMIS data quality and compliance
- Must have a valid email address and be an **active**, trained HMIS End User with a strong working knowledge of HMIS data entry workflow requirements
 - At least 1 HMIS PoC at each Partner Agency will also have an ART Report Viewing license in order to run higher level data quality reports
- Ensure the Partner Agency responds to and acts upon data quality concerns appropriately to ensure that the overall data quality within HMIS is acknowledged and improved in an ongoing, objective, and data-driven manner
- Ensure that the Partner Agency obtains a unique HMIS license for each End User at the agency, and that HMIS access is granted only to staff members that have completed New HMIS End User training, submitted a signed End User Agreement, and are authorized to use HMIS. This includes:
 - Making the HMIS Lead aware of any changes to End Users at the Partner Agency in accordance with the Partner Agency Agreement
 - Ensuring each End User completes the Privacy & Security Training each year
- Providing updated Partner Agency/HMIS project information, according to the HMIS Policy and Procedures, to the HMIS Lead. This includes, but is not limited to, providing notification about new projects, new End

Users, End Users that need removed from HMIS &/or need EDA access changed, project closing, and any changes to Project Descriptor Data Elements (PDDE's) for existing projects – including changes to bed/unit inventory and funding

- Understand and comply with HMIS data collection and reporting requirements of both the CoC and those that fund projects at their agency
- Responsible for the quality and accuracy of HMIS data as outlined in the HMIS Data Quality Plan; therefore must have access to all client data, End User data, and HMIS project information (including fund sources) for the Partner Agency
- Ensures compliance with the HMIS Policy and Procedures, including that the Privacy Notice is posted and visible to all clients
- Immediately report any violations of HMIS policies or procedures to the HMIS Lead
- Review and process all client requests to review their data in HMIS and grievances
- Ensure that all HMIS client records for individuals that complete the HMIS Client Data Sharing Opt-Out Form are properly restricted
- PoCs that are an employee, contract employee, or official volunteer of a Partner Agency that is a recipient/sub-recipient of funds outlined in the MD BoS HMIS Policies & Procedures document section 'Eligibility Requirements for Agencies' are responsible for:
 - Attend **HMIS Governance Committee** meetings (Partner Agencies with multiple designated PoC's must select a single PoC to represent the agency on the HMIS Governance Committee.)
 - Attend, or designate staff from the Partner Agency to attend, the **HMIS Sub-Committees**

Use of a Comparable Database by Victim Service Providers (VSP)

Partner Agencies that are defined as a *Victim Service Provider* (VSP) by HEARTH Act must use a Comparable Database, rather than the MD BoS HMIS. **Or** if the Partner Agency as a whole is *not* a VSP – but has projects that receive federal, state, or county funds specific to DV (for example funding from FVPSA, OVC, OVW, or Specialized Housing and Services for Victims of Human Trafficking), those specific projects are required to use a Comparable Database. A comparable database is a relational database that meets all HMIS Data Standards and the minimum standards of HMIS privacy and security requirements, including HUD's most recent reporting standards and comma separated value (CSV) format specifications.

Partner Agencies using a Comparable Database are required to collect client-level data consistent with MD BoS HMIS data collection requirements.

Partner Agencies serving survivors of domestic violence &/or sexual assault **that do not meet this criteria** must use the MD BoS HMIS.

HUD resources for HMIS Data Standards and Comparable Databases:

- <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>
- <https://www.hudexchange.info/resource/6305/hmis-comparable-database-manual/>
- <https://www.hudexchange.info/resource/5743/hmis-when-to-use-a-comparable-database/>

HMIS Training

HMIS New User Training

All End Users are required to complete HMIS New End User Training prior to receiving access to the system.

Timely and Successful Completion

Once a new End User begins HMIS End User training, they have 4-weeks to complete the training.

If the HMIS Lead determines that a new End User fails to grasp the necessary data entry concepts, the HMIS Lead may use their discretion to require new End Users to repeat training or to make other accommodations as needed. If a new End User fails to successfully complete training after repeated attempts, the HMIS Lead may use their discretion to determine that the new End User is not capable of accurate and complete data entry and may refuse to issue an HMIS End User license &/or offer to issue a 'Read Only' license.

HMIS Ongoing Training

Annual Data Privacy & Security Recertification Training

In order to retain their HMIS license, all End Users are required to attend annual training provided by the HMIS Lead. This training covers data privacy, security, and confidentiality. Failure to complete the training within 30-days will result in de-activation of the end user's license.

Additional Recertification Training

At the discretion of the HMIS Lead, End Users may be required to complete a recertification training in the event of significant changes to data collection requirements, data entry workflow, or HMIS policies and procedures. End Users who do not complete recertification training within 30-days of a training being made available may have their HMIS licenses suspended until training has been completed.

Refresher Training

The HMIS Lead may require an End User repeat New End User training if: **(a)** Data entered by a current End User does not meet minimum data quality standards; **(b)** An End User has not accessed the system within 14 days of completing New End User Training; **(c)** The End User's license is inactivated due to not accessing HMIS once every 30-days.

Security and Access

Passwords

Passwords must meet system requirements. They are the individual End User's responsibility and users are strictly prohibited from sharing passwords. Any passwords that are written down are to be stored securely and must be inaccessible to other persons. Passwords must never be stored in plaintext on a digital device or cached in a browser or other local storage.

Notification of HMIS Departure

The Partner Agency must notify the HMIS Lead of any users that are no longer employed by the Partner Agency or otherwise need their access removed within 24 hours of the user's departure.

Hard Copies of Client-Level HMIS Data

Any HMIS data entry forms, reports, or other hard copies that include client-level personally identifiable information (PII) for or from HMIS are subject to data security measures. Partner Agency staff must always supervise such hard copies when in a public area and keep hard copies in a secure file when staff are not present. Hard copies must be destroyed when no longer needed, unless doing so is prohibited by agency record retention policies.

Notification of Security Incidents Within 24 Hours

Partner Agencies & End Users must report all unlawful access of HMIS and unlawful attempted access of HMIS. This includes borrowing, loaning, sharing, or theft of usernames and passwords. Security incidents should be reported to the HMIS Lead within 24 hours of their discovery. The HMIS Lead will use HMIS audit reports to determine the extent of the breach of security.

Violation of Security Procedures

All potential violations of these security protocols will be investigated by the HMIS Lead. Partner Agencies and End Users

will be subject to sanctions as described in Section 'Violation of HMIS Policies' of these policies.

All confirmed security violations will be communicated in writing to the affected client by the Partner Agency within 14 business days, unless the client cannot be located. If the client cannot be located, a written description of the violation and efforts to locate the client will be prepared by the HMIS Lead and placed in the client's file at the Partner Agency that originated the client's record.

Disaster Recovery Plan

In the event of a disaster impacting some or all of our CoC, Community Services access and availability is unlikely to be impacted. The servers that host our Community Services software are located in multiple locations outside of our CoC.

Access to Community Services requires internet access, so any disaster which impacts internet access for some or all HMIS users will render Community Services unreachable by them until that internet interruption is resolved.

If Partner Agencies are still serving clients during an internet outage, all client data must be collected on HMIS paper assessment forms, and then entered into HMIS once internet service is restored.

Data Ownership & Privacy

The HMIS Lead and Partner Agencies are jointly responsible for complying with HMIS privacy policies and related procedures. If a privacy standard conflicts with other federal, state, and local laws to which the Partner Agency must adhere, the Partner Agency must contact the HMIS Lead to collaboratively update the applicable policies for the Partner Agency to accurately reflect the additional protections.

The MD BoS HMIS is an 'open' system which allows for the sharing of client-level data between Partner Agencies as means to implement Coordinated Entry, reduce data collection and entry burden, and facilitate other coordination between the Partner Agencies. **Partner Agencies may not create "Anonymous" records in HMIS.** However, they are able to create a record that is not shared (see the HMIS Privacy Policy for details).

MD Bos HMIS Data Ownership & Use Cases

Ownership

MD BoS HMIS, including any and all data stored in the MD BoS HMIS, is the property of HMIS Lead. The HMIS Lead has authority over the creation, maintenance, and security of HMIS including distribution of the data stored within. Violations of HMIS Partner Agency agreement, the HMIS Policies and Procedures, and/or HMIS Privacy Policies may be subject to discipline and/or termination of access to HMIS, per the 'Violation of HMIS Policies' section.

Agencies that hold membership in the Maryland Balance of State Continuum of Care, including MD BoS HMIS Partner Agencies, **may not** enter into contracts with any HMIS vendor.

Because Partner Agencies in the MD BoS HMIS receive various funding streams with varying data collection/reporting requirements, the HMIS Lead shall maintain ownership of the database in its entirety in order that these funders cannot access data to which they are not legally entitled.

Use Cases: Research Uses and Publication of HMIS Data

- Partner Agencies may **not respond** to any request for data that includes PII unless the request originates from another Partner Agency within the MD BoS HMIS.
 - If a Partner Agency does not know if the entity requesting data is also a Partner Agency in the MD BoS HMIS, they are to verify with the HMIS Lead
- All data requests that include PII from any non-Partner Agency must be **immediately forwarded to the HMIS Lead**. The HMIS Lead will evaluate and respond to such requests as appropriate (see the Privacy Policy for details).

Research uses and publication of HMIS data are governed by HMIS policies, including the HMIS Privacy Policy, Partner Agency Agreements, and Maryland State HMIS Data Warehouse (MSHDW) Agreements (as defined by funder in grant

agreements).

The HMIS Lead will address all requests for data from entities other than Partner Agencies or clients. No individual client data will be provided to any group or individual, that is not detailed in the HMIS Privacy Policy without proper authorization or consent.

The HMIS Lead will make every effort to ensure that data is not released in an aggregated report from a data set that is small enough or unique enough to allow identification of an individual client's information to be extracted from the report. If it is determined that a preliminary report may not be published due to concerns of release of identifiable data, the HMIS Lead will remove postings, delete electronic files, and notify review partners to destroy any copies of the report.

Requests should detail all data uses and frequency of data pulls and reporting across the span of an agreed upon timeline, so that separate permission is not needed for each individual data use.

Client-level data may be released for research purposes by the HMIS Lead. Based on criteria in the HMIS Privacy Policy, the HMIS Lead will approve or deny requests to release data based on the potential benefits and costs to clients, Partner Agencies, and other stakeholders.

The HMIS Lead, CoC or CoC Lead may also issue periodic public reports about homelessness and housing issues in the areas covered by HMIS. No individually identifiable client data will be reported in any of these documents.

HMIS Privacy Policy

Privacy Policy

Privacy is the expectation that a person's sensitive information is protected and not being shared with others without their consent. All person's receiving services from Partner Agencies in the MD BoS CoC have a right to know where their information is being stored, who has access to it, and what it is being used for.

The MD BoS HMIS Privacy Policy is administered by the designated HMIS Lead. The CoC may amend the HMIS Privacy Policy at any time. Amendments may affect Personally Identifiable Information (PII) that Partner Agencies obtained before the effective date of the amendment.

Implied Consent

The MD BoS HMIS operates under '**Implied Consent**', meaning that persons applying for &/or receiving services from an MD BoS HMIS Partner Agency agrees to allow End Users to use &/or disclose information as described in the HMIS Privacy Policy. *An ROI is not required to share client data.* Except for instances outside of what is outlined in the HMIS Privacy Policy. **Entering** data into HMIS does *not* require consent. However, Clients do have the right to choose **not to share** their information by completing the '*MD BoS HMIS Client Data Sharing Opt-Out Form*' (see the HMIS Privacy Policy for details).

Each Partner Agency must post the HMIS Privacy Notice at each intake or comparable location (for example Street Outreach should print and take with when doing outreach, or have an electronic version available) and on its web site (if applicable), explaining the reasons for data collection for those seeking services.

Implied Consent is utilized for **sharing** data in HMIS. If a client chooses to not *share* their data through HMIS, *all of the client's data should still be collected and stored in HMIS*, but the Partner Agencies HMIS record for the client must be changed to 'Restricted' (see the How To Guide for instructions on restricting client records in HMIS).

Clients must give permission for the disclosure and/or use of any client data outside of the HMIS Privacy Policy.

Partner Agency Responsibilities

At a minimum, the Partner Agency must meet the following standards:

- Partner Agencies must post the HMIS Privacy Notice where it is viewable by clients at each intake desk or comparable location explaining the reasons Personally Identifiable Information (PII) is requested (for example, Street Outreach should print and take with when doing outreach, or have an electronic version available).
 - The HMIS Privacy Notice must be reviewed with all clients at intake to provide information on their

rights and HMIS policies related to personal data.

- Partner Agencies must ensure that all End Users are trained to properly explain the Privacy Policy to clients. (scripted talking points that EUs can use with clients is located in the appendix of this document)
- Provide client with the full HMIS Privacy Policy upon request
- If client refuses to share their data collected in HMIS, the Partner Agency must provide them with the '*HMIS Client Data Sharing Opt-Out Form*', and complete the steps to ensure the Partner Agencies HMIS record for the client is properly restricted in HMIS
- Partner Agencies will **not decline** to provide any services to a client based upon a client's refusal to **share** information in their HMIS client record. However, clients should be informed that not sharing the information may limit collaboration with other Partner Agencies that they may be eligible to receive services from; and will prevent them from being on the CoC's By-Name-List (BNL)
- Further, Partner Agencies **may not** limit client service or refuse to provide service in a way that discriminates against clients based on information the Partner Agency obtained from HMIS. Partner Agencies **may not** penalize a client based on historical data contained in HMIS.

Additional Privacy Responsibilities of Partner Agencies

Partner Agencies may have additional policies not required by the HMIS Lead that they must follow, **but at a minimum**, they must adhere to the MD BoS HMIS Privacy Policy & additional policies **may not supersede or contradict the policies and procedures in this document**.

Partner Agencies that are also Covered Entities under *HIPAA* and any program subject to *42 CFR Part 2* must obtain a signed Release of Information form before authorizing the HMIS Lead to use or disclose PII information entered into HMIS. If a client does not sign the Release of Information form, information **may be entered** into HMIS, **but PII may not** be further disclosed. The information may be used by the HMIS Lead as permitted by law and HMIS Privacy Policy. It is the responsibility of the Partner Agency entering information about a client to ensure compliance with HIPAA, including: ensuring that all appropriate HIPAA Notices have been provided to clients; determining whether consent has been obtained; making appropriate entries to either designate the information as appropriate for use or disclosure by the HMIS Lead or to prohibit such use or disclosure; and implementing any restrictions on the use of the information.

Covered Entities must present a separate ROI form to each adult that is seeking services, regardless of whether a ROI form has been presented to them in the past.

Data Collection & Quality

Data quality is a term that refers to the reliability and validity of client-level data collected in HMIS. It is measured by the extent to which the client data in the system reflects actual information in the real world. To present accurate, consistent information and outcome measures on homelessness, it is critical that HMIS have the best possible representation of reality as it relates to persons experiencing homelessness and the projects that serve them.

Specifically, the goal is to record the most accurate, complete, consistent, and timely information in order to evaluate the extent of homelessness, service gaps, and project impact on the homeless service system.

Project Descriptor Data Elements (PDDE)

A Partner Agency projects in the MD BoS HMIS are configured by the HMIS Lead to collect the required data elements based on information provided by the Partner Agency. The HMIS Lead will consult with the Partner Agency in an attempt to ensure proper setup, but responsibility for complying with funder requirements lies with the Partner Agency.

Regardless of funding, all Partner Agencies are required to provide PDDE information to the HMIS Lead, and for Partner Agencies entering client data, they must collect and record data in accordance with the HMIS Data Quality Plan.

You can find more information on requirements for [HUD HMIS Project Descriptor Data Elements \(PDDE\)](#) here.

Partner Agencies HMIS PoCs are responsible for notifying the HMIS Lead, using the applicable '*HMIS Project Request Form*', of:

- HMIS New Projects: At least 10 business days prior to the project's operating start date
- HMIS Project Changes/Updates: Are to be reported to the HMIS Lead within 5 business days of the change occurring. This ensures that proper data elements are collected and reported correctly
- HMIS Project Closure: Within 10 business days of the project's closure. Prior to informing the HMIS Lead that a project needs to be closed in HMIS, agencies are responsible for ensuring that 1) Project data complies with standards set forth in the Data Quality Plan; 2) All clients have been properly exited from the project.

Minimum Data Collection Requirements

Partner Agencies are responsible for ensuring that their 'HMIS Participating Projects' ask all clients a minimum set of questions, or data elements. These required data elements are reflected in the HMIS assessments and they include:

- (1) Universal Data Elements (UDE) required federally by HUD
- (2) Program-Specific Data Elements (PSDE)

Partner Agencies may collect additional information beyond the minimum required data elements, as long as the collection of the additional data elements **does not** supersede or contradict the data collection requirements outlined in the MD BoS HMIS Data Quality Plan.

Partner Agencies may not create "Anonymous" records in HMIS. However, they are able to create a record that is not shared (see the Data Privacy section for further information).

Further information of HMIS data quality expectations is outlined in HMIS Data Quality Plan.

Appropriate Data Collection

The purpose of HMIS is to support the delivery of homeless and housing services in the MD BoS CoC. Lawful and fair means will be used in the use, collection, and maintenance of data in HMIS (refer to the HMIS Privacy Policy for more information). HMIS should not be used to collect or track information not related to serving people in the MD BoS CoC homeless response system or otherwise required for policy development, planning, or intake purposes.

Partner Agencies will ask the HMIS Lead for any necessary clarification of appropriate data collection. The HMIS Lead, in consultation with the HMIS Governance Committee and HMIS sub-committee(s), will make decisions about the appropriateness of data being entered into the database. The HMIS Lead may periodically audit a Partner Agencies data collection practice to ensure the database is being used appropriately.

Data Integrity

Partner Agencies are responsible for the accuracy of data entered by their HMIS End Users.

- Partner Agencies are responsible for ensuring that data entry by End Users adheres to the MD BoS HMIS policies and related procedures and for the accuracy of the data entered
- Data may also be used to measure program efficacy, which influences funding opportunities during competitive funding processes such as the annual Continuum of Care application to HUD or annual ESG applications

To monitor the integrity of data contained in HMIS, the HMIS Lead may perform periodic data quality checks by examining the accuracy, completeness, consistency, and timeliness of data entered into HMIS. Further information of HMIS data quality expectations and monitoring is outlined in HMIS Data Quality Plan.

On-Site Review

To monitor compliance with the HMIS Policies and related procedures, including, but not limited to, those outlined in this document, the HMIS Privacy Policy, HMIS Data Quality Plan, and HMIS Agency Participation Agreements, the HMIS Lead will conduct periodic on-site reviews of Partner Agencies. The exact procedures for on-site reviews will be determined in advance of the actual on-site review.

Clients Rights

Right to Services

Partner Agencies will **not decline** to provide any services to a client based upon a client's refusal to **share** information in their HMIS client record. However, clients should be informed that not sharing the information may limit collaboration with other Partner Agencies that they may be eligible to receive services from; and will prevent them from being on the CoC's By-Name-List (BNL).

Further, Partner Agencies **may not** limit client service or refuse to provide service in a way that discriminates against clients based on information the Partner Agency obtained from HMIS. Partner Agencies **may not** penalize a client based on historical data contained in HMIS.

Client Access to Records

Clients may inspect and have a copy of their PII that is maintained in their HMIS client record, *with the exception of case notes*. The Partner Agency where the client receives services, will respond to requests by clients to inspect their HMIS record and offer to explain any information that a client may not understand (See the HMIS Privacy Policy for details).

The Partner Agency will ensure that any requests for inspection and correction of personal information will be responded to, **OR** communicate a clear alternate timeline for fulfilling the request, will be communicated to the client in writing within 14 business days. The Partner Agency will offer to explain any information in the HMIS client record.

The Partner Agency will pull the '0401 – Client Program History' report from HMIS: Business Objects and provide it to the client for review.

Clients are not entitled to identifying information about End Users who interacted with their record.

If the information listed in HMIS is believed to be inaccurate or incomplete, a client may submit a verbal or written request to the Partner Agency where the client receives services, to have their information corrected. Inaccurate or incomplete data may be corrected or supplemented with additional information. The client is not entitled to identifying information about End Users who interacted with their record.

Per the 'HMIS Data and Technical Standards Final Notice', Partner Agencies may deny a request to inspect or copy one's personal information if:

- The information was compiled in reasonable anticipation of litigation or comparable proceedings
- The information is about another individual
- The information was obtained under a promise of confidentiality and if the disclosure would reveal the source of the information
- Disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual

The Partner Agency may reject repeated or harassing requests for access or correction. If a client's request to view or correct their personal information is denied, the Partner Agency with which the client initiated the request will explain the reason for the denial. The client's request and the reason for the denial will be included in the client's HMIS record, by way of uploading documentation to the 'File Attachments' section within the client's HMIS record. Within 1 business day of the denial, the Partner Agency must report all client requests that are denied, along with reasoning for the denial, to the HMIS Lead.

Client Grievances

Each Partner Agency is to have a documented grievance process for their agency that allows clients, who believe that their rights have been violated related to their personal or private data held in HMIS, to file a written complaint (See the HMIS Privacy Policy for details). The Partner Agency must make a client grievance form available to clients upon request. A sample form that Partner Agencies can use can be requested from the HMIS Lead. The Partner Agency must respond within 14 business days of receiving the grievance being received. If the client believes that their shelter or services may be threatened due to the complaint, a complaint may be made directly to the HMIS Lead, who will also respond within 14 business days.

The complaint should first be filed with the Partner Agency serving the client and the Partner Agency is to send a copy of the complaint to the HMIS lead within 1 business day of receiving complaint.

The HMIS Lead will act as a final arbiter of any complaints not resolved between a client and the Partner Agency (see the Privacy Policy for details).

The Partner Agency, and CoC as a whole, are prohibited from retaliating against clients for filing a complaint.

Violation of HMIS Policies

Partner Agency &/or End User Violations

HMIS End Users and Partner Agencies must abide by all HMIS policies and related procedures including, but not limited to, the HMIS Policies & Procedures Manual, HMIS End User Agreement, and HMIS Partner Agency Agreement. Repercussion for any violation will be assessed in a tiered manner.

Violations do not need to be of the same type in order to be considered a second or third violation. Violations do not expire. No regard is given to the duration of time that occurs between successive violations of HMIS operation policies and procedures as it relates to corrective action. Any End User or Partner Agency violations may be appealed, within 5 business days of receiving, to the HMIS Lead.

- First Violation – the End User and Partner Agency will be notified of the violation in writing by the HMIS Lead. The End User's license will be suspended for 30 days, or until the Partner Agency notifies the HMIS Lead of action taken to remedy the violation. The HMIS Lead will provide necessary training to the End User and/or Partner Agency to ensure the violation does not continue. The HMIS Lead will notify the HMIS Governance Committee of the violation during the next scheduled HMIS Governance Committee meeting following the violation.
- Second Violation – The End User and Partner Agency will be notified of the violation in writing by the HMIS Lead. The End User's license will be suspended for 30 days. The End User and/or Partner Agency must take action to remedy the violation; however, this action will not shorten the length of the license suspension. If the violation has not been remedied by the end of the 30-day End User license suspension, the suspension will continue until the Partner Agency notifies the HMIS Lead of the action taken to remedy the violation. The HMIS Lead will provide necessary training to the End User and/or Partner Agency to ensure the violation does not continue. The HMIS Lead will notify the HMIS Governance Committee of the violation during the next scheduled HMIS Governance Committee meeting following the violation.
- Third Violation – the End User and Partner Agency will be notified of the violation in writing by the HMIS Lead. The End User's license will be suspended for a minimum of 30 days, or until the HMIS Lead has been able to determine if the End User's license should be terminated, whichever occurs later. If the HMIS Lead determines the End User should retain their user license, the HMIS Lead will provide necessary training to the End User and/or Partner Agency to ensure the violation does not continue. If End Users who retain their license after their third violation have an additional violation, their license may be immediately terminated. The HMIS Lead will notify the HMIS Governance Committee of the violation during the next scheduled HMIS Governance Committee meeting following the violation.

Any End User or other fees paid by the Partner Agency will not be returned if an End User's or Partner Agency's access to HMIS is revoked.

Notifying the HMIS Lead of a Violation

It is the responsibility of each Partner Agency, HMIS Partner Agency PoC, and individual End Users to notify the HMIS Lead within 24 hours of when they suspect that an End User or Partner Agency has violated any HMIS operational agreement, policy, or procedure. A complaint about a potential violation must include the name of the End User and Partner Agency, along with a description of the violation, including the date or timeframe of the suspected violation. Complaints should be sent in writing to the HMIS Lead via the Helpdesk. The name of the person making the complaint will not be released from the HMIS Lead if the individual wishes to remain anonymous.

Violations of Local, State or Federal Law

Any Partner Agency or End User violation of local, state, or federal law will immediately be subject to the consequences listed under the Third Violation above.

Potential to Escalate

All violations will be assessed by the HMIS Lead and depending on their severity may be subject to the consequences listed under the Third Violation above.

Multiple Violations within a 12-Month Timeframe

During a 12-month calendar year, if there are multiple End Users (three or more) with multiple violations (two or more) from a single Partner Agency, the Partner Agency as a whole will be subject to the consequences listed under the Third Violation above.

Appendix A: Talking To Clients About The HMIS Privacy Policy

The HMIS Privacy Notice must be reviewed with **all clients** seeking services from your agency to provide information on their rights and HMIS policies related to personal data.

For clients not comfortable sharing their information, it is also important that you explain to them what the consequences could be for other Partner Agencies not to have access the information.

**** Below are generic scripts for both situations.**

Initial Client Meeting

I need to gather some information from you in order to determine what services you could be eligible for. Before we begin, let me explain how this information will be used.

- HUD, state, county, and local partners require that every agency receiving funds to serve those experiencing homelessness collect basic information from their clients using a computerized Homeless Management Information System (HMIS)
- This helps me, and my colleagues in the community, quickly determine all services that are available for you. The MD BoS HMIS is an “open” system, which means that:
 - Client data in the system is shared electronically between collaborating agencies, who must adhere to strict guidelines set in the MD BoS HMIS Policy & Procedures, as well as the MD BoS HMIS Privacy Policy; and
 - It can save you time should you need to access services from other agencies in the community that use HMIS. Since they will be able to view this information you are providing me – rather than starting from scratch, they will be able to simply verify & update your information as needed.
- If you would like additional detailed information about our communities Privacy Policy or how the data is used, you can ask for a copy of the Privacy Policy at any time

If a Client Does NOT Want to Share Their Information in HMIS

- I understand that you are not comfortable with your information being shared with other agencies in our community.
 - I want to assure you that you can still receive any services you are eligible for here at my agency; however
 - I will not be able to collaborate directly with other agencies in the community to see if you are also eligible for services that they may be able to offer you.
- Also, you would not be on our communities ‘By Name List’, which is the only way to be referred to a housing program (Rapid Re-Housing, Permanent Supportive Housing, etc.) when they have an opening.
 - Housing programs in our community can only accept clients into their program through a referral from the ‘By Name List’

Once you have explained this to the client, ask them if they would like you to:

- Keep fully sharing their HMIS information with other collaborating agencies
- If they do not wish to fully share their HMIS information, review the ‘*HMIS Client Data Sharing Opt-Out Form*’ with them & have them sign it
 - Client must fill out and sign the ‘HMIS Client Data Sharing Opt-Out Form’
 - End User, Partner Agencies HMIS PoC, must then follow the instructions outlined in the ‘How To Restrict Client Records in HMIS’ guide

Appendix B: MD BoS HMIS P&P Change History

Version #	Date Final	Revisions
V1	9/7/20	Original version implemented
	7/10/25	<p>Add'l details clarifying HMIS policies & related procedures were added by including several new sections (with sub-sections). New sections include:</p> <ul style="list-style-type: none">• HMIS Governance• HMIS Organization & Management• Requirement of Participating in MD BoS HMIS• HMIS Training• Violation of HMIS Policies