Homeless Management Information System (HMIS)

**Policies and Procedures Manual**

**Developed by:** HMIS Lead Agency, MaineHousing

**Approved by:** MCoC Board & HMIS Data Committee (***3/7/2024***)

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In 2004, the Department of Housing and Urban Development (HUD) put forth rules regarding requirements for recipients of HUD related funding and other providers of services for the homeless to collect electronic data on their homeless clients through the Homeless Management Information Systems (HMIS). The State of Maine Homeless Management Information System (Maine HMIS) is a collaborative effort between MaineHousing, the dedicated lead agency, and the Maine Continuum of Care (MCoC). The MCoC has an ongoing role in ensuring the success of Maine’s HMIS by giving input into HMIS policy decisions within the parameters established by HUD.

## About This Manual

This manual contains information and procedures related to the Maine HMIS. The purpose of this document is to provide for uniform technical requirements of HMIS, for proper collection of data and maintenance of the database, and to ensure the confidentiality of the information in the database.

The importance of the integrity and security of HMIS cannot be overstated. Given such importance, it is equally important that HMIS is administered and operated under high standards of data quality and security. To strive to meet these objectives, the HMIS Lead has adopted policies and procedures for the operation of its HMIS. These policies and procedures must not only meet HUD standards, but policies and procedures must meet applicable state or local governmental requirements.

In addition to the Policies and Procedures listed here, all Maine HMIS Participating Agencies must make themselves knowledgeable of, and adhere to, all of the requirements and directives outlined in the following documents, if applicable to their agency:

* The Agency Participation Agreement
* HMIS/Community Services User Policy, Responsibilities Statement, and Code of Ethics (HMIS New User Form)
* The Maine HMIS Governance Charter
* The Maine HMIS Data Quality Plan and Best Practices Guide
* The [HUD HMIS Data Standards Manual](https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2024.pdf)
* [The HMIS Data Dictionary](https://files.hudexchange.info/resources/documents/HMIS-Data-Dictionary-2024.pdf) \*Program specific manuals can be found on the HUD exchange
* [2004 HMIS Data and Technical Standards Final Notice](https://www.govinfo.gov/content/pkg/FR-2004-07-30/pdf/04-17097.pdf)

Additional resources and information pertaining to Maine HMIS, and the above mentioned documents, can be found at <https://mainehmis.org>.

**Maine Continuum of Care (MCoC)**A CoC is a group composed of representatives from organizations including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, participating agency districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve veterans, and homeless and formerly homeless persons organized to carry out the responsibilities of a Continuum of Care established under 24 CFR part 578.

## Roles & Responsibilities

The Maine Continuum of Care (MCoC) is responsible for ensuring that the HMIS for the MCoC is operated in accordance with any current regulations and applicable federal, state, and local laws and ordinances.

CoCs can apply to HUD for McKinney-Vento funding. Local agencies wishing to access these funds must do so through the MCoC’s application for funding. HUD requires that every CoC work together to implement a shared data system designed to provide an un-duplicated count of homeless individuals, provide information on the number of people who are homeless, related demographics, and their needs over time. In Maine, this work is accomplished by the MCoC. For additional information and detail please refer to [https://www.mainehomelessplanning.org/.](https://www.mainehomelessplanning.org/.%20) This site assists with the year round planning process for the MCoC, the Point-in-Time (PIT) Count, System Performance Measures, and other collaborative statewide initiatives.

***The MCoC must be in compliance with the 2004 HMIS Data and Technical Standards Final Notice***

***The MCoC must also be in compliance with all key responsibilities detailed in the Maine HMIS Governance Charter.***

**MCoC HMIS Data Committee**

The MCoC HMIS Data Committee (Data Committee) is comprised of Participating Agencies, and the Lead Agency. The Data Committee reviews data analysis, systems mapping, the PIT, and other data-related issues and topics within the MCoC. The Data Committee also oversees the quality of the data that is put into HMIS and is responsible for developing and implementing an ongoing data quality plan.

***The HMIS Data Committee must be in compliance with the responsibilities detailed in the Maine HMIS Governance Charter.***

**Lead Agency**

The HMIS Lead is the entity designated by the MCoC to operate the Continuum’s HMIS on its behalf.

HUD requires that every CoC work together to implement a shared data system designed to provide an un-duplicated count of homeless individuals, information on the number of people who are homeless, related demographics, and their needs over time. The HMIS Lead works with the Participating Agencies to meet this goal.

MaineHousing is designated by the MCoC as the Maine HMIS Lead Agency (Lead Agency). In Maine, the implementation of an HMIS system is part of a larger strategic vision which allows agencies to share information for the purpose of better serving the needs of people who are homeless. The HMIS database is designed to protect client confidentiality while at the same time bring together the agencies and people who can provide assistance.

**Key Lead Agency Responsibilities:**

* Ensure system is available for use 24 hours a day, 7 days a week except when down time is required for system upgrades and maintenance or unexpected system outages;
* Respond to unexpected outages as quickly as possible and quickly communicate the status with users;
* Ensure HMIS dedicated funding is used for the intended purpose and is in compliance with all Federal, State and contract regulations;
* Obtain and retain necessary provider and user agreements;
* Ensure confidentiality, privacy, and security;
* Administer ongoing HMIS training;
* Run and submit required Federal reports;
* Hire and staff the HMIS Team who serve as subject matter experts for the HMIS application and its appropriate use;
* Oversee the Maine HMIS implementation;
* Review data quality for the MCoC and all MCoC programs;
* Provide expertise and information to the Maine HMIS Data Committee;
* Interface with providers on data quality issues and assist in troubleshooting to correct data discrepancies;
* Ensure that all applicable providers and corresponding data are included in relevant reports; and
* Provide expertise at and attend HMIS-related meetings.

***The HMIS Lead Agency must be in compliance with the 2004 HMIS Data and Technical Standards Final Notice***

***The HMIS Lead Agency will also:***

(a) Ensure the operation of and consistent participation by recipients of funds from federal partners requiring participation in the HMIS;

(b) Develop written HMIS policies and procedures;

(c) Execute a written HMIS Participation Agreement with each Participating Agency;

(d) Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Continuum of Care’s geographic area, as directed by the Continuum, and, if selected for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved activities;

(e) Monitor and enforce compliance by all Participating Agencies;

(f) Have a data quality plan developed in coordination with the Continuum of Care;

(g) Develop a privacy notice and release of information addressing data use, privacy, and purpose;

(h) Require the HMIS vendor and the software to comply with HMIS standards issued by HUD.

**HMIS Lead Agency Roles**

***Director of Homeless Initiatives & Homeless Response System Manager***

Both the Director and Homeless Response System Manager are responsible for oversight of the Maine HMIS implementation as the Lead Agency. They provide project management and guidance of the annual HMIS grant application process, which requires interface with the MCoC including processes and procedures. They conduct HMIS grant planning, budgeting, and invoice approval activities; including the technical budget, narratives and consultation on the Annual Performance Report submission to HUD for each grant year. They also oversee and supervise the HMIS Team.

***HMIS Program Specialist***

The HMIS Program Specialist facilitates the creation and maintenance of database reports, obtains statistics from homeless service providers, provides statistical and report analysis, ) for public, state and federal entities. Individual agencies, CoC, and State of Maine agency partners depend on the person in this role to provide accurate data so they generate reports that are necessary to ensure program funding is maintained or increased. The HMIS Program Specialist is also the main point of contact with the HMIS software vendor.

***HMIS Application Specialist***

The HMIS Application Specialist is responsible for day-to-day operation of the HMIS database system, ensuring project-level data quality according to the terms of the Participation Agreement and associated data quality plan. The HMIS Application Specialist provides ad hoc training and technical support to Participating Agencies. In addition, the Application Specialist facilitates submission of the Point In Time Count (PIT) and Longitudinal Systems Analysis (LSA).

***HMIS Training and Support Specialist***

The HMIS Training and Support Specialist acts as the main point of contact for all HMIS training and technical support. They coordinate, produce, and monitor HMIS End User training and End User accounts. They organize and participate in numerous projects regarding data collection and performance measurement.

**Participating Agency**

Participating Agencies are responsible for ensuring that HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data and the maintenance privacy, security, and confidentiality protections are in place for their individual programs and projects. A Participating Agency will include both an Agency Admin and End Users.

***The Participating Agency must be in compliance with the 2004 HMIS Data and Technical Standards Final Notice.***

**Agency Administrator**

Each Agency must designate at least one Agency Administrator (Agency Admin) who is the point person and specialist regarding the Maine HMIS for their agency. Each Agency is limited to two Agency Admins unless there is a demonstrated business need.

Some of the key roles of the Agency Admin are to:

* Run ESG CAPERs, CoC APRs, and the EVA Data Quality Tool. The EVA tool is required to be run quarterly, strongly recommended to run monthly, and upon the request of the HMIS Team and/or the CoCs to check client data;
* Complete the Agency Administrator training;
* Maintain an active status with regards to their End User license (log into Community Services Community Services at a minimum, on a monthly basis);
* Inform the HMIS Team of all program changes at least 5 business days prior to the change;
* Communicate and authorize personnel and security changes for End Users to the HMIS Team within 24 hours of a change; inactivating end user accounts when an End User leaves the agency or no longer needs HMIS access for any reason;
* **Ensure that End Users are using the correct HMIS-related forms and are following the most current Maine HMIS procedures and workflows;**
* Correct any data quality issues as soon as possible and notify the HMIS Team of findings and timelines for correction;
* Provide technical support to users by troubleshooting data errors and communicating with the HMIS Team on unresolved issues;
* Review and report any inventory and/or project changes as needed or needed. report any other necessary federal reporting information to HMIS, as required or when changes occur;
* Attend Maine HMIS required meetings, trainings, and conference calls; and
* Adhere to all of the policies and procedures outlined in the Maine HMIS Policies & Procedures.

**End User**

Community Services is the primary tool for Client intake and reporting. An End User has an active license to the Live Community Services Site, as well as the Community Services Training Site.

An End User is expected to do the following:

* Enter the most complete and accurate information about each Client and the Services they need, using the appropriate, required HMIS workflow within the required timeframes (reference HMIS Data Quality Plan;
* Only view, obtain, disclose, or use client information from the HMIS for a client who is actively seeking or receiving services from their agency or the agency for which they enter/view data
* Adhere to the data requirements set by HUD and other Federal Partners, the MCoC, and the HMIS Participating Agency;
* Successfully pass all assigned training courses with a score of 80 or higher;
* Maintain an active status with regards to their End User license (log into Community Services on a monthly basis, for more details, see User Account Inactivity Section);
* Meet and follow the expectations of the Agency Administrator(s); and
* Adhere to all policies and procedures outlined in the Maine HMIS Policies & Procedures.

**Mandated Participation**

## Maine HMIS Participation Policy

Agencies that are funded to provide homeless services by MaineHousing, State of Maine Department of Health and Human Services (DHHS), Office of Child and Family Services (OFCS), Runaway and Homeless Youth (RHY), Projects for Assistance in Transition from Homelessness (PATH), Supportive Services for Veteran Families (SSVF), Veterans Affairs Supportive Housing (VASH) and/or HUD in the State of Maine and who are required to enter data into HMIS must meet the minimum Maine HMIS participation standards as defined by this Policy and Procedures Manual. The proposed HUD Rule found at 24 CFR Parts 91, detailing HMIS Requirements states; “With respect to scope, this rule clarifies that all recipients of financial assistance under the Continuum of Care program, the Emergency Solutions Grant (ESG) program, the Rural Housing Stability Assistance (RHS) program, as well as HUD programs previously funded under the McKinney-Vento Act (the Supportive Housing Program (SHP), the Permanent Supportive Housing Program (tenant based voucher), and the Housing Choice Voucher Single Room Occupancy Moderate Rehabilitation program) are required to use HMIS to collect client- level data on persons served.” For VSPs*,* a comparable database is to be used. A comparable database must align with [HUD’s Comparable Database Manual](https://files.hudexchange.info/resources/documents/HMIS-Comparable-Database-Manual.pdf.).

**Voluntary Participation**

The MCoC cannot require non-funded providers to participate in the Maine HMIS, however, they do strongly encourage their participation. Full participation in the Maine HMIS ensures a comprehensive and accurate understanding of homelessness in the State of Maine. Non-funded agencies may voluntarily agree to participate but will need to meet minimum participation standards.

**Participating Agency Standards**

Participating Agencies are responsible for ensuring that a minimum set of data elements, referred to as the HUD Universal Data Elements (UDEs) as defined by the most current HUD HMIS Data Standards, are collected and/or verified from all clients at their initial program enrollment, or as soon as possible thereafter (with the exception of those serving domestic violence victims). Participating Agencies must report client-level detail in the *“*Required Response Categories” for the UDE’s that are shown in the most current HUD HMIS Data Standards*.* In some unique circumstances, a Participating Agency that is not mandated by funding source to collect all of the UDEs may be approved to enter an abbreviated set of data points.

A separate set of Common-Specific Data Elements for client level data are required for programs funded by State or Federal programs, including but not limited to SSVF, VASH, OCFS, DHHS, PATH, RHY, and ESHAP. These elements vary based on program and are defined by the most current HUD HMIS Data Standardsand are collected from all clients that are served by applicable HUD-funded programs.

Individual federal partner programs such as RHY, PATH, SSVF, require additional data elements. See the [HMIS Data Standards Data Dictionary](https://files.hudexchange.info/resources/documents/HMIS-Data-Dictionary-2024.pdf) for complete list.

These standards are already incorporated into the Maine HMIS, and can be accessed from the [Maine HMIS](https://mainehmis.org/) website. Data entry must be completed within a specific timeframe, depending on the type of program (see the Data Quality Plan and Best Practices Guide). The Maine HMIS uses all submitted data for analytic and administrative purposes, including the preparation of all federal and state reports.

Any request for custom fields must be reviewed and approved by the MCoC.

## Hardware, Connectivity and Computer Security

**Monitor**

A resolution of 1280 x 1024 or greater is recommended for 19” monitors. This will vary depending on the monitor size and whether or not it utilizes a widescreen format. Each monitor size has a recommended native resolution and this should be used whenever possible for the clearest display.

**Processor**

For Intel-based systems, a Core i5 or Core i7 processor is recommended.

For AMD-based systems, a Ryzen 5 or Ryzen 7 is recommended.

Each manufacturer follows a similar naming convention with 3 being on the slower end of the spectrum, and 7 being on the faster end. 3 < 5 < 7.

**Operating System**

Participating Agencies must be using a version of a currently supported operating system.

**Browser**

Community Services is designed to be compatible with the newest versions of Google Chrome, Mozilla Firefox, Microsoft Edge, and Apple Safari.

**Internet Connectivity**

Participating Programs must have Internet connectivity for each workstation accessing the HMIS. To optimize performance, all agencies are encouraged to secure a high-speed Internet connection offering at least 10 Mbps download speed. Bandwidth requirements are dependent on the number of devices sharing the internet connection as well as the content they are accessing. For example, high definition video streaming or video conferencing among many computers could require higher bandwidth.

**Computer Security**

All workstations accessing the HMIS must be protected by a Firewall. If the workstations are part of an Agency computer network, the Firewall may be installed at a point between the network and the Internet rather than at each workstation. Each workstation should have endpoint protection software in use to protect against viruses, spyware, and other malware. The software should be configured to automatically download and install critical software updates and virus definitions.

Windows 10 includes free, built-in security software called Microsoft Defender Antivirus that can be utilized. There are several paid and free solutions available from vendors including, but not limited to, McAfee, Symantec, TrendMicro, and Sophos.

**Agency Workstation Access Control**

Access to the HMIS will be allowed only from computers specifically identified by the Participating Agency’s Executive Director, or authorized designee, and the HMIS Agency Administrator. Laptop computers will require an additional security statement indicating that they will not be used for unauthorized purposes from unauthorized locations. Access to these workstations will be controlled through both physical security measures and a password. Each Agency’s HMIS Agency Administrator will determine the physical access controls appropriate for their organizational setting based on the HMIS security policies, standards and guidelines.

Each workstation, including laptops used off-site, must have appropriate and current firewall, and virus protection as specified above*.* Devices must only access secured, password- protected Wi-Fi with non-public access.

**Access to Maine HMIS Community Services from an Authorized Home Office**

MaineHousing and other participants in the Maine HMIS who have written and enforced work-at-home policies may authorize home office locations as authorized agency location for Maine HMIS Community Services use given the home office location is structured to assure that viewing of client information by unauthorized persons does not happen. For anyone who works with Community Services from a home office setting, this must be indicated and approved by a supervisor on the HMIS New User Agreement and a copy of the Agency’s telecommuting policy must be on file with the HMIS Lead Agency

**Eligible Users**

## Maine HMIS Training and User Requirements

Each Participating Agency shall authorize use of the HMIS only to users who need access to the system for data entry, editing of client records, viewing of client records, report writing, administration or other essential activity associated with carrying out Participant Agency responsibilities.

**Setting up a New HMIS End User**

It is the responsibility of the Agency Administrator to contact the HMIS Team when a new user starts and access to the HMIS and related training is required.

The agency will email an “HMIS User Agreement” form to the HMIS Help Desk at [HMIShelp@mainehousing.org](mailto:HMIShelp@mainehousing.org), requesting access to the HMIS/Community Services. The Help Desk will acknowledge receiving the “HMIS User Agreement” that can be found here: <https://mainehmis.org/training>.

**New End User Training Requirements**

All Agency Admins and End Users will be trained, either in person, or using the online Learning Management System (LMS), Bridge. For each training course, End Users will be required to pass the associated quiz. When the Maine HMIS verifies the End User has passed the test (with a grade of 80% or higher), their HMIS account will be set up and the End User will receive a welcome email with further instructions to obtain their HMIS credentials so they can access Community Services. Additional training opportunities will be offered to all users as needs arise and standards change within the system.

The HMIS Lead Agency shall authorize use of the HMIS only to End Users who need access to the system for data entry, technical administration of the system, report writing, data analysis and report generation, back-up administration or other essential activity associated with carrying out HMIS responsibilities.

The HMIS Help Desk will assist in enrolling in Bridge. Bridge is the LMS the Maine HMIS uses for online new user and program specific trainings. All Bridge training courses are available at any time for users to review and refresh their knowledge.

**Agency Administrator Training**

After completing End User training, each new Agency Administrator must complete an additional Admin training session. This session will include how to configure and manage an Agency’s programs and users in the HMIS. Agency Administrators will participate in subsequent training sessions as designated by the Maine HMIS Lead Agency, such as running the APR, LSA, HIC, CAPER and/or other project reports.

**Reports Training**

Reports training for Agency Administrators and other interested users will be made available as needed. This training will include how to use existing canned reports in Community Services and also include opportunities for training on Business Objects SAP

The Maine HMIS Team strongly encourages Participating Agencies to run their own data quality reports and APR report monthly so that Participating Agencies can monitor their own data quality and become more effective in serving clients across the Continuum.

**Agency Admins & End User Requirements**

Prior to being trained and granted a username and password, users must sign the HMIS User Policy Agreement. This agreement acknowledges receipt of a copy of as well as a pledge to comply with the Agency’s Privacy Notice.

**Agency Admins and End Users must be aware of the sensitivity of client-level data and must take appropriate measures to prevent its unauthorized disclosure. Administrators and End Users are responsible for protecting institutional information to which they have access and for reporting security violations.**

Agency Admins and End Users must comply with all policies and standards described in the following documents:

* The Agency Participation Agreement
* User Policy and Agreement
* The Maine HMIS Governance Charter
* The Maine HMIS Data Quality Plan and Best Practices Guide
* HUD HMIS Data Standards Manual

**Users are accountable for their actions and for any actions undertaken with their username and password.**

Once users have completed and passed training they will be given access to the HMIS database. If any user leaves the Agency or no longer needs access to the HMIS, the Agency Administrator is responsible for ***immediately notifying the HMIS Team******at*** [***HMIShelp@mainehousing.org***](mailto:HMIShelp@mainehousing.org)so that theuser’s access can be terminated.

Volunteers have the same user requirements as paid staff. They must have an individual user account, go through the same training, and have the same confidentiality and privacy documents signed and on file with the Participating Agency they are serving.

The Executive Director or authorized designee is responsible for ensuring that the Agency Admin and End Users understands and comply with all applicable HMIS policies and procedures.

**User Account Inactivity**

Users are expected to sign into Community Services at least monthly. Agency Administrators whose accounts have been inactive for more than 3 months may have their access restricted and may be required to complete the Agency Administrator training again prior to having their access restored. Any user whose account has been inactive for more than 6 months may have their access restricted and may be required to complete the New User and Confidentiality and Security training again prior to having their access restored.

**User Licenses**

Up to 2 user licenses per project are provided to Participant Agencies. Additional licenses may be provided if there is a demonstrated business need.

## Maine HMIS Implementation and Details

**New HMIS Agencies**

**New Agencies:**

The **Agency Participation Agreement** is the first form an agency will need to complete if they wish to participate in the Maine HMIS. This agreement covers the areas of: terms of use, training and technical assistance, confidentiality, security, and access to data. This agreement should be signed by an official who is authorized to enter into contractual agreements on the agency’s behalf.

After the agency has agreed to participate in Maine HMIS, they will need to schedule a meeting with the HMIS Team to discuss initial project set up procedures, determine new user and training needs, and address other questions/clarifications as needed.

**Coordinated Entry Access Points:**

Agencies who are designated as an Access Point for the Maine Continuum of Care Coordinated Entry System will also need to complete the **Agency Participation Agreement** and identify the users who will require access to HMIS in order to enter data for Coordinated Entry.

**Partnering/Sub-Contracts:**

Agencies entering data on behalf of another agency, or a Coordinated Entry Access point, must provide their signed memorandum of understanding with partnering/sub-contracted agencies to the HMIS Lead.

**Required Forms:**

The following forms will need to be completed and returned, as applicable:

**New Project Request Form** - This form tells the HMIS Lead about the type of shelter, housing and/or services etc. the agency will provide and who the point of contact should be for that project.

**HMIS Agency Administrator Designation Agreement** – This form is needed to identify the individual user that will be designated as an Agency Administrator and to assist the Maine HMIS administrators when configuring the agency in HMIS.

**HMIS/Community Services User Policy**, **Responsibilities Statement**, and **Code of Ethics (HMIS New User Agreement) –** This form must be signed by every user and outlines their responsibilities as well as the code of ethics they must follow as an HMIS user. The form also must be signed by the user’s supervisor.

**Bridge Training Request Form** –This form indicates to the HMIS Team which trainings users will need, which projects users will need access to in HMIS, and which users will need access to ShareFile.

**Agency Participation Agreements** must be signed and returned before a new agency or new access point can be created in HMIS. In addition, all other applicable forms and trainings must be completed before new users will be granted access to HMIS.

It is recommended that agencies retain a copy of this Maine HMIS Policies and Procedures Manual for reference.  Prior to setting up a new Participating Agency within the Maine HMIS database, the Maine HMIS Lead Agency will verify that the required documentation has been correctly executed and submitted or viewed on site, including:

* Agency Participation Agreement
* HMIS Agency Information Form
* New Project Request Form
* HMIS/Community Services User Policy, Responsibilities Statement, and Code of Ethics
* HMIS Agency Administrator Agreement

**Enforcement Mechanisms**

The Lead Agency will investigate all potential violations of any security protocols. Any Agency Admin or End User found to be in violation of security protocols will be sanctioned.

Sanctions may include, but are not limited to:

* A formal letter of reprimand to the MaineHousing Security Compliance Auditor, MCoC Board, and the Agency Executive Director;
* Suspension or Revocation of Agency Access if serious or repeated violation(s) of Maine HMIS Policies and Procedures occur by Agency Admins and/or End Users.

**Agency Information Security Protocol Requirements**

At a minimum, Participating Agencies must develop rules, protocols or procedures to address the following:

* Policies in the event of a data breach;
* Internal Agency procedures for complying with the HMIS confidentiality and security requirements and provisions of other HMIS client and Agency agreements;
* Posting a sign in the areas of client intake that explains generally the reasons; for collecting personal information;
* Appropriate assignment of user accounts;
* Preventing user account sharing;
* Protection of unattended workstations;
* Protection of physical access to workstations where employees are accessing the HMIS;
* Safe storage and protected access to hardcopy and digitally generated client records and reports with identifiable client information;
* Proper cleansing of equipment prior to transfer or disposal (i.e. disk shredding);
* Procedures for regularly auditing compliance with the Participating Agency’s information security protocol.

**Breach of Security**

Participating agencies acknowledge that ensuring the confidentiality, security, and privacy of any information accessed, used, or downloaded from HMIS by the agency is strictly the responsibility of the agency. The agency is obligated, once identified, to rectify any violations of the HMIS manual or HMIS user license agreement. In the event of a breach or suspected breach of the privacy or security of any information received from another agency via HMIS, or in the event of any unauthorized use or disclosure of any information received from another agency via HMIS, the agency will *immediately notify the HMIS Team at 207-626-4600* and the agency whose information was breached, and comply with any breach notification obligations the agency may have under the HIPAA breach notification rules and/or Maine’s Notice of Risk to Personal Data Act.

**NOTE: If an Agency is not in compliance with these protocols, they could risk losing funding.**

**User Access Levels**

All the HMIS users must be assigned a designated user access level that controls the level and type of access the user will have within the system. Each user will have access to client-level data based on their role at their agency and within the homeless response system.

**Client Notification Policies and Procedures**

## Maine HMIS Client Data Policies and Procedures

The Maine HMIS and the MCoC have prepared standard documents for the HMIS release of information: the Maine HMIS Authorization for Disclosure Information Form. All written consent forms must be stored in a client’s file for record keeping and auditing purposes. Forms are located on the HMIS website <https://maineHMIS.org/>

By participating in the Maine HMIS, agencies and users agree to high standards of confidentiality and to seek explicit authority and permission from clients for release of any identifiable client information.

The client has the right to have access to their own data.

A Release of Information (ROI) form must be signed by all clients before any Protected Personal Information (PPI) can be shared within HMIS.

The signed copy of the Agency Participation Agreement will have to be in place and on file at MaineHousing prior to sharing of information across agencies within the Maine HMIS.

All agencies participating in the Maine HMIS will be required to follow all current data security practices detailed in this document, and adhere to ethical data use standards, regardless of the location where agency users connect to the HMIS.

The client will have access to view, or keep a printed copy of, his or her own records contained in the HMIS.

The participating agencies and MaineHousing reserve the right, granted under federal and state statutes, to charge a fee to cover reasonable costs for the retrieval and printing of such client information.

A privacy notice shall be prominently displayed in the program offices where intake occurs. The content of this privacy notice shall be in accordance withthe HMIS Privacy Standards in: Federal Register / Vol. 69, No. 146 / Friday, July 30, 2004 and any other applicable standards.

**Client Refusals**

If a client does not want their data shared, the agency will ask the client to check the box next to “Do Not Disclose” on the Authorization to Disclose Information form, and the Agency will notify MaineHousing (by faxing the form to: 207-624-5768) who will ensure that the client’s information is unavailable to any other participating agency from the date of the client’s withdrawal of the authorization forward.

If a client does not want their data entered in to HMIS at all and is adamant after discussion, the agency should reach out to the HMIS Team for further instructions.

**Inactive Client Policy**

For the purposes of reporting, a client will be considered inactive if their last exit was to a non-permanent exit destination and occurred at least 90 days prior to any subsequent homeless program entry.

**Accountability for the Maine HMIS Policy**

Participating Agencies must establish a regular process of training users on the Maine HMIS policies and procedures outlined in this manual, regularly auditing that the policy is being followed by Agency staff (including employees, volunteers, affiliates, contractors and associates), and receiving and reviewing complaints about potential violations of the policy.

**HMIS Data Quality Policies and Procedures**

The Maine HMIS, in collaboration with the MCoC, has prepared the Maine HMIS Data Quality Plan and Best Practices Guide which outlines the data quality policies and procedures. This document is available at <https://mainehmis.org>  
**User Accounts**

## Maine HMIS Data Access Control Policies

Agency Administrators are responsible for managing user accounts for their Agency. They must follow the procedures documented in *Section 3,* for user account set-up including verification of eligibility, the appropriate training, and the establishment of appropriate user type. The assigned user type will determine each user’s individual access level to data, and Agency Administrators must regularly review user access privileges.

The Agency Administrator is responsible for inactivating users in the system. They should restrict the user’s access immediately upon that user’s departure from any position with access to the HMIS. Agency Administrators are required to notify the HMIS team immediately upon inactivation.

**User Passwords**

Each user will be assigned a unique identification code (User ID), preferably the first initial and last name of the user.

A temporary password will be automatically generated by the system when a new user is created. The Maine HMIS Lead Agency will communicate the system-generated password to the user. The user will be required to establish a new password upon their initial login. This password will need to be changed every 45 days. A password cannot be used again until another password has expired. Passwords should be between 8 and 50 characters long, contain at least two numbers, and should not be easily guessed or found in a dictionary. The password format is alphanumeric and is case-sensitive. Users are prohibited from sharing passwords, even with supervisors.

**Password Reset**

Users are able to reset their own passwords using the “Forgot Password” link on the Community Services logon page. The Agency Administrator and the Maine HMIS Lead Agency have the ability to temporarily reset a password. If an Agency Administrator needs to have his/her password set, they will need to email the HMIS Lead at [HMIShelp@mainehousing.org](mailto:HMIShelp@mainehousing.org).

**System Inactivity**

Users must log off from the HMIS application and their workstation if they leave their workstation. Also, HUD requires password-protected screen-savers on each workstation. If the user is logged onto a workstation and the period of inactivity on that workstation exceeds 30 minutes, the user will be logged off the system automatically.

**Unsuccessful Login**

If a user unsuccessfully attempts to log in three times, the User ID will be “locked out”, their access permission will be revoked. They will be unable to regain access until their User ID is reactivated by the Agency Administrator or Maine HMIS Lead Agency. They will need to email the HMIS Lead at [HMIShelp@mainehousing.org](mailto:HMIShelp@mainehousing.org).

The client has the right to view and have corrections made on their own data. In the event that the relationship between the Maine HMIS and a Participating Agency is terminated, Participating Agency access is terminated. If another program is assuming the program administration then the data migrates to the new program (fees may apply).

## Maine HMIS Data Ownership Policies

**Maine HMIS Data Use and Disclosure Policies and Procedures**

Each of the HMIS Participating Agencies must comply with use and disclosure standards in accordance with Maine HMIS’s policy documents and agreements.

**Data Release Criteria**

The HMIS client data will be released only in aggregate, for any purpose beyond those specified inthe Authorization to Disclose Information form. All released data must be anonymous, either by removal of all identifiers and/or all information that could be used to infer an individual or household identity.

**Maine HMIS Application Support**

## Maine HMIS Technical Support Policies and Procedures

As unanticipated technical support questions on the use of the HMIS application arise, users will follow these procedures to resolve those questions:

* Assistance is available during the normal Maine HMIS business hours: (8:00-5:00);
* Review the on-line help in Community Services and/or training materials on the HMIS website at <https://mainehmis.org/>;
* Direct the technical support question to the Agency Administrator;
* If the question is still unresolved, the Agency Administrator/user can direct the question to the Maine HMIS Team by sending an email to [HMIShelp@mainehousing.org](file:///C:\Users\acastner\AppData\Roaming\Microsoft\Word\HMIShelp@mainehousing.org);
* After the normal Maine HMIS business hours:
* Review the on-line help in Community Services, training materials on the HMIS website, <https://mainehmis.org/>, Bridge at <https://mainehmis-mainehousing.bridgeapp.com>, and/or the HUD Exchange;
* If the question can wait to be addressed during the following business day, wait and follow the normal business hours procedure outlined above; and
* If the question cannot wait, direct the technical support question to the Agency Administrator, if available.

**Maine HMIS System Availability Policies**

The Maine HMIS Community Services portal will be available to participating agencies 24 hours a day, 7 days a week. In the case there is a planned outage or issues impacting availability, users will be notified via email.

Every Wednesday from 10:00PM-11:00PM Eastern (EST) time, Community Services is unavailable because WellSky is performing necessary backup and maintenance of the HMIS database when as few people as possible need access to the system. However, when the Maine HMIS receives notice of a planned interruption of service for other reasons or for an abnormal amount of time, the HMIS Lead Agency will notify Agency Administrators and End-Users via email. If there is an unplanned interruption to service, the Maine HMIS System Administrator will communicate with WellSky, and Agency Administrators will be notified of any information regarding the interruption as it is made available.

**Standards for a Comparable Database**

Victim Service Providers should be in compliance with [HUD’s Comparable Database Manual](https://files.hudexchange.info/resources/documents/HMIS-Comparable-Database-Manual.pdf).

If you have any questions about policies and procedures, please contact the HMIS Lead or the MCoC HMIS Data Committee.

Acronyms

AHAR - Annual Homeless Assessment Report

APR - Annual Performance Report

BRAP - Bridging Rental Assistance Program

CAPER - Consolidated Annual Performance and Evaluation Report

CDBG - Community Development Block Grant

CES - Coordinated Entry System

CHO - Contributing HMIS Organization

CoC - Continuum of Care

DHHS - Department of Health & Human Services

DOC - Department of Corrections

EDA - Enter Data As

ES - Emergency Shelter

ESG - Emergency Solutions Grant

ESHAP - Emergency Shelter & Housing Assistance Program

FYSB - Family Youth Services Bureau

GA - General Assistance

GPD - Grant & Per Diem Program

HCV - Housing Choice Voucher

HDX - HUD Data Exchange

HEARTH Act - Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009

HHS - U.S. Department of Health and Human Services

HIC - Housing Inventory Count

HIPAA - Health Insurance Portability and Accountability Act

HMIS - Homeless Management Information System

HOPWA - Housing Opportunities for Persons with AIDS Grant

HTS - Home to Stay Program

HUD - Department of Housing and Urban Development

LMS - Learning Management System

LSA - Longitudinal System Analysis

MCEDV - Maine Coalition to End Domestic Violence

ME HVAC - Maine Homeless Veterans Action Committee

NAEH - National Alliance to End Homelessness

NHSDC - National Human Services Data Consortium

NOFA - Notice of Funding Availability

PATH - Projects for Assistance in Transition from Homelessness

PDX - PATH Data Exchange

PII - Protected Identifying Information

PIT - Point-in-Time

PPI - Personal Protected Information

PSDE - Program-Specific Data Elements

PSH - Permanent Supportive Housing

RHY - Runaway & Homeless Youth

ROI - Release of Information

RRH - Rapid Re-Housing

SAMHSA - Substance Abuse and Mental Health Services Administration

SH - Safe Haven

SHC - Statewide Homeless Council

SHP - Supportive Housing Program

SPC - Shelter Plus Care

SSVF - Supportive Services for Veteran Families

STEP - Stability Through Engagement Program

SUD - Substance Use Disorder

TBRA - Tenant Based Rental Assistance

TH - Transitional Housing

UDE - Universal Data Elements

USICH - United States Interagency Council on Homelessness

VASH - Veterans Affairs Supportive Housing

VAWA - Violence Against Women Act

YHDP Youth Homeless Demonstration Program