



**BREVARD HOMELESS
COALITION**

***Homeless Management Information System
(HMIS) Policies & Procedures***

**Updated
May 2023**

Table of Contents

Introduction 3

1.0 Governing Principles 4

2.0 Funding 6

3.0 HMIS Lead Agency Roles and Responsibilities 6

3.1 HMIS Lead Agency Annual HMIS Submittals 7

4.0 Partner Agency Roles and Responsibilities 8

 4.1 Partner Agency Executive Director Responsibilities 9

 4.2 Partner Agency Staff/End User Responsibilities 9

 4.3 Partner Agency Client Confidentiality/Privacy Policy 9

 4.4 Compliance with HUD Data Standards 10

 4.5 Adherence to the System Performance & HMIS Data Quality Monitoring Plan 11

 4.6 Consent and Confidentiality of Client Data 11

 4.7 User Authorization & Passwords 12

 4.8 Workstation Security Assessment and Policies 13

 4.9 Request New User ID 13

 4.10 Change User Access 13

 4.11 Voluntary Deactivation of User Access 13

 4.12 Compliance Failure 13

 4.13 Reset Password 14

 4.14 HIPAA 14

5.1 HMIS Release of Information (ROI) Statement 14

6.1 Vendor Software Selection Procedure 15

Glossary 16

Document History 18

Introduction

This document provides the framework for policies, procedures, and operations of the Brevard Continuum of Care (CoC) Homeless Management Information System (HMIS) project. Governing Principles establish the basis for all policy statements and subsequent decisions. Operating Procedures provide specific policies and steps necessary to ensure data security and awareness and HIPAA compliance in:

- 1) Project Participation
- 2) User Authorization and Passwords
- 3) Collection and Entry of Client Data
- 4) Release and Disclosure of Client Data
- 5) Workstation Security
- 6) Training
- 7) Technical Support
- 8) HUD Guidance and Mandates

Other Obligations and Agreements discuss external relationships required for the continuation of this project. As the Lead Agency for the Brevard CoC, the Brevard Homeless Coalition (BHC) provides management and oversight of HMIS.

Background

HMIS is the data management system designated by a local CoC to comply with the requirements of [CoC Program Interim Rule 24 CFR 578](#). It is a locally implemented data system used to record and analyze client, service, and housing data for individuals and families who are homeless or at risk of homelessness.

The HMIS is administered by the U.S. Department of Housing and Urban Development (HUD) through the Office of Special Needs Assistance Programs (SNAPS) as its comprehensive data response to the congressional mandate to report annually on national homelessness. It is used by all projects that target services to persons experiencing homelessness within SNAPS and the office of HIV-AIDS Housing. It is also used by other federal partners from the U.S. Department of Health and Human Services (HHS) and the U.S. Department of Veterans Affairs and their respective programs to measure project performance and participate in benchmarking of the national effort to end homelessness.

HMIS data paints the picture of homelessness in our community, the performance of the local homeless response system, and the effectiveness of programs targeted towards preventing and ending homelessness. Quality data entry and management is imperative as poor data quality can lead to inaccurate conclusions about homelessness in our community and how the system is functioning. HMIS data is utilized in making informed decisions, on local, state, and federal levels,

relating to funding priorities and allocations, homeless crisis response strategies, policies, programming, and program services. While the CoC retains ultimate authority and responsibility for the CoC's HMIS, the HMIS Lead Agency, the BHC, is generally responsible for the administration, management, and operation of the HMIS, in addition to providing end user training and meeting reporting requirements for funders.

This document outlines the general policies, procedures, guidelines, and standards intended to govern the Brevard CoC HMIS. As a condition of HMIS participation, Participating Agencies are required to adhere to all policies, procedures, MOUs, HMIS Participation Agreements and all current HUD Data Standards.

The BHC reserves the right to grant exceptions to any policy and procedure contained within to include but not limited to:

- HUD changes/updates in operating procedures, grant management and housing programs.
- CoC and public policy decisions requiring immediate consideration.

1.0 Governing Principles

Described below are the overall governing principles upon which all decisions pertaining to HMIS are based. Participants are expected to adhere to these principles.

Person-Centered Approach

A person-centered approach is at the core of the HMIS policies and procedures. These policies and procedures align with the [FY2024 HMIS Data Standards](#) Manual. The BHC will engage in meaningful and shared decision-making with individuals who have experienced or are currently experiencing homelessness in review of HMIS, as well as those individuals who are overrepresented amongst individuals within our homeless system of care. Data collection, data-informed processes, and reporting shall always be approached with empathy toward the individual(s) experiencing homelessness.

HMIS Participation

Participation in HMIS facilitates client case management for homeless individuals and families, and those at risk of homelessness in Brevard County. In an effort to maintain focus on the primary mission of homelessness, organizations not providing direct housing, healthcare, and other supportive services to homeless individuals and families are not permitted participation in or access to the HMIS database.

Organizations providing these services directly to homeless individuals and families are strongly encouraged to participate in HMIS thereby contributing to a CoC-level data repository.

Confidentiality

The rights and privileges of clients are crucial to the success of HMIS. These policies will ensure clients' privacy without impacting the delivery of services, which is the primary focus of agency programs participating in this project. Policies regarding client data are founded on the premise that a client owns

their personal information and provide the necessary safeguards to protect client, agency, and policy level interests. Collection, access, and disclosure of client data through HMIS will only be permitted by the procedures set forth in this document.

Data Integrity

Client data is the most valuable and sensitive asset of HMIS. These policies seek to ensure that client data is collected and entered into HMIS per HUD best practice protocols, and adherence to the System Performance & Homeless Management Information System (HMIS) Data Quality Monitoring Plan.

System Availability

The HMIS System Administrator is generally responsible for six (6) basic administrative roles related to the system operations and data including but not limited to: HMIS project management; managing the technical aspects of the day-to-day operations by working directly with the end users and software vendor; training end users; providing help desk support by receiving, triaging and resolving technical issues; provide data analysis and reporting; and communicating information to the CoC general membership and other related parties.

Compliance

Violation of the policies and procedures set forth in this document may have serious consequences. Any deliberate or unintentional action resulting in a breach of client confidentiality or loss of data integrity will result in the withdrawal of system access for the offending participating agency

Client Data Records

No participating HMIS agency may sell, allow access, upload, export and/or share client data records stored in the HMIS database with any outside organization, individual and/or any outside entity without the written approval of the HMIS Lead Agency.

2.0 Funding

HUD funds the management of the HMIS through the CoC HMIS grant program, designed to promote community-wide planning and strategic use of resources to address homelessness, to improve data collection, and system performance measurement. Should an increase in HMIS costs occur, the additional cost must be obtained from local match and/or usage/provider fees. Agencies participating in HMIS will be charged user license and technical assistance fees.

All Partner Agencies are required to pay HMIS fees in advance. The fees help to offset the user licensing and technical support charged by Bell Data, the Brevard CoC HMIS designated software vendor. Should the Partner Agency require additional user licenses, customization of the HMIS software and/or customized reports, the BHC will relay the requested changes to the vendor and obtain a fee schedule to complete the request. The BHC will then work with the Partner Agency to implement the changes. The flow process for requests therefore shall be Partner Agency ↔ BHC ↔ Bell Data Systems, Inc.

3.0 HMIS Lead Agency Roles and Responsibilities

The BHC is responsible for coordinating the following items on behalf of the Brevard COC:

- 1) **All software-related issues with the HMIS vendor.** This includes all communication with the vendor as well as submitting feature enhancement requests on behalf of Partner Agency.
- 2) **User Training.** HMIS Staff is responsible for End User training. This is to ensure continuity and consistency with training as well as ensuring the proper workflow for HMIS Partner Agencies is properly taught and followed.
- 3) **Creation of administrative and end user accounts in HMIS.**
- 4) **Set up of Partner Agency projects and associated supportive services in HMIS.**
- 5) **Technical Assistance.** HMIS staff is responsible for providing technical assistance to Partner Agencies and their End Users. Technical assistance will attempt to help the user solve specific problems within the HMIS software and does not include in-depth training, software customization, custom reporting and/or other support services.
- 6) **Data Quality.** Partner Agencies and HMIS staff are expected to work diligently on adhering to data quality standards, per the System Performance and HMIS Data Quality Monitoring Plan, in order to ensure compliance with all HUD mandates, guidance, and data standards. In addition, Partner Agencies and HMIS staff are expected to utilize vendor provided reports to ensure data is consistent, accurate and complete.
- 7) **Reporting System Performance Measures.** The BHC will provide training to Partner Agency staff on procedures to access and run reports on data entered into HMIS. Additionally, reports may be provided to local Community Planners, Statewide and National partners at regular intervals. The report content will be aggregate and de-identified with no protected private client information reported.
- 8) **HMIS Committee Structure.** The HMIS Committee Members shall be comprised of Brevard CoC members and HMIS Partner Agency representatives. It is required that one committee seat be mandated for the HMIS Lead Agency representative.

- 9) **HMIS Committee Meetings.** The HMIS Lead Agency will facilitate HMIS Committee meetings. A minimum of one annual HMIS Committee meeting is required to be held.

3.1 HMIS Lead Agency Annual HMIS Submittals

The BHC is responsible for the following annual submittals:

- 1) **Annual Homeless Assessment Report (AHAR).** The AHAR is a report submitted to the Department of Housing and Urban Development HUD, who presents the data in a report to the U.S. Congress detailing the extent and nature of Homelessness in the United States. It provides counts of the homeless population and describes their demographic characteristics and service use patterns. The AHAR is based primarily on data from HMIS in the United States. Our local participation in the AHAR is integral to the CoC grant renewal process and emphasizes the importance of data quality and data completeness.
- 2) **Housing Inventory Count (HIC).** The HIC is a mandated annual report submitted to HUD reporting all homeless emergency, transitional, safe haven, shelter plus care and permanent supportive housing beds throughout our CoC geographic area. The HIC is performed and filed by the CoCs Lead Agency staff.
- 3) **Homeless Point in Time (PIT) Count.** The PIT Count, a census of homeless individuals within our CoC, is also a federally mandated annual report. The CoC submits the data to local, State and Federal Government entities and other community planners. This data is used to estimate the number of homeless in our community and allocate funding based on those estimates.
- 4) **HMIS CoC Annual Performance Report (APR)/Consolidated Annual Performance and Evaluation Report (CAPER).** The BHC is responsible for the submissions of these reports through the Sage HMIS Reporting Repository.

4.0 Partner Agency Roles and Responsibilities

Any Agency applying to become a Partner Agency member of HMIS is required to meet the following minimum specifications:

1. Must be an active member in good standing of the Brevard CoC.
2. Provide a listing and description of all services provided to the homeless population in Brevard County.
3. Enter into the current HMIS Participation Agreement between the agency and the BHC, as the HMIS Lead Agency.
4. Pay in advance any HMIS-related fees prior to initiating any implementation. Start-up and annual participation fees are non-refundable and a requirement for continued participation. HMIS fees not paid by Partner Agency within 30 days of the invoice date will have HMIS database access de-activated until all outstanding invoices are paid in full.
5. Agencies not entering complete and accurate client level data for a period of 90 days or longer will not be considered as participating in HMIS. Agencies considered as non-participating will not be provided with letters of participation confirmation for grant and funding renewal applications.
6. Designate staff to perform data intake for HMIS and comply with all mandated security, privacy, and onboarding training courses.
7. Attend required meetings as designated for the purpose of updated training, policies, funding requirements, and user meetings.
8. Report to the HMIS Lead Administrator any data quality problems, data error/s, inaccuracies and any other issue/s that may affect the data quality of the HMIS database.

NOTE: Multiagency groups are not permitted to participate in the HMIS as a single entity sharing HMIS participation fees and user accounts. This configuration creates a conflict of interest, increases non-compensated resource expenditures for the HMIS Lead agency along with increased financial expense. This structure may also place client privacy at risk.

4.1 Partner Agency CEO/Executive Director Responsibilities

1. Designate Authorizing Agent for Participation Agreement.
2. Designation of HMIS Agency Administrator and Prime Contact.
3. Ensure Partner Agency compliance with Policies & Procedures.
4. Track and manage End User licenses.
5. Facilitate HUD mandated program data collection and reporting.
6. Compliance with Federal, State, Local and HUD Privacy Policy and Security requirements detailed in the currently published HUD HMIS Data Standards Manual.
7. Post client confidentiality/privacy policy in all client common areas, point of intake and ALL clients are offered a copy prior to providing any private information.
8. Review and update the client confidentiality/privacy policy at regular intervals and archive previous versions of the Partner Agency's policies.
9. Quality assurance shall be the ultimate responsibility of each Partner Agency's Executive Director.

4.2 Partner Agency Staff/End User Responsibilities

1. Safeguard client privacy through compliance with confidentiality privacy policies.
2. Data collection and reporting as specified by training and as outlined in this document.

4.3 Partner Agency Client Confidentiality/Privacy Policy

It is the responsibility of the Partner Agency administrative officers to maintain an active Privacy Policy and ensure all Partner Agency staff abide by the current Privacy Policy with due diligence. The agency's privacy policy must meet or exceed the current published privacy mandates, notices and guidance published by HUD. The Partner Agency is responsible for the following Privacy Policy protocols:

1. A written privacy policy has been presented and approved by one of the following authorities: Board of Directors, CEO, Executive Director, or Partner Agency Administrator.
2. The written privacy policy is reviewed at regular intervals, updated, and confirmed to meet current Federal, State, and local Privacy Laws.
3. All previous versions of the Partner Agency's Privacy Policies are archived.
4. The Partner Agency Privacy Policy is posted in client common areas.
5. The Partner Agency Privacy Policy is posted at point of client intake.
6. The Partner Agency Privacy Policy is posted on agency web sites.
7. The Partner Agency intake staff offer every client a copy of the agency's Privacy Policy before collecting any protected person information.
8. All Partner Agency staff will ensure all clients sign the HMIS Release of Information (ROI).
9. The Partner Agency will record within HMIS the ROI signing date.
10. The Partner Agency acknowledges that clients who refuse to sign the HMIS ROI will have NO PPI information entered into the HMIS database.



4.4 Compliance with HUD Data Standards

It is the responsibility of HMIS Partner Agency administrators and intake staff to ensure compliance with the HMIS Data Standards as outlined in the Final Notice in the HUD Federal Register, including the following:

1. Client demographics of all household members applying for services.
2. Universal Data Elements:
 - a. Name
 - b. Social Security Number
 - c. Date of Birth
 - d. Race
 - e. Ethnicity
 - f. Gender
 - g. Veteran Status
3. Universal Project Stay Elements:
 - a. Disabling Condition
 - b. Project Start Date
 - c. Project Exit Date
 - d. Destination
 - e. Relationship to the Head of Household
 - f. Client Location
 - g. Housing Move-In Date
 - h. Prior Living Situation
4. Program Specific Data Elements:
 - a. Income and Sources
 - b. Non-Cash Benefits
 - c. Health Insurance
 - d. Physical Disability
 - e. Developmental Disability
 - f. Chronic Health Condition
 - g. HIV/AIDS
 - h. Mental Health Disorder
 - i. Substance Use Disorder
 - j. Domestic Violence
 - k. Current Living Situation
 - l. Date of Engagement
 - m. Bed-Night Date
 - n. Coordinated Entry Assessment
 - o. Coordinated Entry Event

5. Record within HMIS all client level data within a reasonable time period of the client receiving supportive services, case management and/or program entry. A reasonable time period is expected to be three business days or less.

4.5 Adherence to the System Performance & HMIS Data Quality Monitoring Plan

1. Partner Agency is expected to fully adhere to the BHC/Brevard CoC Data and Performance Measures Committee System Performance & Homeless Management Information System (HMIS) Data Quality Monitoring Plan. The Data Quality Monitoring Plan sets forth:
 - a. Specific data quality benchmarks for timeliness, completeness, accuracy, and consistency;
 - b. Responsibilities of all parties within the Brevard CoC with request to data quality; and
 - c. Timeframe for monitoring data quality on a regular basis.

4.6 Consent and Confidentiality of Client Data

1. Client data will be gathered according to the policies, procedures, and confidentiality rules of each individual program.
2. Client data may only be entered into HMIS with client's authorization to do so (see Release of Information).
3. Client data will only be shared with Partner Agencies if the client consents, has signed the Client Consent form, and the signed Client Consent form is available on record.
4. Partner Agency and staff are not to communicate client private protected information via e-mail or any other public and/or semi-public media.
5. Hardcopy or electronic files will continue to be maintained according to individual program requirements, and according to the currently published HUD HMIS Data Standards Manual.
6. No individual client data may be imported or exported from an outside source without the client's written authorization.
7. The security and privacy of any authorized data imports or exports will be the sole responsibility of the Partner Agency performing the data import/export function.
8. The HMIS Lead shall archive or develop a plan to dispose of (or remove identifiers from) client data seven (7) years after the record/s was created or last changed.



4.7 User Authorization & Passwords

1. Partner Agency staff participating in HMIS shall commit to abide by the governing principles of HMIS and adhere to the terms and conditions of the Partner Agency User Agreement.
2. Partner Agency staff/end users are required to attend two Florida Department of Children and Families courses: 1) Security Awareness Training; and 2) HIPAA Information and Action training prior to being assigned a user account allowing access to the HMIS database.
3. Partner Agency staff/end users are required to attend HMIS 101 training provided by the BHC prior to being assigned a user account allowing access to the HMIS database.
4. Partner Agency staff is required to maintain a signed user security agreement on record with the HMIS Lead Agency.
5. The HMIS Lead Agency is required to maintain a digital or physical copy of all Partner Agency staff with permissions to access the HMIS database.
6. The Partner Agency must only request user access to HMIS for those staff members that require access to perform their job duties.
7. All users must have their own unique user ID and password. Partner Agency users are forbidden from sharing their user ID and password with other person or persons.
8. No staff member or person may have more than one HMIS access user account.
9. No person shall have access to multiple Partner Agencies without approval from the HMIS Lead Agency and each agency.
10. User-specified passwords should never be shared and should never be communicated in any format.
11. New user IDs must require password change on first use.
12. Passwords must consist of at least 8 characters contain 1 or more upper case letters, one or more lower case letters and 1 or more numeric values.
13. Passwords must be changed every 90 days. If they are not changed within that time period, they will expire, and the user account will be marked inactive.
14. User accounts with no login activity for 30 consecutive days will be considered dormant and be automatically inactivated by the HMIS Software. Users with dormant accounts are required to contact the HMIS Lead Administrator for account re-activation.
15. Passwords may only be reset by the HMIS System Administrator, designated HMIS staff and users themselves.
16. Partner Agency users may change their user account password at any time with no restriction on frequency.
17. Three consecutive unsuccessful attempts to login will disable the User ID until the account is reactivated by the HMIS Lead Administrator.

4.8 Workstation Security Assessment and Policies

1. Prior to requesting user access for any staff member, the Partner Agency Administrator will assess the operational security of the user's workspace.
Partner Agency Administrator will confirm that workstation has virus protection properly installed. At a minimum, any workstation accessing the HMIS central server shall have anti-virus software with current virus definitions (24 hours) and frequent full-system scans (weekly).
2. Partner Agency Administrator will confirm that workstation has and uses a hardware or software firewall.
3. The required internet connection must be one of: DSL or Cable Modem, at least 256 kbits.
4. Due to the secure internet connection required for HMIS access, it is required for all computer workstations accessing the HMIS using Microsoft Internet Explorer version 8 or later. Use of any other browser may cause display problems for the user and may breach client security.

4.9 Request New User ID

1. The Partner Agency Administrator is required to request from the HMIS Lead Agency in writing a User ID for staff requiring access to the HMIS by updating the Partner Agency Registration.
2. The prospective user must complete the New User Registration and Agreement and attend all training courses. The Agreement must be uploaded through the BHC user portal process.
3. The HMIS Lead agency instructor will co-sign the HMIS User agreement.
4. The HMIS Lead agency shall maintain the agreement electronically.

4.10 Change User Access

1. Users are encouraged to change their passwords frequently in adherence to the password guidelines and best practices.

4.11 Voluntary Deactivation of User Access

1. When any HMIS user leaves a Partner Agency or otherwise becomes inactive, the Agency Administrator or Prime Contact must alert the HMIS Lead Administrator as soon as possible for deactivation of the user's account.

4.12 Compliance Failure

1. Should a user be found to have breached the HMIS User Agreement, violated any Policies or Procedures, or breached confidentiality or security, the user's access to the HMIS database will be deactivated.
2. Users that are found to be accessing the HMIS from locations outside the Partner Agency facilities without prior approval shall have the user account deactivated.
3. Should a user divulge any client private protected information (PPI) for any reason, a determination by the HMIS Lead Agency will be made in terms of deactivating the user's account.



4.13 Reset Password

1. When a user has reason to believe that someone else has gained access to their password, the user must immediately notify the HMIS Lead Agency Administrator and the Partner Agency Administrator.

4.14 HIPAA

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements (as specified in those requirements) and these policies and procedures.

5.1 HMIS Release of Information (ROI) Statement

An ROI statement is required to gain client consent for any confidential data entered into HMIS. Below is the current ROI statement. This statement must be reviewed with each client and clients must sign the ROI before any data is inputted into HMIS. Partner Agencies may choose to expand upon this ROI but may not detract any items.

"I understand and acknowledge that this agency is a member of the HUD/Homeless Management Information System, hereafter known as "HUD/HMIS", and I consent to and authorize the collection of data and information maintained by this agency to "HUD/HMIS" and affiliated agencies, provided such agency is a party to the "HUD/HMIS" agency agreement under which the agency has specifically agreed to share information. These agencies include but are not necessarily limited to participants in the "HUD/HMIS" grant. The data, information and records gathered and prepared by the Agency and "HUD/HMIS" will be included in the database and may be utilized by "HUD/HMIS" and affiliated agencies to:

- a) provide individual case management;
- b) produce reports regarding utilization of services;
- c) track individual program outcomes;
- d) provide accountability for individuals and entities that provide funds for use in providing services in Brevard County;
- e) identify unfilled service needs and plan for the provision of new services;
- f) allocate resources among agencies engaged in the provision of services in Brevard County and
- g) be used for all other uses to be deemed appropriate by "HUD/HMIS"

I understand and acknowledge that my data and information may be used in aggregate data along with information of other individuals served by the Agency for the purposes described above. I understand and acknowledge that data, information, and records pertaining to the services provided to me by the Agency will only be disclosed to agencies, individuals, and entities other than "HUD/HMIS" only with my written authorization. I understand and acknowledge that the data pertaining to the services provided

to me may include medical/health information and other information the privacy of which may be protected by federal or Florida State laws and expressly consent to the release of such information in accordance with these protections.

I understand and acknowledge that I have the right to a) inspect, copy, and request amendment of all records maintained by the Agency related to the provision of services and to receive a paper copy of this form; and b) to file a grievance if I believe my privacy rights have been violated. This grievance must be submitted in writing to the agency's complaints manager and will be responded to in accordance with the Agency's Privacy Policies and Procedures. I understand and acknowledge that I have been offered and received a copy of this agency's Privacy Policy. I understand and acknowledge that I have the right to opt out of having my data, information and records disclosed to "HUD/HMIS" and affiliated agencies by providing notice to the Agency and that I am entitled to services regardless of my decision. I further understand and acknowledge that I may revoke this consent at any time by providing written notice to the Agency."

6.1 Vendor Software Selection Procedure

Should the need arise in the future to consider changing to a different HMIS Software Vendor the following general guidance is recommended:

1. The HMIS Lead Agency will maintain oversight and guidance for contract negotiations and performing the vendor selection process.
2. The HMIS Lead Agency will form an HMIS software selection advisory committee comprised of members at a minimum representing the a.) The CoC Advisory Council b.) HMIS Lead Agency c) Partner Agency Administrator/Directors. d) HMIS End Users.
3. The HMIS Lead Agency at its discretion may choose to select or yield to another body for final vendor selection or any other part of the vendor selection process.
4. Only current Partner Agencies will be allowed direct involvement during the vendor selection process to include but limited to meeting participation, committee participation and any voting activity.
5. Members of the CoC Membership Body that are NOT actively participating in the HMIS and DO NOT have a current HMIS Participation Agreement signed and on file with the HMIS Lead Agency are NOT permitted to vote or make any decision functions involving the selection of the HMIS vendor.
6. Once the HMIS Vendor selection is completed it will be the responsibility of the HMIS Lead Agency to facilitate and perform the implementation of the new HMIS Vendor Software.

Glossary

Annual Homeless Assessment Report (AHAR): HUD's annual report to Congress on the nature and extent of homelessness nationwide.

Annual Performance Report (APR): A mandated reporting tool that specifically targets Partner Agencies managing HUD funded Supportive Housing Program (SHP) funds. HUD uses APR rack program progress, performance, and accomplishments. The APR is also utilized with HPRP Programs on an annual basis.

Client: A living individual about whom a Contributory HMIS Organization (CHO) collects or maintains protected personal information: (1) because the individual is receiving, has received, may receive, or has inquired about assistance from a CHO; or (2) in order to identify needs, or to plan or develop appropriate assistance within the CoC.

Continuum of Care (CoC): The primary decision-making entity defined in the funding application to HUD as the official body representing a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency.

CoC Program: A program identified by the CoC as part of its service system, whose primary purpose is to meet the specific needs of people who are experiencing a housing crisis.

Homeless Assistance Program: A program whose primary purpose is to meet the specific needs of people who are literally homeless (as defined in data element 3.11, Housing Status). Homeless assistance programs include outreach, emergency shelter, transitional housing, rapid re-housing, homeless prevention, permanent housing, and permanent supportive housing.

Homelessness Prevention Program: A program whose primary purpose is to meet the specific needs of people who are imminently losing their housing or at risk of losing their housing (as defined in data element 3.11, Housing Status.). Homeless prevention programs include those funded by HPRP and other homeless prevention programs identified by the CoC as part of its service system.

Contributory CoC Program: A homeless assistance program or homelessness prevention program that contributes Protected Personal Information (PPI) or other client level data to an HMIS.

Contributory Non-CoC Program: A program that is neither a homeless assistance program nor a homelessness prevention program that contributes PPI or other client-level data to an HMIS.

Contributory HMIS Organization (CHO): An organization that operates a contributory homeless assistance program or homelessness prevention program or contributory non-homeless assistance program.

Data Recipient: A person who obtains PPI from an HMIS Lead Agency or from a CHO for research or other purposes not directly related to the operation of the HMIS, CoC, HMIS Lead Agency, or CHO.

End User (or User): An employee, volunteer, affiliate, associate, and any other individual acting on behalf of a CHO or HMIS Lead Agency who uses or enters data in the HMIS or another administrative database from which data are periodically uploaded to the HMIS. **Homeless Management Information System (HMIS):** The information system designated by a CoC to process Protected Personal Information (PPI) and other data in order to create an unduplicated accounting of homelessness within the CoC. An HMIS may provide other functions beyond unduplicated accounting.

HMIS Lead Agency: An organization designated by a CoC to operate the CoC's HMIS on its behalf.

HMIS Participating Bed: For any residential homeless program, a bed is considered a “participating HMIS bed” if the program makes a reasonable effort to record all universal data elements on all clients served in that bed and discloses that information through agreed upon means to the HMIS Lead Agency at least once annually.

HMIS Software Solution Provider: An organization that sells, licenses, donates, builds, or otherwise supplies the HMIS user interface, application functionality and database.

HMIS Vendor: A contractor who is paid to provide services for the operation of a CoC’s HMIS. An HMIS vendor includes an HMIS software solution provider, web server host, and data warehouse provider, as well as a provider of other contracted information technology or support. **Non-Contributory CoC Program:** A CoC Program that does not contribute PPI or other client-level data to an HMIS.

Participating CoC Program: A Contributory CoC Program that makes reasonable efforts to record all the universal data elements and all other required data elements as determined by HUD funding requirements on all clients served and discloses these data elements through agreed upon means to the HMIS Lead Agency at least once annually.

Protected Personal Information (PPI): Information about a client: (1) whose identity is apparent from the information or can reasonably be ascertained from the information; or (2) whose identity can, taking into account any methods reasonably likely to be used, be learned by linking the information with other available information or by otherwise manipulating the information.

Processing: An operation or set of operations performed on PPI, whether or not by automated means, including but not limited to collection, maintenance, use, disclosure, transmission, and destruction of the PPI.

Quarterly Performance Report (QPR): A reporting tool that HUD uses to track progress and accomplishments of HPRP funded programs on a quarterly basis. **Research:** A systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge.

Unduplicated Accounting of Homelessness: An unduplicated accounting of homelessness includes measuring the extent and nature of homelessness (including an unduplicated count of homeless persons), utilization of homelessness programs over time, and the effectiveness of homelessness programs.

Unduplicated Count of Homeless Persons: An enumeration of homeless persons where each person is counted only once during a defined period of time.

Victim Service Provider: A nonprofit or nongovernmental organization including rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating **violence, sexual assault, or stalking.**



Document History

April 2013	Update format of document. Add HMIS Universal Data Elements. Produce Glossary. Add rolls and responsibilities section.
February 2014	Add "Document History" section to the end of the document.
April 2014	Expand context to include Hearth Act guidance and mandates for HUD. Clarify other areas previously not addressed or adequately addressed. Update formatting. Correct grammar and typos
September 2016	Expand sections; Privacy Policy, Collection of and Entry of Client data. Add subsection that addresses agencies failure to pay HMIS Participation Fee's. Add item for HMIS APR submission responsibility. Correct minor typos and formatting.
September 2018	Text content and corrections. Corrected minor typos and grammar.
May 2020	Addition of BHC Logo
August 2022	Updated information to reflect Lead agency change from Brevard 211 to the Brevard Homeless Coalition
May 2023	Updated policies and procedures to reflect compliance with FY2024 HMIS Data Standards Manual and Brevard CoC System Performance & Homeless Management (HMIS) Data Quality Monitoring Plan