HMIS Policy Updates: 2018

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Topics We Will Cover

- **History & Process |** Previous policies and process for making updates

- **Policies in Context |** How the HMIS Policies fit with other documents

- **Key Changes |** Where? What? Why? What next?

- **Discussion |** Questions, Concerns, Comments

Submitting Questions

- Participants will be muted throughout the presentation

- Questions can be asked during the webinar via the "Questions" pane of GoToWebinar and will be addressed at the end

- If we cannot reply to all questions within the allotted time, ICA will follow up after the webinar
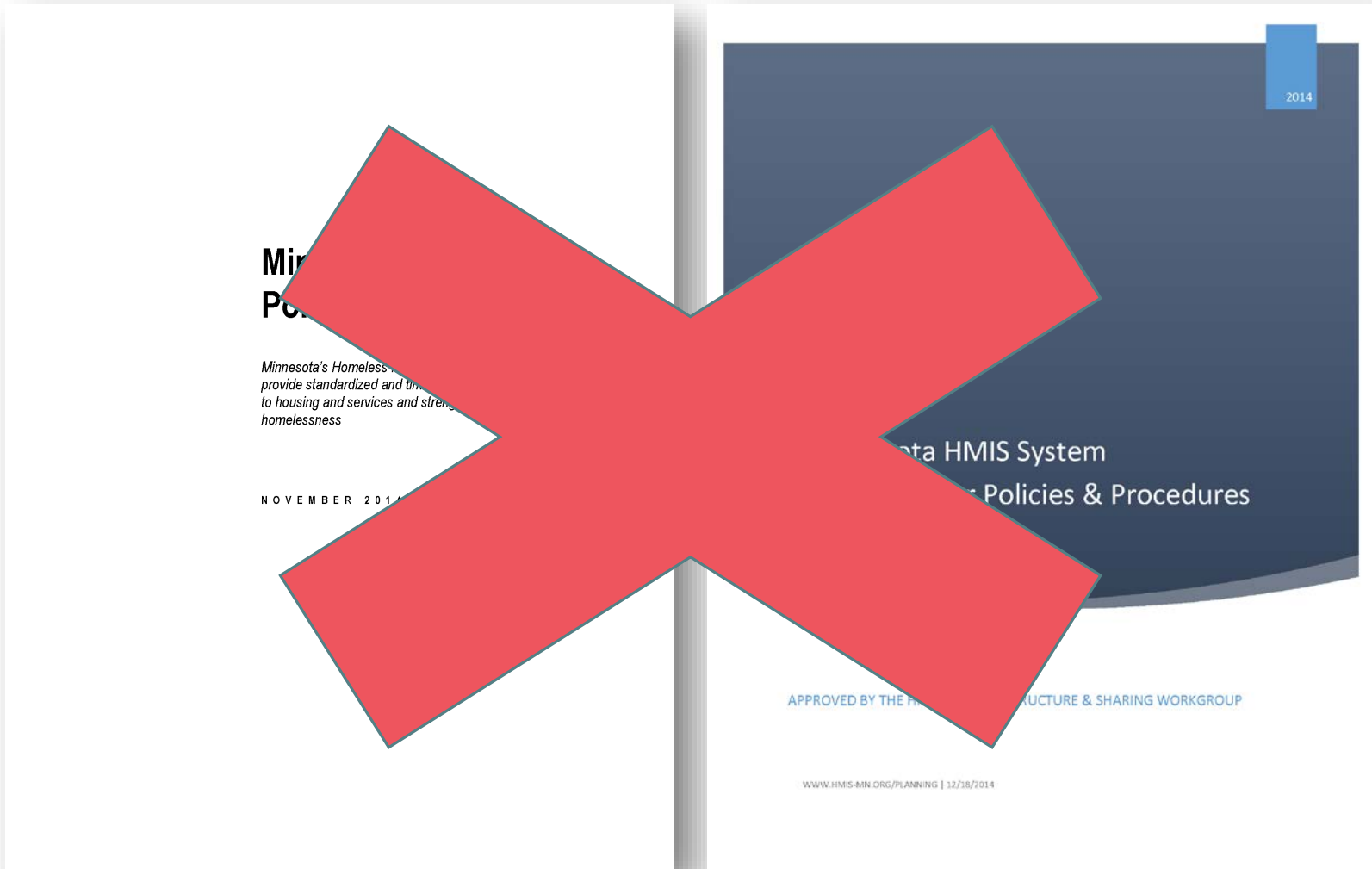
Other Housekeeping

- The webinar is being recorded and slides will be shared

- The policies are attached in the handouts pane of GoToWebinar

- Please raise your hand if at any point you can no longer hear me

History and Process

Institute for Community Alliances

History

Goals of Policy Review

- **Consolidation** – create a single, system-wide policy document

- **Simplicity** – policies, not procedures or "What is HMIS?" explainer

- **Practicality** – focus on finding solutions for known challenges

- **Reflect current practice** – reflect documents and practices currently in place

Policy Update Process

- **Drafting** – ICA and Jennifer Trombley, including review of policies from other ICA implementations

- **Policy and Prioritization Committee Review & Approval** – Several reviews, including input from the Implementation Committee, followed by a recommendation to the Board

- **Governing Board Review & Approval** – Reviewing key changes, followed by a formal vote by the Board to approve

- **Communication & Training** – Process starts today!

- **Annual updates** – Reviews will be conducted annually

Policies in Context

Prior to Updates

Operating Documents

- Agency Agreement
- Business Associates Agreement (for HIPAA-covered agencies)
- LSA Agreement
- HMIS Policies and Procedures
- HMIS System Administrator Policies and Procedures
- Posted Data Privacy Notice
- User Policy, Responsibility Statement and Code of Ethics *("User Policy")*

Documents for Client

- Release of Information

Visit hmismn.org/administrative-documents links to all administrative documents!

After Updates

Operating Documents

- Agency Agreement
- Business Associates Agreement (for HIPAA-covered agencies)
- LSA Agreement
- HMIS Policies and Procedures
- ~~HMIS System Administrator Policies and Procedures~~
- Posted Data Privacy Notice
- User Policy, Responsibility Statement and Code of Ethics *("User Policy")*

Documents for Client

- Release of Information

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Key Changes

Key Changes - Overview

- **Designated Agency HMIS Contact**

- **Training |** New User Training, Recertification Training, Security Training

- **Uploading Releases of Information**

- **Research Uses and Publication of Data**

- **Client Grievance Policy**

- **Data Quality |** Minimum Data Collection Standards and XML Imports

- **System Administration |** Local and Agency System Administrators

- **Other |** User Conflict of Interest, Coordinated Services Agreements

- **Violation of HMIS Policies**

Designated Agency HMIS Contact

- **Where |** Section 2.1, Page 8

- **What |** "The Partner Agency's Executive Director or their designee must select at least one person to act as the Designated Agency HMIS Contact."
  - Update ICA with project and user information in a timely manner
  - Understand data collection and reporting requirements
  - Ensure proper user access (unique licenses, training, user agreements)
  - Inform ICA of any policy or procedure violations

- **Why |** Establishing a clear point of contact for questions
  - User access must be terminated within 24 hours of departure
  - Project setup can be complex

- **What Next |** ICA will reach out to gather this information

New User Training – Timely Completion

- **Where |** Section 3.1, Page 10

- **What |** "…the user has 20 business days to complete the training series and all required assignments."

- **Why |** Users that take longer to complete training tend to forget content, have additional errors

- **What Next |** People currently in the midst of new user training in progress for 20+ business days will be asked to retake training

New User Training – Successful Completion

- **Where |** Section 3.1, Page 10

- **What |** "Lead Agency staff may use their discretion to require new users to repeat New User Training. If a new user fails to successfully complete their assignments after repeated attempts, <u>Lead Agency staff may</u> use their discretion to determine that the new user is not capable of accurate and complete data entry and may <u>refuse to issue the new user a Minnesota HMIS user license</u>."

- **Why |** Poor data quality costs Partner Agencies and ICA valuable time and can jeopardize available funding

- **What Next |** No action required of agencies at this time

New User Training as Remedial Training

- **Where |** Section 3.2, Page 10

- **What |** "If the Lead Agency determines that data entered by a current user does not meet minimum data quality standards, or if a user has not accessed the system within three months of completing New User Training, users may be required to repeat this training."

- **Why |** Poor data quality costs Partner Agencies and ICA valuable time and can jeopardize available funding

- **What Next |** No action required of agencies at this time

Annual Security Training

- **Where |** Section 3.2, Page 10

- **What |** "All users are required to attend annual security training provided by the Lead Agency to retain their user license."

- **Why |** Maintaining the integrity and security of the HMIS is critical to protecting client information

- **What Next |** Look out for more information later in 2018!

Recertification Training

- **Where |** Section 3.2, Page 10

- **What |** "At the discretion of the Lead Agency, 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. Users who do not complete recertification training in a timely fashion may have their licenses suspended until training has been completed."

- **Why |** Certain changes will require all users to be up to date in order to maintain data quality and security

- **What Next |** Look out for our upcoming recertification training on the Release of Information

Uploading Releases of Information

- **Where |** Section 5.2, Page 15

- **What |** "The Partner Agency that received the client's initial ROI form will scan and upload the signed copy of the form to the HMIS."

- **Why |** Uploading the signed document will help ensure appropriate data sharing

- **What Next |** We recommend that you begin uploading now; will be required after upcoming recertification training on the ROI

Publication of Partner Agency Data

- **Where |** Section 5.3, Page 16

- **What |** "If a report identifies one or more specific agencies or programs, agencies will be given a period of 15 business days to review and comment on the information as presented in the report. Agency and Continuum of Care review periods may be waived if prior approval is obtained by the Lead Agency or the Local System Administrator."

- **Why |** Agencies should be aware of reports that identify them specifically

- **What Next |** No action required of agencies at this time

Research Uses of Data

- **Where |** Section 5.3, Page 16

- **What |** "Data may be released to external stakeholders for research purposes by the Lead Agency, as approved by the HMIS Governing Board. <u>The HMIS Governing Board will approve or deny requests to release data based on the potential benefits and costs to clients, Partner Agencies, and other stakeholders</u>. If at all possible, the release of identified data will be avoided. If identified data is needed, the HMIS Governing Board will work with the Lead Agency to ensure that proper procedures and precautions are in place prior to releasing data."

- **Why |** Why did we make it?

- **What Next |** No action required of agencies at this time

Grievance Policy

- **Where |** Section 5.4, Page 17

- **What |** "If a client believes that their rights have been violated related to their personal or private data held in the HMIS, a written complaint may be filed…"
  - File with Partner Agency, escalate to ICA and Governing Board as needed
  - File directly to ICA if retaliation is feared; retaliation is prohibited

- **Why |** Client concerns need to be heard without fear of retribution

- **What Next |** Find the Grievance Form on the Administrative Documents page of the website so you can make it available to clients upon request

Minimum Data Collection Standards

- **Where |** Section 6.1, Page 18

- **What |** "All Partner Agencies are responsible for asking all clients a minimum set of questions, or data elements. These required data elements include: (1) the Universal Data Elements required federally and at the state level by the HMIS Governing Board; and (2) Program-Specific Data elements, which depend on the funder and may not be required at all if a program is not funded by a program that requires the use of the HMIS."

- **Why |** Intent to clarify that universal data elements apply to all agencies, regardless of whether they are funded or by whom

- **What Next |** No action required of agencies at this time

XML Imports

- **Where |** Section 6.3, Page 18

- **What |** "While HMIS databases are required to have the capacity to accept XML imports, the Lead Agency and the HMIS Governing Board reserve the right to not allow XML imports into Minnesota's HMIS."

- **Why |** Allowing XML imports may impact data integrity and increase the likelihood of duplication of client files in the system; Live data entry is also critical for Coordinated Entry

- **What Next |** No action required of agencies at this time

LSA Expanded Reporting Access Agreement

- **Where |** Section 8.3, Page 20

- **What |** The Local System Administrator (LSA) Expanded Reporting Access Agreement "grants the LSA full visibility to statewide HMIS information in the Advanced Reporting Tool ("ART") which is used to report on HMIS data. However, the agreement reaffirms that the LSA may only view data from their Continuum of Care as needed for legitimate business purposes."

- **Why |** Due to technical issues with a prior database restructure, LSAs were not able to see all data within their CoC; this creates a policy solution to that technical issue

- **What Next |** No action required of agencies at this time

Agency System Administration

- **Where |** Section 9, Page 22

- **What |** "Partner Agencies may elect to develop internal capacity for system administration. Partner Agency System Administrators are trained by the Lead Agency and granted system administration access at the sole discretion of the Lead Agency."

- **Why |** Some Partner Agencies already have internal system administration capacity; this section details their roles, responsibilities, and policies

- **What Next |** No action required of agencies at this time

User Conflict of Interest

- **Where |** Section 10.1, Page 23

- **What |** "Users who are also clients with files in the HMIS are prohibited from entering or editing information in their own file. All users are also prohibited from entering or editing information in files of immediate family members."

- **Why |** Preventing issues arising from conflict of interest

- **What Next |** Report any potential conflict of interest to your agency's Designated Agency HMIS Contact, once established.

Coordinated Services Agreements

- **Where |** Section 10.2, Page 23

- **What |** "Coordinated Services Agreements allow a specifically named HMIS user to enter client data as, or on behalf of, another specifically named Partner Agency and/or to report on behalf of a specifically named Partner Agency."

- **Why |** Coordinated Services Agreements are already in use; this codifies their use

- **What Next |** No action required of agencies at this time

Violation of HMIS Policies

- **Where |** Section 11, Page 24

- **What |** Establishes successive consequences for first, second, and third violations, along with a process to appeal to the Governing Board
  - The Partner Agency and Governing Board will be notified of all violations
  - ICA will provide training after each violation to ensure issues are addressed
  - First violation – license suspension for 30 days or until issue is remedied
  - Second violation – license suspension for minimum of 30 days
  - Third violation – Governing Board determines whether to terminate license

- **Why |** Recourse for violations should be clear and uniform

- **What Next |** Review this section in full and contact the helpdesk at mnhmis@icalliances.org with any follow-up questions

Recapping Next Steps

- Respond to upcoming ask for Designated Agency Contact information

- Complete the upcoming recertification training on the ROI

- Begin uploading signed ROI documents no later than the ROI training

- Find the Grievance Form on the Administrative Documents page of the website so you can make it available to clients upon request

- Review the full policy document and contact the helpdesk at mnhmis@icalliances.org with any follow-up questions!

Discussion

Stay in touch

HELPDESK: HMISMN@ICALLIANCES.ORG

ONLINE: HMISMN.ORG