

Minnesota HMIS System Administrator Policies & Procedures

APPROVED BY THE HMIS 2.0 DATA STRUCTURE & SHARING WORKGROUP

HMIS SYSTEM ADMINISTRATOR POLICIES & PROCEDURES

Contents

Purpose Statement.....2

Guiding Principles.....2

Key Terms and Acronyms2

Privacy Statement4

System Administration Policies4

 1. Local System Administrator Responsibilities4

 ❖ Obtain/Maintain LSA Training and Certification for LSA staff5

 ❖ Communication and Coordination.....5

 ❖ System Training5

 ❖ System Support, Maintenance, and Customer Service.....5

 ❖ Ensure System Compliance.....6

 2. State System Administrator Responsibilities6

 ❖ SSA/LSA Annual Plans6

 3. Additional System Administrator Policies.....7

Publication Policies.....7

 1. General Publication Policies7

 ❖ LSA Use and Access to HMIS Data7

 ❖ Confidentiality/Use of Identifiable Data8

 ❖ Continua of Care Obligations8

 ❖ Data Quality and Validation Process.....8

 ❖ Minimum Set of Qualifiers.....10

 2. Publication Policies for Public Uses10

 ❖ Policies Regarding Agency-Identified Information.....10

 ❖ Release Rules by Report Type.....10

 3. Publication Policies for Evaluation and Planning Uses.....12

 ❖ Evaluation and Planning Reports—Not for Public Distribution.....12

 ❖ Evaluation and Planning Reports—For Public Distribution.....12

 4. Publication Policies for funder reporting requirements12

 5. Summary of Publication Options13

CoC-Specific HMIS Policies13

Grievance Process13

HMIS SYSTEM ADMIN POLICIES & PROCEDURES

Purpose Statement

The purpose of this document is to clearly define the obligations and responsibilities of all parties as related to the formation and ongoing duties of the Local System Administrator (LSA) role, for Minnesota’s Homeless Management Information System (MN-HMIS). Note that policies regarding other aspects of the system are present in other documents, as detailed below.

Guiding Principles

Minnesota HMIS System Administrator Policies & Procedures were created based on the following guiding principles:

- Data Security/Privacy is protected.
- System Administrator policies will provide a platform for consistency across the state while allowing for local priorities and varying geographic needs, particularly unique differences between rural and urban Continuums.
- Tribal sovereignty is honored and accommodated.
- Administrative actions and decisions should be conducted through the lens of how the action will benefit clients.
- Service-providing agencies need to be informed and consulted when their data will be used in a manner that identifies their agency.
- Continuum of Care regions will be able to use data to inform and enhance local planning and reporting needs.
- Data will be used to guide and inform state, regional and local partners in efforts to end homelessness.
- Minnesota’s HMIS will be a collaborative partnership with different levels actively working together to share information, develop policies, and meet system goals.
- Be respectful and inclusive of all partners. We are all working towards the same goal—to end homelessness.

Key Terms and Acronyms

Term	Acronym (if used)	Brief Definition
Agency Administrator		Each agency that uses HMIS will have a lead administrator for their agency. This person will have administrative capabilities for their agency’s tree and will be responsible for communicating with SSA, LSA, and agency end users.
Annual Support Plan		An annual plan that will be developed by LSAs in each CoC region to identify system administration responsibilities between the SSA and LSA.
Annual Communication Plan		An annual plan that will be developed by LSAs to identify contact information and communication schedules and responsibilities between Agency Administrators, SSA and LSA.
Continuum of Care	CoC	Planning body charged by HUD with guiding the local response to homelessness.
Evaluation Plan		A plan that will be developed by CoCs to evaluate agency and system performance that is approved by the CoC Governing Board.
Funder		Any entity that requires agencies to enter data into HMIS. State agencies that fund homeless programs in HMIS are included as “funder”.
Homeless Management Information System	HMIS	Data systems that meet HUD requirements and are used throughout the nation to measure homelessness and the effectiveness of related service delivery

		systems. The HMIS is also the primary reporting tool for HUD homeless service grants as well as other public monies related to homelessness.
HMIS Advisory Task Force	HMIS-ATF	The governing body that sets HMIS policy and procedure, oversees grants and budgets, and plans for system use and changes.
HMIS Lead Agency		The entity for the Statewide HMIS that helps set policy and manage contracts, including with the Statewide System Admin for administration of the System.
Housing Inventory Chart	HIC	Annual count of all homeless programs and their units and beds.
Local System Administrator	LSA	The entity responsible for the regional administration of HMIS within each CoC region.
Minnesota’s Homeless Management Information System	MN-HMIS	Minnesota’s statewide HMIS.
Participating Agency		Any organization (employees, volunteers, and contractors) that records, uses or processes Protected Personal Information in HMIS
Point in Time Count	PIT	An annual count during the last week in January that is required for all CoCs. Every other year, that count also includes an “unsheltered” or street count.
Sharing		Sharing, as used in this document, refers to the sharing of data between agencies. It does not refer to basic entry into the HMIS or CoC or funder access to client level information for administration or reporting. Sharing data requires a signed client Release of Information.
Statewide System Administrator	SSA	The entity responsible for state-wide administration of MN-HMIS (currently Wilder Research).
Tribal Specific Information		This refers to data that identifies the specific tribal membership of a household. This includes data that is reported in CoCs where only one Tribe resides.
User		Any person that has access and license to participate in HMIS. This includes endusers, agency administrator, local system administrator, and state system administrator.
User Group		A workgroup of end users that will meet to consult and advise SSA and LSA regarding the administration of HMIS.

Key Agreements, Certifications, Licenses and Disclaimers

MN-HMIS utilizes the following documents and processes to ensure clients, agencies, end users, and administrators understand their rights and responsibilities for participating in the data system. Documents and processes are still in development in many cases and further documents around data sharing and governance will be added as they are developed. Only currently existing documents are listed. Other agreements, certifications, licenses, disclaimers not named in these policies may be created and used if approved by the HMIS Advisory Task Force and/or CoC.

Document	Acronym (if used)	Brief Definition
Informed Consent		The document used to gain permission from clients to collect their information and to indicate what parties will be able to see and use their data for administrative purposes.
Joint Governance Charter		Each CoC is an independent entity that participates in MN-HMIS. As such, there is a signed Joint Governance Charter that designates the use of the Minnesota’s State System Administrator and identifies the Statewide Lead Agency. The Charter supports the ability for multiple jurisdictions to participate on a single HMIS information system.
LSA Agency Agreement	LSA-AA	The Agreement signed by each Agency, LSA, and Continuum of Care Lead Agency that governs data use and system administration within the region.
HMIS Policies and Procedures		Refreshed annually and set the minimum standards for the all participants of MN-HMIS.

Release of Information	ROI	The document used to gain permission from clients to share data within the HMIS for the purposes of service coordination. Allows for the sharing between agencies.
State-wide Agency Agreement	SSA-AA	The Agreement between all participating agencies and the SSA (Wilder) that specifies the rights and responsibilities of SSA and participating agencies.
User Policy & Code of Ethics Statement		The participating agencies are required to have all User Agreements and Training Certifications on file as well as agency related Agency Agreements and documentation. The SSA keeps a file with Agency Agreements and documentation for each agency in a secure environment.

Privacy Statement

MN-HMIS is committed to make Minnesota’s HMIS safe for all types of programs, the clients whose information is recorded, and to maximize the opportunities to improve services through automation. **Toward that end:**

- Sharing is a planned activity guided by the client through MN-HMIS Release of Information.
- The MN-HMIS System runs in compliance with HIPAA, and all Federal and State laws and codes. All privacy procedures are designed to ensure that the broadest range of providers may participate in MN-HMIS.
- All those issued user access to the system (including system administrators) must successfully complete privacy training and sign a User Policy, Responsibility and Code of Ethics Statement, and agencies must sign an Agency Agreement. Taken together, these documents obligate participants to core privacy procedures.
- MN-HMIS will have separate policies on privacy and data sharing (as of 11/20/14, under development). All parties are obligated to adhere to the policies on privacy and data sharing.
- Existing contracts and agreements name the responsibility of all users of HMIS to follow data privacy principles. The SSA will have primary responsibility to monitor and audit data privacy in HMIS. LSAs will have secondary responsibility and will notify the SSA with any issues they identify. Further detail may be articulated in the Annual Support Plan between the LSA and SSA.

System Administration Policies

1. Local System Administrator Responsibilities

The Local System Administrator (LSA) is responsible for ensuring that all aspects of their regional HMIS project are appropriately maintained. Many LSA’s may not have the capacity to perform all responsibilities assigned to the LSA (outlined below). In addition, there are complex agencies that provide services in multiple CoC regions or the entire state—which could create confusion regarding which LSA they go to for system support, etc. For this reason, the SSA will work with LSAs to develop an Annual Support Plan to delineate responsibilities.

The SSA will provide structure and instructions for the LSA to use to manage their local system. LSAs will follow these processes, provide feedback where needed, and work collaboratively with the SSA and other LSAs to make sure we have consistent processes, improvements are made, and new ideas are shared so we are moving the processes towards their most ideal operations.

LSAs will decide each year which aspects of the following options they will perform locally. An Annual Support Plan will be created between the LSA and SSA to ensure that all tasks not performed locally will be assumed by the SSA. An Annual Communication Plan will also exist between the LSA, SSA, CoCs and agency administrators.

The Local System Administration responsibilities include the following:

❖ Obtain/Maintain LSA Training and Certification for LSA staff

- Demonstrate complete competence in Statewide required training in privacy, security and system operation (provider page, workflows and reports).
- Comply with Minnesota Statewide Privacy Protocols as specified in the Agency Agreements and the User Agreement Code of Ethics.

❖ Communication and Coordination

A primary responsibility of the LSA is to facilitate and maintain communication with all stakeholders of HMIS in their region including funders, SSA, agency admin, CoC, etc. The LSA will be responsible for creating an Annual Communication Plan between the LSA, SSA, CoCs and agency administrators which will include actions needed to perform duties such as the following:

- Attend all MN-HMIS System Administrator meetings/trainings.
- Facilitate local meetings that regularly review local HMIS policy and outcome/evaluation.
- Facilitate Continuum of Care HMIS Agency Administrator meetings.
- Inform SSA of system issues for coordination and resolution.
- Inform the community about HMIS.
- Represent/Cover HMIS at the Continuum of Care meetings.
- Collect contact and program information from Agency Administrators and communicate to State System Administrator

❖ System Training

The SSA provides the foundation of HMIS trainings. The LSA will enhance and supplement¹ trainings for Agency Administrator and end users (initial and refresher) on topics that may include:

- ServicePoint workflows and data entry processes.
- Privacy and Confidentiality materials.
- Advanced Reporting Tool (ART), etc.
- System Administrator Orientation
 - Provider Page Set-Up Training
 - Reports Training
 - Data Quality
 - Progress Reporting
 - Outcome Reporting

❖ System Support, Maintenance, and Customer Service

The LSA will ensure, in cooperation with the SSA, that on-going support is provided to all agencies using HMIS in their region. Responsibilities may include:

- Provide online, in-person, and by-phone technical support.
- Track all requests for technical assistance to determine adequacy and timeline of response.
- Regularly review log of requests for technical assistance to ensure consistent, effective and efficient service delivery.
- Review/Provide regular updates to Agency Administrators and end-users (as appropriate) regarding system changes and enhancements. Include information about SSA-provided training opportunities.
- Assign licenses to Agency Administrators and/or users.

¹Trainings may be facilitated and provided directly by LSA staff and/or may utilize trainings (recorded or otherwise) by the SSA or other parties.

- Communicate complex questions and possibly system problems to the SSA.

❖ Ensure System Compliance

The LSA will work closely with the SSA and CoC coordinators to ensure that their region maintains high performance and adherence to State and Local data system rules and expectations. Responsibilities may include:

- Complete and submit:
 - Annual Homeless Assessment Report
 - Annual Performance Report
 - Housing Inventory Chart
 - Point in Time
 - Funding Round CoC application HMIS related information.
- Work with provider Agency Administrator to maintain data quality, correct errors and assist with technical support when updates need to be made.
 - Monitor all provider pages to ensure that the pages are set up consistent with MN-HMIS and HUD data standards.
 - System audits of agency compliance of data privacy, security and oversight standards.
 - Provide with regular data quality report card for all participating agencies/programs.
- Read and understand the HUD Data Standards that underpin the rules of the HMIS.
 - Ensure that participating agencies comply with HMIS requirements via HMIS monitoring.
- Assist CoC in maintaining and increasing bed coverage (high participation of homeless programs in HMIS).
- Support the CoC's continuous quality improvement efforts.

2. State System Administrator Responsibilities

The State System Administrator (SSA) will provide state-wide system development and support to ensure that the system is fully understood and appropriately utilized by all parties. SSA responsibilities will include:

- Monitor and enhance the performance of MN-HMIS.
- Create and provide a menu of trainings and reports accessible to LSA, Agency Administrator, and end users across the state. This should include both written and recorded trainings and directions.
- Audit LSA and data sharing functions to ensure appropriate use of private data.
- Provide help desk functions to all users of HMIS.
- Host regular webinar or call-in user group meetings.
- Provide guidance and a state-wide framework for system administration to LSA and Agency Administrator
- Perform all updates and changes to the system as required by funders and the HMIS Lead Agency.
- Other duties identified in existing "Minnesota's HMIS Policies and Procedures" dated January, 2014 or later: (<http://www.hmismn.org/postings/pdfs/mnhmis-policy-and-procedures.pdf>).

❖ SSA/LSA Annual Plans

The coordination between the SSA and all LSAs is vital to the function of MN-HMIS. For this reason, the SSA will hold an Annual Support Plan and an Annual Communication Plan with each LSA. Both plans must be approved by the CoC Governing Board.

Annual Support Plan—Many LSA's may not have the capacity to perform all responsibilities assigned to the LSA (outlined in pp.4-6). In addition, there are complex agencies that provide services in multiple CoC regions or the entire state—which could create confusion regarding which LSA they go to for system support, etc. For this reason, the SSA will work with LSAs to develop an Annual Support Plan to delineate responsibilities.

- The LSA will negotiate with the SSA to assume responsibilities not conducted by the LSA.

- The LSA will communicate the delineation of duties outlined in the Annual Support Plan to all agencies participating in HMIS in their region.
- The SSA will serve as the primary support/contact to all complex agencies unless otherwise identified and agreed upon by complex agencies in Annual Support Plans.

Annual Communication Plan—A Communication Plan will be developed to clarify the steps and responsibilities of the LSA, SSA, CoCs and agency administrators as it pertains to communication in administering the system. LSAs, CoCs, and SSA will work together to develop a Communication Plan for each CoC. As much as possible, communication processes will be similar among CoCs.

3. Additional System Administrator Policies

The SSA and LSA must adhere to all policies already noted in “Minnesota’s HMIS Policies and Procedures” dated January, 2014 or later: (<http://www.hmismn.org/postings/pdfs/mnhmis-policy-and-procedures.pdf>).

Publication Policies

Publication of reports and dashboards may fall under a few different processes:

- Publication for the purpose of media distribution through website, newspaper articles, research reports, etc.
- Publication for the purpose of internal CoC evaluation and planning (by the CoC staff, LSAs, SSAs, and other key parties).
- Publication for the purpose of meeting Funder reporting requirements (information required by HUD including NOFA, AHAR, HIC, etc.).

State System Administrator (SSA) and Local System Administrator (LSA) will work together to confirm report use, design and interpretation. Our goal is to develop reports that can be shared across the system to meet similar needs and support CoCs in additional report development. Different rules may apply to the different uses as described above.

Data and reporting processes around data quality and HUD requirements will follow general state-wide HMIS processes as defined in “Minnesota’s HMIS Policies and Procedures”.

1. General Publication Policies

The following are policies that apply to all publications of HMIS data.

❖ LSA Use and Access to HMIS Data

The LSA will be responsible for producing public and evaluative reports for their CoC region. In this role, the LSA must adhere to the following policies:

- The LSA may not access or use regional, Tribal- or agency-specific data for the purpose of providing their agency or any partner agency a competitive advantage.
- Agencies may have assessments and data that is collected specifically for their agency’s internal evaluation or client support. In such cases, if the agency does not want this data to be viewed or used, they must communicate this to the LSA.
 - The LSA may not view or use data/assessments that are restricted by the agency.
 - The agency may not restrict data/assessments that are required by a Funder requiring use of HMIS (including continuum of care data/assessments).

- In some cases, there may be an LSA that is able to view and run reports for the entire CoC and specific counties within the CoC.
 - The LSA may not view or use data in counties to which they are not authorized by the CoC Governing Board.

❖ Confidentiality/Use of Identifiable Data

- All release of client identified data will be governed by the following documents:
 - MN-HMIS Informed Consent
 - MN-HMIS Release of Information
 - MN-HMIS Agency agreements (each agency will have agency agreements with both the SSA and LSA)
 - MN-HMIS Privacy Policies
 - Business Associate Agreements
 - Local Policies and Agreements
- SSA/LSA may not release an aggregated report from a data set that is small enough or unique enough to allow identification of an individual client’s information to be extracted from the report. Data cut by detailed client characteristics will generally be released in Regional representations.
- If it is determined that a preliminary report may not be published due to concerns or release of identifiable data, SSA/LSA will:
 - Shred or incinerate paper copies of the report.
 - Notify review partners to destroy any copies of the report.
 - Destroy or securely store all source calculations for the report.

❖ Continua of Care Obligations

- Each CoC is required to review routinely their CoC-wide Summary Data including counting, descriptive and outcomes reports for accuracy of data and report design.
- Each CoC is required to establish a local process to guide the publication of local/CoC specific information and the focus of their data use needs and processes.
 - Any such process must include representation from the agencies that enter data into the System either directly or through a formal review process.
- CoCs that wish to use the System to evaluate agency performance must develop a formal Evaluation Plan that is approved by the Continuum of Care Governing Board.
- Each CoC must establish a procedure for the purpose of creating and reviewing data quality.

❖ Data Quality and Validation Process

All HMIS participating agencies will follow the Data Quality Plan as outlined in “Minnesota’s HMIS Policies and Procedures”². The Data Quality Plan includes the following 5 elements; Timeliness, Completeness, Accuracy, Monitoring, and Incentives/Enforcement. This section expands on the Data Quality Plan as it pertains to local system administration.

Data Collection Timeliness—As noted in “Minnesota’s HMIS Policies and Procedures”, reducing the time period between data collection and data entry will increase the accuracy and completeness of client data. Current standards for timely data entry vary by program type.

² See Minnesota’s HMIS Policies and Procedures 2014 document (<http://www.hmismn.org/postings/pdfs/mnhmis-policy-and-procedures.pdf>)

Local CoCs may require (through CoC Governing Board action) more timely data entry/quality standards, but cannot allow data entry/quality standards to be less timely than HMIS policies.

Data Completeness and Accuracy, Data Quality Plans—In order to create reliable reports, it is absolutely vital that system administrators ensure the accuracy of data included in the reports. SSA/LSA will work with Agency Administrators to establish data quality plans including steps needed to correct poor quality data.

- Aggregated reports will be routinely reviewed at the agency, CoC and SSA levels to identify and correct data quality issues.
- All LSA and agencies are required to establish data quality and program improvement plans.
- Each CoC must establish a procedure for the purpose of creating and reviewing data quality.
- Agencies with poor quality, as determined by SSA and LSA will be required to correct data according to the level of quality concern within 14 calendar days (or sooner if the report needs to meet a shorter timeline for funders).
- System administrators will work with the agency to develop a plan to correct data quality. Levels include:
 - Red – High priority issue including; data privacy, significant missing data or other immediate/major concern affecting data integrity or privacy.
 - Yellow – Medium priority issue involving some missing/null information or similar quality concern.
 - Green – No or minor data quality or integrity issues
- Agencies exhibiting repeated data quality deficiencies and/or unresponsiveness to corrective action plans may be removed by the LSA or SSA from MN-HMIS.

Data Completeness and Accuracy, Data Validation Review Process—Prior to publishing reports, system administrators (LSA/SSA) must provide agency administrators the opportunity to ensure that the data included in reports is accurate.

- System administrators may not publish reports using data sooner than 60 days from the date of which report is run unless reports are required by Funders or are published with permission from participating agencies.
- Prior to publication, system administrators are required to run reports and send to CoCs and agencies for data review.
- Data Collection and reporting of tribal specific information will only be done with the written permission of the Tribal Council or authorized representative. CoCs where only one Tribe resides will work with the Tribe to develop a reporting plan to streamline the review/approval process.
- Each CoC is required to establish a communication plan to ensure that LSAs, CoC Coordinators, and agencies understand the obligations each have to initiate and respond to data review requests on a timely basis.
- Funder-specific reports (non-CoC), may not be produced without the permission, review and approval of the identified Funder.
- Timeline/process required for data validation
 - General Reports
 - System administrators will allow at least 20 calendar days for agencies/CoCs to review their data that will be included in reports.
 - If a CoC/agency has discrepancies with data/presentation of the report, they may respond in writing to the SSA/LSA within 20 calendar days. The SSA/LSA will then have 20 calendar days to negotiate with the CoC/agency to resolve their concerns.
 - The HMIS Advisory Task Force will make final determinations with unresolved concerns.
 - Assent will be assumed for all CoCs/agencies that do not respond in writing to the LSA/SSA within 20 calendar days.
 - Funder required reports

- System administrators may require agencies/CoCs to review and correct data included in reports within a timeline that meets the funder requirements. Such required responses may be shorter than 20 days.
- If a CoC/agency has discrepancies with data/presentation of the report, they may respond in writing to the SSA/LSA within the required timeline.
- Assent will be assumed for all CoCs/agencies that do not respond in writing to the LSA/SSA within the required timeline.
- The HMIS Advisory Task Force will make final determinations with unresolved concerns.

❖ Minimum Set of Qualifiers

All reports will be published with the following minimum set of qualifiers.

- The effective date (date on which the data draw was made) and the time frame of the report.
- Number and type of programs whose data is included in the report.
- Number and basic characteristics of Regions/CoCs included in the report.
- Pre-defined nuances in the data set including clients not represented in the data set or explanation of how the data set has been narrowed to improve accuracy.
- Information from other sources (such as Labor or Census Statistics) about the population or the community to support interpretation of the data set (as needed).
- Qualifiers, assumptions, and methodologies in defining data set(s) will be reviewed routinely, and whenever there are anomalies in studies involving subsets of data.

2. Publication Policies for Public Uses

The following policies will guide the use of information released to the public for purposes of providing resource planning, needs assessment information, community education, and research.

❖ Policies Regarding Agency-Identified Information

- Data validation process (Page 7) must be followed.
- State System Administrator (SSA) and Local System Administrator (LSA) may not release agency-identified information (aggregated information for particular agencies) to the public without prior agency approval.
- As noted in the Data Validation Review Process, CoCs and/or agencies will be provided at least 20 days to determine if their data will be included in published reports.
 - Assent will be assumed for all CoCs/agencies that do not respond in writing to the LSA/SSA within 20 days.
- SSA and/or LSA may choose to publish an agency-identified report noting the agencies that have declined approval to be included in the report.
- Data Collection and reporting of tribal specific information will only be done with the written permission of the Tribal Council or authorized representative. CoCs where only one Tribe resides will work with the Tribe to develop a reporting plan to streamline the review/approval process..

❖ Release Rules by Report Type

The review process and required qualifiers for aggregated statewide and regional information will be based on the type of aggregated report and/or the purpose of the release.

Basic descriptive or demographic statistics—This type of report provides information about the characteristics of those served by agencies participating in the project, is generally utilized for resource planning, needs assessment and community education.

- The SSA will routinely publish basic descriptive reports for Minnesota’s Regions and for basic provider types.

- SSA staff will compile and routinely update pre-defined basic descriptive statistics on who is being served including sums, percentiles and correlations. Information will be provided in charts and graphs. Counting strategies, assumptions, and qualifiers will be developed in coordination with the MN-HMIS Advisory Task Force and participating CoCs. Tables, charts and qualifiers will be published as updates are complete and made accessible to the public.
- The MN-HMIS Advisory Task Force will create a Reports Committee that will work with LSAs and CoCs to determine the information that may be included in standard dashboard reports.
- A study process will be completed in all cases where the data set includes *outcome measures*.
 - Design of outcomes reports will be guided by the User Group engaged in the measurement and the Reporting Committee.
 - Outcome reports will comply with HUD requirements.
 - All outcomes reports are available for agency review on Minnesota’s ART site. Agencies are asked to report issues related to the reports as they are identified. Reports will be routinely reviewed as part of the local and state system administrator coordination processes, such as monthly meetings.
 - SSA and LSA staff may not publish to the public agency identified outcomes without prior written review by the agency.
 - SSA and LSA may publish data sets that reflect regional performance or performance from general categories of programs with support from ongoing User Groups that support the design of the report. User Groups will be composed of a representation of agencies included in the report.
 - SSA and LSA will provide key summary reports to CoC Governing Boards (or other decision making bodies as assigned by CoC Governing Board) quarterly to assure data quality for routine releases of aggregated information.

Prevalence studies—This type of report provides information about the degree or frequency of a problem or condition and is more highly dependent on coverage levels than is basic descriptive or demographic data. Coverage levels reflect the CoC’s estimate of the percent of local homeless consumers entered into the System. More specifically, CoC members review the combination of organizations reporting to the System and determine what proportion of the homeless population, including those normally seen through outreach efforts, are included on the HMIS.

- CoCs will provide coverage estimates for the homeless clients entered into the MN-HMIS.
- CoC’s will provide a “point-in-time” coverage estimate at least annually. Coverage estimates may be amended as needed should the coverage change dramatically between reporting periods. Projections to the total count will be based on coverage estimates.

External Research studies—This type of report draws causal or predictive conclusions based on the data and depends upon statistical significance testing.

- All research studies must meet generally acceptable scientific standards related to statistical significance and reliability.
- Findings must be presented to the MN-HMIS Reports Committee or designated Review Committees and participating CoCs for comment prior to publication.
- All findings must be accompanied with a discussion of the limitations of the study.
- Where the data involves access to record level data, a Data Use Agreement will be signed by the researcher specifying privacy, access, use, retention and disposal of records.
- If the release of client level information is needed outside of the current HMIS partners or to data current HMIS partners do not currently have access to, the research policies established with the Advisory Task Force must be followed.

3. Publication Policies for Internal/CoC Evaluation and Planning Uses

LSA and their CoCs may seek to publish annual performance reports. Such reports will be used for CoC performance review, system planning and system analysis and will not be published for public use unless otherwise communicated prior to the development of the report.

❖ Evaluation and Planning Reports—Not for Public Distribution³

- Evaluation and Planning reports may include agency-level performance indicators.
- CoCs that wish to run annual performance reports to evaluate agency performance must develop a formal Evaluation Plan that is approved by CoC Governing Board. This Plan may include the frequency and content of publications and how they may/may not be posted publicly.
- Annual CoC performance benchmarks reports (unique to each CoC, based upon HUD and local benchmarks) will include agency-identified information.
 - Agencies may show cause to not be included. Such agencies may be identified in the annual performance benchmarks reports as having declined permission to be included in the report.
 - CoC funded agencies do not have the option to show cause to not be included in CoC performance evaluation reports.
 - All requests for agency omission from reports due to cause will be reviewed and approved/denied by the CoC Governing Board.
 - Data Collection and reporting of tribal specific information will only be done with the written permission of the Tribal Council or authorized representative. CoCs where only one Tribe resides will work with the Tribe to develop a reporting plan to streamline the review/approval process..
- Each CoC's annual performance benchmark report may include outcomes unique to their region, but such outcomes will be drawn from common fields as defined by the MN-HMIS Advisory Task Force.
- Data validation process (Page 7) must be followed.
- Funder-specific reports (non-CoC), may not be produced without the permission, review and approval of the identified Funder.

❖ Evaluation and Planning Reports—For Public Distribution

Evaluation and Planning Reports (including dashboard reports) that the CoC/LSA wish to make public must follow the policies and permissions identified in the "Publication for Public Uses" section (pp. 10-11).

4. Publication Policies for funder reporting requirements

Periodic reports are required by HUD (NOFA, AHAR, HIC, etc). System Administrators (SSA/LSA) will also be asked periodically to run reports for other funders (State agencies, etc.). The LSA/SSA must be able to produce these reports on a timely basis in order to meet funder requirements.

- Publication approval is not needed for use of information required by HUD during the NOFA, AHAR or HIC processes.
- The NOFA publication will include evaluation and performance data that is specific to HUD-funded agencies.
- Data validation policies (pg. 9) will be followed in the creation of funder reports.

³ It should be noted that any information in the hands of the government can be accessed through a Freedom of Information Act request. While reports may be intended for internal committee discussions it remains possible that they may be accessed by the public.

5. Summary of Publication Options

Purpose of the Report	Steps Needed to Run Report	Timeline Required
<p>Publication for Public Use Created for the general public through website, newspaper articles, reports.</p>	<ul style="list-style-type: none"> Agency/Tribal specific data requires approval of the agency/Tribe and the CoC reporting committee. Must consult Agencies/CoCs with data validation. 	<ul style="list-style-type: none"> Must run report from data at least 60 days prior OR after the data validation timelines have been met. Validation provides agencies / CoCs with at least 20 days to review/correct data.
<p>Publication for Evaluation Created for the CoC staff, LSAs, SSAs, and other key parties of CoC planning.</p>	<ul style="list-style-type: none"> Tribal specific data must be approved by Tribe. Agency specific data does not require approval if not released to public. Must consult Agencies/CoCs with data validation. 	<ul style="list-style-type: none"> Must run report from data at least 60 days prior. Validation provides agencies / CoCs with at least 20 days to review/correct data.
<p>Publication for Funder Requirements Created for Funders (HUD, State, etc.) for purpose of evaluation and compliance.</p>	<ul style="list-style-type: none"> Does not require agency or CoC reporting committee approval to use data. Must consult Agencies/CoCs with data validation. 	<ul style="list-style-type: none"> Report may be run with data more recent than 60 days as long as communicated to agencies. SSA/LSA provides clear timeline for data validation that meets funder requirements (may be less than 20 days).

CoC-Specific HMIS Policies

CoCs may develop additional HMIS policies and guidelines specific to the needs of their region so long as these policies maintain sufficient consistency with this document and “Minnesota’s HMIS Policies and Procedures” document.

- Efforts must be made to maintain consistency with state-wide policies.
- CoC-specific policies will be provided in writing for approval/denial by the HMIS Advisory Task Force. HMIS Advisory Task Force determinations must be made within two months of the request. Denials will be made in cases where the HMIS Advisory Task Force determines that local policies are disparate enough with state, regional or local policies that the effect would be detrimental to the system, agencies, and/or other CoC regions.

Grievance Process

All participants of HMIS (clients, users, agencies, etc.) may file a grievance with the HMIS Advisory Task Force in any case in which they determine the policies and agreements noted in this and other HMIS documents have not been followed. A grievance form is included in Minnesota’s HMIS Policies and Procedures 2014 document (<http://www.hmismn.org/postings/pdfs/mnhmis-policy-and-procedures.pdf>).

- The HMIS Advisory Task Force and the Minnesota Coalition for the Homeless will monitor all grievances and track outcomes, including response time and final resolution.