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Delaware Continuum of Care

CMIS Data Quality Plan

I. Introduction to Homeless Management Information Systems

Homeless Management Information Systems (HMIS) were first developed in the late 1990s in response to a mandate by Congress requiring all Continuums of Care (CoCs) to collect this data as a condition of receiving federal funding from the Department of Housing and Urban Development (HUD) to serve homeless populations. The impetus behind this mandate was to reduce and eventually solve homelessness, a problem which could never be solved if it was not understood and if progress toward that goal was not tracked.

All communities that receive federal funds to address homelessness are required to have an HMIS system, and to have an agency that administers and manages the HMIS data system - the HMIS Lead Agency. In Delaware, Housing Alliance Delaware is the HMIS lead agency.

In Delaware, we refer to our HMIS system as **CMIS – Community Management Information System**. CMIS serves as an outcome-based system that facilitates timely, efficient, and effective access to needed services and supports for persons who are homeless and at risk of homelessness. CMIS also supports local efforts. Homeless service providers need high quality data to report to their funding sources and secure new funding. Quality data also supports the efforts of providers to evaluate their own programs.

Defining Data Quality

Data quality refers to the extent that data recorded in Delaware CMIS (DE-CMIS) reflects the same information in the real world. For example:

- Required elements are collected and then reviewed and updated periodically
- Data entry (program entry, interims, exits and follow-ups) is completed in a timely fashion
- Data is consistent (e.g. date of birth for adult clients places them at or over the age of 18)
- Data is valid – users are applying the same definition to all data elements (e.g. a client is considered a veteran if they have served in **active** duty in the military, including the National Guard.)
- Data accurately reflects the client and their situation.

A perfect overlap between data and reality would result in a data quality rating of 100 percent. While it is improbable that a data collection system has a quality rating of 100%, it is critical that the system provides the best possible representation of reality as it relates to homeless people and the programs that serve them. The overall goal of DE-CMIS is to record the most accurate, consistent, timely, and comprehensive information in order to draw reasonable conclusions about the extent and impact of homelessness.

The Effectiveness of the Homeless Service System

Assessing the effectiveness of the homeless service system is critical to finding successful solutions to ending homelessness. For that reason, information at program exit, such as destination and income, are important to learn if and how the system has helped to resolve clients' housing crises and to improve their overall stability. Data on returning clients also contributes to this goal. Comparing program entry data with program exit data at the aggregate level will also provide a picture of the impact of homeless programs on the clients they serve. In summary, it is crucial to know **who** the clients are, **where** they have been served and **what happens to them** upon exit from a program.

II. Data Quality Standards

A data quality plan is a community-level document that helps the CoC achieve statistically reliable data about homelessness. This plan has been developed by the CoC and CMIS Lead Agency, Housing Alliance Delaware, and approved by the Delaware CoC System Performance Committee.

One of the most effective ways to collect quality data is to develop data collection and data entry standards that are implemented by all projects entering data into CMIS. These standards will ensure that data is accurately entered in a timely fashion and consistently across projects.

Any agency receiving HUD funds to operate their homeless assistance projects, and other projects as required by other federal and local funding sources, are required to adhere to HUD's HMIS data standards. These standards are updated every two years. When updated, they are posted on the HUD Exchange website. The most recent version of HUD's data standards can be found here: <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>.

Projects should consult with their funding sources and Housing Alliance Delaware to determine their required adherence to HUD's data standards. However, all homeless services agencies in Delaware, regardless of their funding source(s), are expected by the Delaware CoC to adhere to the basic data quality standards outlined in this document below as a condition of their use of CMIS. This will help to ensure as a community that we have high quality data to help us understand and resolve homeless in Delaware.

1. Timeliness of Data

CMIS should include the most current information possible about the clients served by participating homeless programs. For example, the clients enrolled in a project in CMIS at any given time should reflect the clients who are enrolled in the project in real life. When a client is no longer being served by a project, the client should be exited from that project as quickly as possible by the CMIS user such that the project's active enrollment in CMIS reflects their project's active enrollment in real life.

TIMELINESS STANDARD: ALL client entries, exits, and universal data elements (UDEs) must be entered and up-to-date within 3 business/work days.

**Exception: Any projects participating in Centralized Intake may have standards that are stricter and/or timely. These projects should ensure that they are following all Centralized Intake policies related to data entry in CMIS.*

2. Completeness of Data

All client and household data entered into CMIS should be complete. Missing data negatively impacts our ability to track and understand information about homeless in Delaware, and can negatively impact our community's ability to provide appropriate care to clients and/or make appropriate referrals for clients.

COMPLETENESS STANDARD A: All CMIS projects must enter data on 100% of the clients that they serve (with exceptions only given in the rare cases where clients refuse data entry).

COMPLETENESS STANDARD B: All CMIS projects must have 5% or less of “Information Missing” (null), “Client Doesn’t know,” or “Client Refused” entries for any given data element, including Name, Date of Birth, Social Security Number, Race, Ethnicity, Income & Benefits at Entry and Exit, Destination at Exit, Veteran Status, and Disabling Condition, as well as any other data standards required. These required elements may vary slightly by program type or funding source. (Information about program-specific standards can be found in the PATH, ESG, CoC and RHY HMIS manuals on the HUD Exchange website).

3. Data Accuracy

All client and household data entered into CMIS should be accurate, meaning that false or incorrect information should never be intentionally entered in CMIS. The data in CMIS should accurately reflect information about people served in homeless assistance projects. Inaccurate or false information is less desirable than missing information. If it is not possible for CMIS users to collect information about clients, it is better to enter nothing than to enter incorrect information.

ACCURACY STANDARD: Intentionally recording inaccurate information about clients in CMIS is strictly prohibited; 100% of client data in CMIS will accurately reflect the information provided by the client and/or provided by a 3rd party verifiable source.

III. Monitoring Data Quality

The following information outlines the various methods by which data quality in CMIS will be monitored in Delaware to ensure timeliness, completeness, and accuracy.

1. CMIS Training

All CMIS Users in Delaware are required to participate in a New User training prior to utilizing or accessing CMIS. This helps to ensure high quality data. All users are also required to participate in annual refresher trainings. All trainings are provided by the CMIS Lead Agency, Housing Alliance Delaware.

Refresher trainings can also be conducted as needed upon request to help ensure that users have the information that they need to enter complete and accurate data into CMIS. CMIS users are expected to reach out to the Housing Alliance Delaware for assistance with data entry when assistance is needed.

2. Data Entry Workflows

During trainings, and sometimes through electronic communication, Housing Alliance Delaware will provide CMIS users with data entry workflows that outline the steps that they should take when entering data into CMIS. Following a workflow that takes advantage of the features and

requirements of the CMIS software will also facilitate data accuracy. Following the recommended workflow will also maximize the likelihood that critical outcomes will be entered. These outcomes include housing status on exit, destination, employment status, income, non-cash benefits and health insurance. Any particular project may utilize a slightly different workflow depending on the type of project they are operating. For more detailed documentation or instructions, please contact Housing Alliance Delaware.

3. CMIS Data Quality Monitoring Responsibilities

The table below outlines the responsibilities of Housing Alliance Delaware, CMIS Agency Administrators (provider staff), and CMIS Users (provider staff) related to the ongoing monitoring of data quality in CMIS. While Housing Alliance Delaware is the CMIS Lead and will monitor the data quality of CMIS agencies and users, CMIS Agency administrators and users are expected to continuously monitor their agency’s data quality and make improvements as well.

Agency Admins are responsible for supporting their staff to attend New User Trainings and Refresher Trainings, and encouraging staff to reach out for Technical Assistance whenever needed. Housing Alliance Delaware will continue to work with Agencies to help improve data quality by running reports, identifying agencies and/or staff that are in need of additional training, workflows, and reviews.

	CMIS Lead Agency	Agency Admins	CMIS Users
Daily	Provide Technical Assistance; Provide open communication to support to all projects.	Dashboard- Counts Report for NULL UDEs	Enter Accurate, Consistent, and Timely data for all clients.
Weekly	Review reports and/or client data to identify projects needing improvement.	Review data entry completed by end users within agency; Support Notices of CMIS System Changes.	Run Caper report to track errors and help resolve data issues.
Monthly	Review Data Quality with Users; Provide suggestions to improve data quality.	Run Data Quality Reports to identify any missing information; Identify users in need Refresher Training; Discuss ways to improve data with staff.	Run APR reports to assess data errors and make necessary corrections.

Quarterly	Run Data Quality Reports and issue reports to all CMIS agencies; Offer 1-1 Refresher Training when needed; Discuss ways to improve data quality with Agency Admin' Provide updates to CMIS users about updates and requirements set by HUD.	Review reports with Housing Alliance Delaware for overall improvement of Data Quality.	Review workflow documentation and address and questions/concerns to agency admin or Housing Alliance Delaware.
Annually	Pull Data Quality Reports and review reports with Agency Admin; Run and send Project Performance Reports to Agency Admins; Review and edit training materials and CMIS Policies & Procedures Manual based on updates and requirements set by HUD.	Review CMIS Policies & Procedures Manual; Sign annual CMIS Agency Partner Agreement; Provide annual HIC forms completed.	Schedule with Housing Alliance Delaware for annual refresher trainings; sign annual CMIS User Agreement.

A variety of standard and local reports may be run at any given time by Housing Alliance Delaware to monitor data quality. Housing Alliance Delaware will primarily run the following reports in CMIS as scheduled in the chart above, and as needed in order to monitor data quality in the system at the project and system levels:

- Data Quality Reports
- Caper Reports
- Annual Performance Reports (APRs)
- Delaware CoC Project Performance Reports
- HUD System Performance Reports

IV. Ensuring Data Validity

For the purposes of this data quality plan, validity refers to all users defining and interpreting data elements the same way. Housing Alliance Delaware will review the correct definitions for each CMIS data element with all CMIS users during training. Any updates to definitions of data

elements will be provided to CMIS users by Housing Alliance Delaware. If a CMIS user has a question regarding how to define or interpret a data element they should contact Housing Alliance Delaware for direction. Some of the more frequently misinterpreted data elements and response categories are explained below.

Head of Household- a person identified in CMIS as someone who all other Household members can be associated with. There has to be one, *but only one*, Head of Household for each household. If the Head of Household leaves the project but other household members remain, then another person must be designated in CMIS as the head of Household.

Veterans – adults (18 years or older) who have served *active duty* in any branch of the military. This includes the National Guardsmen or Reservists, but only if they were called up for active duty. The ‘US Military Veteran?’ question is now located in the Client Profile. Additional questions about military service are included in the VA SSVF assessment.

Chronically homeless –

(A) An individual who: 1) Is homeless and lives in a place not meant for human habitation, in a safe haven, or in an emergency shelter; and, 2) has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years for a cumulative total of 12 month or more; and, 3) can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S. C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

(B) An individual who has been residing in an institutional care facility, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (A) of this definition, before entering that facility.

(C) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (A) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

V. Resources

In order to ensure that data quality remains high, all agencies that use CMIS should consult with HMIS resources as needed for information any updates or changes that may be made to data quality requirements or expectations.

CMIS agencies can also consult with Housing Alliance Delaware and Housing Alliance Delaware

will share accurate and up-to-date information with CMIS agencies. Below are a few relevant resources. The HUD Exchange website is the primary place to find HMIS information and resources.

HUD: HMIS DATA STANDARD MANUAL

<https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

HUD: Data Entry for HMIS Critical Data Standards Changes

<https://www.hudexchange.info/resources/documents/Data-Entry-For-HMIS-Critical-Data-Standards-Changes.pdf>

The McKinney-Vento Homeless Assistance Act;

As amended by S. 896, The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009

<https://www.hudexchange.info/resources/documents/HomelessAssistanceActAmendedbyHEARTH.pdf>