



HOUSING
ALLIANCE
DELAWARE

COMMUNITY MANAGEMENT INFORMATION SYSTEM

POLICIES & PROCEDURES

Housing Alliance Delaware
CMIS Lead Agency

TABLE OF CONTENTS

<i>INTRODUCTION.....</i>	<i>3</i>
<i>OVERVIEW OF ROLES AND RESPONSIBILITIES</i>	<i>4</i>
<i>IMPLEMENTATION OF POLICIES AND PROCEDURES</i>	<i>6</i>
CMIS Agency Partner Agreement.....	6
CMIS Agency Administrator Agreement.....	6
CMIS User Policy Agreement.....	7
Data Collection Requirements.....	7
CMIS Program Entry and Exit Date.....	8
CMIS Technical Support Protocol.....	8
Participation Fees.....	9
<i>SECURITY POLICIES AND PROCEDURES.....</i>	<i>9</i>
Training.....	9
User Authentication	11
Passwords.....	12
Hardware Security Measures.....	12
Security Violations and Sanctions	12
<i>CLIENT INFORMED CONSENT AND PRIVACY RIGHTS</i>	<i>13</i>
<i>CLIENT CONFIDENTIALITY AND HIPAA.....</i>	<i>13</i>
<i>DATA POLICIES AND PROCEDURES.....</i>	<i>14</i>
Data Quality	14
Data Use	14
Data Release.....	14
<i>APPENDICES.....</i>	<i>15</i>
Appendix A: Agency Partner Agreement.....	16
Appendix B: CMIS Agency Administrator Agreement.....	24
Appendix C: CMIS User Policy Agreement.....	29
Appendix D: CMIS Data Quality Plan.....	34
Appendix E: CMIS Fee Schedule.....	42
Appendix F: Sample Release of Information.....	43
Appendix G: CMIS Privacy Policies and Procedures	45

INTRODUCTION

History

The **Homeless Management Information System** (HMIS) is a result of a directive that Congress gave to the U.S. Department of Housing and Urban Development (HUD) in 2001. HUD was instructed to improve the amount of available data concerning homelessness in the United States to better assist in policy decision making. In response, HUD mandated all Continuum of Care (CoC) regions to implement databases that can provide an unduplicated count of clients served. HMIS is a computerized data collection application that does the following:

- Facilitates the collection of information on homeless individuals and families using residential or other homeless assistance service agencies, and
- Stores that data in a centralized database for analysis.

HMIS in Delaware: CMIS

In Delaware, HMIS is known as the **Community Management Information System**, or CMIS. HUD and other planners/policymakers at the federal, state, and local levels use aggregate CMIS data to track the extent and nature of homelessness over time. Specifically, CMIS is used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the performance and effectiveness of Delaware's homeless assistance programs. CMIS also links homeless service providers statewide to create a more coordinated and effective housing and service delivery system for people experiencing homelessness.

CMIS is administered, managed, and staffed by Housing Alliance Delaware (HAD), making HAD the CMIS Lead Agency. HAD is responsible for providing technical assistance to an Agency Partner, agencies that participate in CMIS, and End Users of the system. As a condition of participation in and use of CMIS, each Agency Partner agrees to follow the guidelines for CMIS data privacy, security, and accuracy. The guidelines listed in this document are a supplement to the legally binding Agency Agreement that each Agency Partner signs.

Importance of CMIS

CMIS participation equips service providers in Delaware with a strategic advantage in the following ways:

- Many national and local funders now require HMIS participation to track progress. Agencies already onboarded on CMIS are better positioned to meet compliance requirements as they apply for funding opportunities.
- Housing Alliance Delaware utilizes Community Services, an HMIS software hosted by WellSky, that allows multi-level client data, client case coordination, and electronic referrals to be shared among organizations. This locally developed information sharing model prevents service duplications and encourages collaboration, while limiting access to sensitive data.

On top of its standard data collection and reporting functionalities, this HMIS software includes a comprehensive case management module, bed management, performance measurement tools, ad-hoc reporting, software customization options, and more.

OVERVIEW OF ROLES AND RESPONSIBILITIES

HAD Responsibilities

- Select Homeless Management Information System Vendor.
 - Review national, state, and local laws governing privacy and confidentiality protections; determine applicability to existing CMIS policies and procedures.
 - Maintain and update files for CMIS software to include software agreements, HUD Technical Submissions, and HUD executed agreements.
 - Execute CMIS Agency Partner Agreements.
 - Execute CMIS Agency Administrator Agreements.
 - Execute User Policy Agreements.
 - Develop and maintain CMIS agency files to store original signed Agreements pertaining to CMIS, including the Agency Partner Agreement, Agency Administrator Agreement, and User Policy Agreement.
 - Develop and update, as needed, the CoC's Data Quality Plan, CMIS Policies and Procedures, and other policy and procedure documents related to the administration of CMIS.
 - Distribute copies of CoC CMIS Policies and Procedures for CoC Board approval every two years.
-

- Run and Distribute System Performance Reports, Data Quality Reports, and Reports for System Performance and Maintenance.
- Manage all federal data submissions such as Point in Time (PIT) Count, Housing Inventory Count (HIC), Longitudinal Systems Analysis (LSA), and System Performance Measures (SPM) Report.
- Conduct unduplicated accounting of homelessness annually.
- Provide system maintenance and notification of software updates to CMIS Users through CMIS System News and email for time-sensitive updates.
- Provide New User, Refresher, and Reporting training.
- Provide technical support to CMIS-participating agencies for troubleshooting and data input.
- Grant CMIS access to new users by issuing their username and password to begin entry of data when training has been completed.
- Regularly monitor Agency Partner and User compliance with applicable CMIS standards.
 - Review CMIS data to ensure that Agency Partner programs are using CMIS accurately and intentionally.
 - Assist CMIS End Users and Agency Partners who struggle to meet data quality standards.
 - Respond to agencies' requests for additional training and support.
 - Develop and monitor data quality recommendations for improvements when applicable.
- Investigate and manage all documentation for all security violations and determine required sanctions and/or revocation of privileges.

Continuum of Care (CoC) Responsibilities

- CoC System Solutions Committee
 - Review and approve of all policies and procedures related to the administration of HMIS/CMIS in Delaware.
 - Make recommendations to the CoC board for approval.
 - Evaluate CoC performance using CMIS data, and lead efforts to improve system and project performance.
 - CoC Board
 - Approve all policies and procedures related to the administration of CMIS in Delaware.
 - Designate the CMIS Lead Agency in Delaware.
-

Agency Partner Responsibilities

- Comply with all applicable CMIS Party agreements.
- Execute and manage CMIS User Policy Agreements with all staff who have CMIS access.
- Designate at least one Agency Administrator and execute and manage CMIS Agency Administrator Agreement.
- Comply with the CMIS Data Standards.
- Timely and accurately enter all required data into CMIS upon enrollment into projects, including entries, interims, exits, and follow-ups, where applicable.
- Proactively seek assistance from the CMIS Lead Agency for training, reports, and other technical assistance as needed.
- Promptly notify HAD of changes to users, including variations in staff project participation, terminations, and any long-term absences.
- Immediately alert HAD of any potential data privacy or data security violations.

IMPLEMENTATION OF POLICIES AND PROCEDURES

CMIS Agency Partner Agreement

The Executive Director or CMIS-dedicated Administrator of any Agency Partner shall follow, comply, and enforce the CMIS Agency Partner Agreement (Appendix A). The Administrator must sign the CMIS Agency Partner Agreement before any new user is given access to CMIS. Signing the CMIS Agency Partner Agreement is a prerequisite to training and user access.

- An original signed CMIS Agency Partner Agreement must be executed before any provider is created in CMIS.
- For existing projects, a new CMIS Agency Partner Agreement must be signed annually.
- After the CMIS Agency Partner Agreement is signed, CMIS Lead Agency staff will schedule training for new End Users to use CMIS.
- HAD will provide, collect, maintain records of, and execute all CMIS Agreements.

CMIS Agency Administrator Agreement

At least one Agency Administrator, an individual designated by the Agency Partner to be the main point of contact for CMIS-related processes and policies, shall follow, comply, and enforce the CMIS Agency Administrator Agreement (Appendix B).

- The Agency Administrator(s) must sign an Agency Administrator Agreement before any major updates on behalf of the Agency Partner
-

- in CMIS, including new providers and CMIS training.
- A new CMIS Agency Administrator Agreement must be signed annually by CMIS Agency Administrators.
 - Upon execution of the Agency Administrator Agreement, the Agency Administrator will be the main point of contact for CMIS-related matters. They must work with leadership (if applicable) to determine how responsibilities and communications should be shared within the Agency Partner.
 - All CMIS User Policy Agreements for the Agency Partner are approved through the signing of the Agency Administrator Agreement.
 - Agency Administrators who are also CMIS end users must also follow, comply, and enforce the CMIS User Policy Agreement (see below).
 - CMIS Agency Administrator Agreements must be kept on file by both HAD and the Agency Partner.

CMIS User Policy Agreement

Each End User of any Agency Partner shall follow, comply, and enforce the CMIS User Policy Agreement (Appendix C). End Users must sign a CMIS User Policy Agreement before a new user training is scheduled and before CMIS access is provided.

- CMIS User Policy Agreements must be kept on file both by HAD and the Agency Partner.
- A new CMIS User Policy Agreement must be signed annually by all End Users.

Data Collection Requirements

Agency Partners will collect and verify the minimum set of data elements for all clients served by their programs within the timeframe outlined in the DE Continuum of Care Data Quality Plan (Appendix D).

During client intake, follow-up meetings, and exit interview, staff of Agency Partners must collect the following as set forth in the most recent HMIS Data Standards Manual. Subsequently, collected data must be entered into CMIS by the Agency Partners' End Users.

- **Universal Data Elements**, as identified by HUD.
- **Program-specific Data Elements**, based on the program type each agency operates.

The following program types have program-specific data elements, which can be

found in the HMIS Data Standards Manual:

- HUD CoC
- HUD ESG
- HOPWA
- PATH
- RHY
- VA
- SSVF (including Targeting Criteria)

CMIS Program Entry and Exit Date

Three (3) business days is the expected timeframe that End Users of any Agency Partner must add client information into CMIS. This applies to both Program Entry and Exit. A Program Exit can be defined as either:

- When client exited the program, or
- When client received their last service.

Additionally, this applies to clients who disappeared or did not complete an exit interview, warranting a Reason for Leaving of *Unknown/Disappeared*, and/or Destination of *Other/Unknown*.

- End users must enter the exact month, day, and year of Program Entry and Program Exit.
- For returning clients, End Users must record a new Program Entry Date and enter a corresponding Program Exit Date for each enrollment.

CMIS Technical Support Protocol

CMIS staff will provide a reasonable level of support to Agency Partners via email, phone, or in-person as requested. CMIS users should first seek technical support from their own agency's CMIS Agency Administrator. When more expertise is required to further troubleshoot an issue, an Agency Administrator or End User should email the CMIS central support desk: cmis.support@housingalliance.org.

Through this support desk, the following CMIS staff will respond to tickets based on their availability and respective scope of responsibilities:

- Amelia Ramsaran, CMIS Program Manager
- Frances Ann Marquez, Database Administrator

The chart below displays common CMIS topics and who to contact between Agency Administrator, the CMIS Program Manager, and the Database Administrator.

Topic	Agency Administrator	CMIS Program Manager	Database Administrator
Agency and User Licenses		X	
Billing Notices and Billing Questions		X	
Data Quality <i>(depends on scope of issue)</i>	X		
Development of Reports			X
Logins/Passwords	X	X	
Project Set-Up and Development			X
Run and Distribute Reports	X		X
Technical Assistance <i>(depends on scope of issue)</i>		X	X
Training		X	X
Training Materials		X	
Visibility			X

Technical Support Hours are Monday through Friday (excluding holidays) from 9:00 AM to 5:00 PM. End Users must provide all possible details through any applicable method (screenshots, reports, etc.) to aid CMIS staff in determining a resolution. CMIS Administrators will respond to all email inquiries and issues within two (2) business days; support load, holidays, and other events may affect response time.

Participation Fees

Pursuant to the terms of use, HAD will invoice and collect all user license fees. These fees cover the cost of the user licenses and administrative costs associated with managing the operation of the system. Please refer to the CMIS Fee Schedule (Appendix E) regarding participation fees.

SECURITY POLICIES AND PROCEDURES

Training

Each End User must receive New User Training prior to gaining access to CMIS. To prompt the onboarding process, an Agency Administrator must first notify a Housing Alliance Delaware System Administrator by emailing the CMIS central support desk: cmis.support@housingalliance.org. Once a completed CMIS User Policy Agreement

is returned, a login will be created for the End User through an online Learning Management System (LMS) hosted by TalentLMS. Upon the completion of the New User Training series, the End User will schedule a follow-up meeting with the CMIS Lead Agency, where training will conclude. All required training in the LMS and with CMIS staff must be completed prior to receiving access to CMIS.

If a non-licensed user accesses CMIS prior to their official training, that would result in a violation of CMIS security protocols. Appropriate action will be taken to address this violation.

CMIS staff will provide new End Users with a copy of this CMIS Policies and Procedures Manual, CMIS Privacy Policies (Appendix G), and access to training materials. All training includes Data Quality Improvement training.

Course Description	Course Detail
New User Training	<p>Users will be provided access to an LMS for a self-paced CMIS New User Training series. Users will be introduced to DE-CMIS and its purpose, as well as basic information on data security and data privacy.</p> <p>Concepts needed to utilize CMIS will be outlined, including an introduction to HUD data standards, data quality standards based on the DE-CoC Data Quality Plan, and agency- and system-level reporting. Users will then receive a technical walkthrough of the system as it applies to their data entry workflow. They will be taught the necessary skills to complete the client data collection process (also referred to as intake, entry, or check-in), project entry/exit, and client updates.</p> <p>Upon the completion of the online training series, users will schedule a follow-up meeting with a HAD administrator, to review program-specific workflows, ask remaining questions, and receive their CMIS login to access the system.</p>

<p>Refresher Training</p>	<p>All CMIS users are required to complete a self-paced Refresher Training annually through the LMS. Users will review system updates, data entry/exit processes, and data quality. End users must complete the Refresher within ninety (90) days upon assignment or their CMIS access will be suspended.</p> <p>HAD administrators will reach out to Agency Administrators and some end-users in need of additional technical support for a required follow-up meeting.</p> <p>Additionally, CMIS users will have continued access to an online LMS for on-demand refreshers on data entry and data quality originally provided during onboarding.</p>
<p>Reporting Training</p>	<p>Provided on demand, users are walked through the various reporting options available in CMIS (called canned reports). If a user has a BusinessObjects license, they will also be introduced to the different customized reports tailored for each agency. A HAD Administrator will create/update agency folder/files with existing reports and create reports upon request.</p>

User Authentication

Only users with a valid username and password combination can access CMIS. CMIS staff will provide a unique username and initial password for eligible individuals after the completion of New User Training.

The Agency Partner will designate which of their employees will have CMIS access. User access will be granted only to those individuals whose job functions require legitimate access to the system.

Sharing of usernames and passwords is a breach of CMIS Agreements. Usernames and passwords must be secure to protect the confidentiality of client information.

The Agency Partner must notify CMIS staff within **five (5) business days** when an End User is either no longer their employee or no longer needs CMIS access. Users who have not logged into CMIS for more than 90 days will be locked out due to inactivity. Inactive end users may have their logins revoked and reassigned to another user.

Passwords

- CMIS passwords will automatically reset every 45 days.
- CMIS users must maintain the confidentiality of their passwords.
- HAD staff will provide new users with a unique username and temporary password during required training.
- End Users will be required to create their password using between eight and sixteen characters and contain characters with a minimum of one character from the following four categories:
 - (1) uppercase characters (A through Z),
 - (2) lower case characters (a through z),
 - (3) numbers (0 through 9), and
 - (4) non-alphabetic characters (for example, \$, #, %).
- End Users may not use the same password consecutively but may use the same password more than once.
- Access to CMIS will be locked out if the End User incorrectly enters their login information three (3) times. The End User must reach out to the CMIS support desk to have their password reset and regain CMIS access.

Hardware Security Measures

Agency computers and networks used to access CMIS must have virus protection software and firewall installed. Virus definitions and firewall must be regularly updated.

Security Violations and Sanctions

- All End Users must report potential security breaches (e.g., hacking) and violations of any security protocols to a Housing Alliance Delaware System Administrator as soon as practicable.
 - All End Users are obligated to report suspected instances of noncompliance and/or security violations to a Housing Alliance Delaware System Administrator as soon as practicable.
 - HAD staff will investigate potential violations.
 - HAD will lock accounts in potential violation until the security concern has been addressed.
 - HAD will notify the Agency Partner for clarification of all potential violations.
 - HAD will review responses from Agency Partners and determine instances of noncompliance and/or security violations.
 - As lead CMIS agency, HAD is authorized to determine whether Agency Partner/User sanctions, suspensions, and/or revocation of privileges is warranted.
-

- Any End User found to be in violation of security protocols will be sanctioned accordingly. Sanctions may include but are not limited to suspension of system privileges and revocation of system privileges.

CLIENT INFORMED CONSENT AND PRIVACY RIGHTS

Agency Partners must obtain client consent prior to entering any personally identifiable information into CMIS. Services must not be denied if a client chooses not to include personal information in CMIS. Personal information collected about the client should be protected. Each Agency Partner and CMIS End User must abide by the terms in the Agency Partner Agreement (Appendix A), Agency Administrator Agreement (Appendix B), and User Policy Agreement (Appendix C). These include:

- A Release of Information (ROI) form (sample provided in Appendix F) must be signed by the client and kept on file for data collection and sharing in CMIS.
 - Only under circumstances approved by HAD may client consent be given verbally.
- Clients who provide consent to entering personal information into CMIS also consent to the sharing of client and household data by Agency Partners with one another for purposes outlined in the CMIS Privacy Policies and Procedures (Appendix G).
- Any information that the client wishes to be disclosed to an agency that does not utilize CMIS must be shared by Housing Alliance Delaware and with the consent of the client.
- If a client refuses consent to share information, the End User should check “No” on the Release of Information (ROI) screen in CMIS to ensure that data is not shared.
- When clients withhold consent, the End User will include a client identifier to recognize the record in the system.
- Agency Partners shall comply with all other applicable Federal and State Confidentiality laws and regulations.

CLIENT CONFIDENTIALITY AND HIPAA

Note: The CMIS Standards and the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Standards are mutually exclusive. An organization that is covered under the HIPAA standards is not required to comply with the CMIS privacy or security standards if the organization determines that a substantial portion of its protected information about homeless clients is protected health

information, as defined in HIPAA rules.

Federal/HIPAA laws take precedence over CMIS Standards. HIPAA laws provide important privacy and security protections for protected health information. It would be an unreasonable burden for providers to comply with and/or reconcile both HIPAA and CMIS rules. This spares organizations from having to deal with the conflicts between the two sets of rules.

DATA POLICIES AND PROCEDURES

Data Quality

All data entered in CMIS must meet data quality standards. Agency Partners are responsible for their End Users' data quality. Data quality refers to the timeliness, completeness, accuracy, and consistency of information collected and reported in CMIS. All End Users of CMIS should adhere to the data quality standards outlined in the DE Continuum of Care CMIS Data Quality Plan (Appendix D).

Data Use

All End Users will follow the CMIS Privacy Policies and Procedures to guide the use of client information stored in CMIS. Client data may be used, or disclosed, for system administration, technical support, program compliance, analytical use, and other purposes as required by law. Uses involve sharing client information with persons within an agency. Agency Partners may use data contained in the system to support the delivery of services to their clients. Agencies may use or disclose client information internally for administrative functions, technical support, and management purposes. Agency Partners may also use client information for internal analysis, such as analyzing client outcomes to evaluate their program.

Data Release

Data release refers to the dissemination of aggregate, anonymous, or de-identified client-level data for the purposes of system administration, technical support, program compliance, and analytical use.

- No identifiable client data will be released to any person, agency, or organization who is not a CMIS Agency Partner for any purpose, without permission from the client and a memorandum of agreement between the non-CMIS Agency Partner and Housing Alliance Delaware.
 - As the CMIS Lead Agency, Housing Alliance Delaware will encrypt emails with attachments containing identifiable client data, should such data be
-

requested.

- Aggregate data – data that does not include personally identifying information may be released to non-CMIS Agency Partners, at the discretion of the Continuum of Care and/or CMIS Lead Agency.

APPENDICES

Appendices	Document Title
Appendix A	CMIS Agency Partner Agreement
Appendix B	CMIS Agency Administrator Agreement
Appendix C	CMIS User Policy Agreement
Appendix D	Delaware Continuum of Care CMIS Data Quality Plan
Appendix E	CMIS Fee Schedule
Appendix F	Sample Release of Information: Authorization to Disclose Client Information
Appendix G	CMIS Privacy Policies and Procedures

Appendix A: Agency Partner Agreement

DELAWARE COMMUNITY MANAGEMENT INFORMATION SYSTEM (DE-CMIS) AGENCY PARTNER AGREEMENT

DE-CMIS is a management information system that offers functionality including a standardized assessment of client needs, creation of individualized service plans, and the tracking of the utilization of housing and other services. Data entered in DE-CMIS can be used for planning purposes, including evaluating utilization of services, identifying gaps in Delaware's service continuum, and measuring outcomes and system performance.

The signature of the Authorized Official of the Agency Partner to this agreement indicates acceptance of the terms set forth in this Agreement. This Agreement must be executed before a DE-CMIS account can be created for the Agency Partner.

DE-CMIS is governed by the Delaware Continuum of Care (CoC). The Delaware CoC has designated Housing Alliance Delaware (HAD) as the legal entity to serve as the DE-CMIS Lead and eligible applicant to HUD.

I. DEFINITIONS

"Agency Administrator" is a designated point of contact within an Agency Partner on DE-CMIS matters.

"Agency Partner" (AP) is party agency in this agreement.

"Client" is a consumer of services.

"Client records" is any information entered into the DE-CMIS system, including identification, personal characteristics, or circumstances of a particular client.

"Housing Alliance Delaware" (HAD) is the DE-CMIS Lead Agency.

"Identifying data" is any information that can be used to identify a client, as well as any information, the disclosure of, which would violate local, state, or federal law. Such information includes, but is not limited to, name, physical address, date of birth, sex, race, marital status, sexual orientation, information regarding household members, Social Security number, housing and homeless status, details about cause and timing of that status, employment status, income, or veteran status.

"Release of Information" (ROI) is the documentation in which client provides consent for their information to be input into DE-CMIS.

"Statistical data" is any information that is generated by aggregating two or more client records that do not disclose identifying data about any individual client.

"User" is an Agency Partner employee with approved access to DE-CMIS.

II. **CONFIDENTIALITY**

- A. The AP shall comply with all applicable federal and state privacy and confidentiality laws and regulations. The AP shall only release client records upon written consent of the client, unless release is required by the state or federally.
 - B. The AP shall comply with state and federal confidentiality laws and regulations. The federal rules prohibit the disclosure of substance use records, unless disclosure is expressly permitted by written consent of the person to whom it pertains, or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical, or other, information is not sufficient to release substance or mental health records or information.
 - C. The AP shall provide, to their clients, a verbal explanation of the DE-CMIS database and the terms of consent. In the event that an individual is not literate in English or has difficulty understanding the consent form, the AP shall provide a qualified interpreter.
 - D. The AP agrees not to release any confidential information received from the DE-CMIS database to any organization, or individual without knowing and voluntary consent of the Client.
 - E. The AP shall ensure that all staff, volunteers, and other persons issued a User ID and password for DE-CMIS receives confidentiality training and ensure that only the named User assigned a DE-CMIS license uses that issued User ID and password.
 - F. The AP understands that the Client data will be encrypted at the server level using encryption technology.
 - G. The AP understands the file server, which will contain all Client information, including encrypted identifying Client information, will be co-located at Venyu / Cyber Innovation Center 6300 East Texas Street, Bossier City, LA 71111. The location of this information may change at any time, without notice to the AP. However, within 72 hours of any request for the location from the AP, Housing Alliance Delaware must provide the physical location.
 - H. The AP shall maintain written documentation of each Client's consent to participate in the DE-CMIS database pursuant to II. D. above.
-

- I. The AP agrees to share its Client data with other DE-CMIS Agencies to the extent that the Client has consented to sharing personal information in DE-CMIS. Sharing of Client data across DE-CMIS Agencies will be accomplished by the Global Visibility settings in CMIS at the system level for all projects.
- J. The Client shall not be denied access to their Client data entered by the AP. Agency Partners are bound by all restrictions placed upon the data by the Client of any Agency Partner. The AP shall diligently record in the DE-CMIS system all restrictions requested by the Client. The AP shall not knowingly enter false or misleading data under any circumstances.
- K. If this Agency Agreement is terminated, HAD and remaining Agency Partners shall maintain their right to use all of Client data previously entered by the terminating Agency Partner subject to any restrictions requested by their Client.
- L. The AP will utilize the DE-CMIS Release of Information (ROI) form for all Clients who provide information for entry into the DE-CMIS database. An example can be found in the CMIS Policies and Procedures Manual. If the client elects to share their personal information, the DE-CMIS Release of Information form, signed by the Client, authorizes Client data to be entered into the DE-CMIS database and authorizes information sharing with DE-CMIS Agency Partners. Alternatively, the Client may deny the AP permission to enter, or share, their client information. The Release of Information form shall be used to record this client decision.
- M. If a Client withdraws consent for release of information, the Agency Partner remains responsible for ensuring that Client's information is no longer available to other Agency Partners. The AP will document the Client's decision by completing a new DE-CMIS Release of Information form. The AP will information HAD timely of any change in a Client's information-sharing instructions.
- N. The AP shall keep signed copies of the Release of Information (ROI) forms for DE-CMIS for a period of three (3) years.
- O. The AP understands that services are not in any way contingent upon a Client's participation in the DE-CMIS database. Services should be provided to Clients regardless of DE-CMIS participation if the Clients would otherwise be eligible for the services.

III. **DE-CMIS USE AND DATA ENTRY**

- A. The AP shall follow, comply with, and enforce the "User Obligations", "User Code of Ethics", and "User Responsibility", which is found in the CMIS User Policy Agreement. Modifications to the User Obligations, User Code of Ethics, and Responsibility Statement shall be established in consultation with Agency Partners and may be modified as needed for the purpose of the
-

smooth and efficient operation of the DE-CMIS system. Housing Alliance Delaware will announce approved modifications in a timely manner in the DE-CMIS System News tab on the Home Page Dashboard. Any revised User Policy document will be available immediately to Agencies upon request.

- B. The AP shall only enter individuals in the DE-CMIS database who are under the AP's jurisdiction. The AP shall not misinterpret its Clients in the DE-CMIS database by entering information known to be inaccurate or incomplete.
 - C. The AP shall use Client information in the DE-CMIS database, as provided to the AP, or Agency Partner, to assist the AP in providing adequate and appropriate services to the Client.
 - D. The AP shall operate in good faith and exert best efforts to comply with and enforce all CoC data quality standards. The data quality standards, entitled, "CMIS Data Quality Plan", are included in the CMIS Policies and Procedures Manual. Agency staff will enter or review the 2024 HUD Universal Data Elements whenever entering a Client into an Agency project. Modifications to the DE-CMIS Data Quality Standards shall be established in consultation with Agency Partners and may be modified as needed for the purpose of the smooth and efficient operation of the DE-CMIS system. HAD will announce approved modifications in a timely manner in the DE-CMIS System News tab on the Home Page Dashboard. Any revised data quality standards document will be made available immediately to Agencies upon request.
 - E. The AP shall consistently enter information into the DE-CMIS database. Agency data entry shall be timely, accurately, and will be as complete as possible, conforming to the latest HUD Data Standards. The AP is ultimately responsible for the data quality and integrity of all Client records which Agency staff enter into DE-CMIS. The AP is responsible for acquiring and maintaining the specialized knowledge and skill for the reporting requirements for all relevant programs, i.e., ESG, VA/SSVF, PATH, RHY, and HOPWA. HAD will assist and provide training for reporting in these programs. The AP is responsible for the accuracy, completeness, and timeliness of such program reporting.
 - F. The AP will not intentionally or knowingly enter inaccurate information to override information entered by another Agency.
 - G. The AP shall not include profane, inappropriate, or offensive language in the DE-CMIS database.
 - H. The AP shall utilize the DE-CMIS database for the purpose of DE-CMIS business only.
 - I. The transmission of material in violation of any federal, or state regulations, is prohibited. This includes, but is not limited to, copyright material, material
-

legally judged to be threatening or obscene, and material subject to trade secret protection.

- J. The AP shall not use the DE-CMIS database with intent to defraud federal, state, or local governments, individuals, or entities, or to conduct any illegal activity.
 - K. **The AP shall pay an annual fee of \$300 for each of their CMIS Users.** This fee includes: a unique username and password, training, support desk assistance, assistance with reporting, support and assistance with data quality standards, and additional technical assistance pursuant to III. L. of this Agreement. The \$300.00 per CMIS User invoice period is 9/1/2023 through 8/30/2024. New User participation fees will be prorated on a semi-annual (6 month) basis during the program year. DE-CMIS Users should possess basic personal computer competency, including the ability to work effectively on a Windows operating system.
 - L. **The AP may pay an annual fee of \$200 for an advanced Report Viewer license,** which will be attached to a CMIS User profile. This fee includes support from the DE-CMIS Database Administrator to build reports that the AP can run as needed. The \$200.00 per Report Viewer license invoice period is 9/1/2023 through 8/30/2024. BusinessObjects license fees will be prorated on a semi-annual (6 month) basis during the program year.
 - M. HAD System Administrators will be available for routine technical assistance (i.e., User password resets, troubleshooting, and simple report generation) during HAD business hours, Monday through Friday.
 - N. Additional invoicing beyond annual CMIS User fees, i.e., additional technical assistance, will be submitted based on HAD's DE-CMIS vendor terms.
 - O. HAD will send any additional costs by HAD's DE-CMIS vendor for any customization on reports, system design, or services beyond the scope of HAD's ability. A Scope of Work will be created that outlines the work to be completed and an estimate of the time that it will take to complete the work by HAD's DE-CMIS vendor.
 - P. HAD will provide access to an online Learning Management System (LMS) to all new Users upon the execution of a User Policy Agreement. The new User will use the self-paced, online training to learn to enter and maintain Client data required in DE-CMIS for their projects and programs. A follow-up meeting to a New User Training will allow Users to get access to DE-CMIS. Refresher Training will be required annually for all Users through the LMS. HAD may assign an additional follow-up training to complete some Refreshers. Refresher Training must be completed within ninety (90) days of assignment.
-

- Q. **The AP will notify HAD within five (5) business days when an AP User no longer requires a CMIS license** due to separation from employment, position transfer, or change in assignment.
- R. **The AP will notify HAD of new projects within ten (10) business days prior to their operational start.** The AP will work with HAD staff to complete the Provider Setup Form, including the Housing Inventory Chart (HIC) profile, of the new project. **This is required whether the project will be a CMIS-participating project or not**, as CMIS and non-CMIS projects are reportable to HUD on the annual Housing Inventory Chart. A detailed Shelters Module inventory of buildings, floors, units, and beds, if appropriate, will be required prior to project start-up.
- S. **The AP will notify HAD within ten (10) business days of a project's termination.** The AP will work with HAD to ensure that an Operation End Date is provided and all clients from the project are correctly closed out.
- T. **The AP will notify HAD within ten (10) business days of a major change in a project's housing inventory**, affecting bed or unit availability in a project. The AP will also review its Housing Inventory Chart data, supplied by HAD, for each project at least annually as determined by HAD. The AP will communicate any updates to its project(s) to HAD within the requested timeframe.

IV. **REPORTING**

- A. The AP shall retain access to identifying and statistical data on Clients it serves.
 - B. The AP's access to data on Clients it does not serve shall be limited to data consistent with the Client's documented consent.
 - C. The AP may make aggregate data available to other entities for funding or planning purposes or for the provision of services to homeless persons. However, such aggregate data shall not directly or indirectly identify individual Clients.
 - D. The responsibility for completeness and accuracy of CMIS reports generated by HAD **is the responsibility of, and dependent upon, the accuracy and quality of the data entered by the subject Agency and its Users.**
 - E. HAD may use only unidentified, aggregate DE-CMIS data for policy and planning decisions, in preparing federal, state, or local applications for funding, to demonstrate the need for an effectiveness of programs and to obtain a system-wide view of program utilization in the state. With the execution of a data sharing agreement that clearly identifies persons with access and their obligations of confidentiality and protection of the data, HAD
-

may make identifying Client information available to trusted third party professional entities for the planning and data analysis purposes.

- F. HAD will periodically distribute various data quality reports to the AP, which addresses the data within AP's DE-CMIS projects. Data deficiencies and omissions identified in DE-CMIS records will be the AP's responsibility to correct in a timely manner. HAD will be available to consult with the AP and User on the necessary corrective action(s) to be taken. HAD will provide guidance to minimize future similar data errors. The AP is responsible for the data quality and integrity of all Client records which AP Users enter into DE-CMIS.

V. **PROPRIETARY RIGHTS OF DE-CMIS**

- A. The AP shall not share, release, or distribute usernames and passwords of the DE-CMIS database to any other APs, Users, businesses, or individuals.
- B. The AP shall not intentionally or knowingly cause corruption of the DE-CMIS database in any manner.

VI. **TERMS AND CONDITIONS**

- A. This Agreement, dated September 1, 2023, is in effect until September 30, 2024, a period of 13 months.
 - B. An Agency Agreement must be executed annually for Agency participation in DE-CMIS.
 - C. AP User access may be denied or terminated by HAD for failure to provide and execute User Policy Agreement renewals before the expiration of the previous year's Agreement.
 - D. The Agency Partner Agreement may be terminated by HAD for failure to pay annual invoices in full by the due date unless other arrangements can be agreed to by both parties.
 - E. Neither HAD nor the AP shall transfer or assign any of their rights or obligations under this Agency Partner Agreement without the prior written consent of the other party.
 - F. This Agreement may be terminated by either the AP or by HAD within 90 days of written notice.
-

This Agency Partner Agreement will be effective from September 1, 2023 through September 30, 2024, once signed by the Agency Authorized Official or Agency Administrator and by Housing Alliance Delaware.

FOR AP AGENCY AUTHORIZED OFFICIAL OR ADMINISTRATOR –	
Agency Name	
Agency Address	
Agency Mailing Address <i>(leave blank if same as above)</i>	
Print Name	
Contact Number	
Signature	
Date	

FOR HOUSING ALLIANCE DELAWARE SYSTEM ADMINISTRATORS ONLY –	
Name	
Title	
Signature	
Date	

Appendix B: CMIS Agency Administrator Agreement

DELAWARE COMMUNITY MANAGEMENT INFORMATION SYSTEM (DE-CMIS) AGENCY ADMINISTRATOR AGREEMENT

DE-CMIS is a management information system that offers functionality including a standardized assessment of client needs, creation of individualized service plans, and the tracking of the utilization of housing and other services. Data entered in DE-CMIS can be used for planning purposes, including evaluating utilization of services, identifying gaps in Delaware's service continuum, and measuring outcomes and system performance.

Housing Alliance Delaware requires the authorization of at least Agency Administrator within the Agency Partner, to establish a point of contact on DE-CMIS matters and HAD's expectations of individuals assuming this role.

The signature of an Agency Partner's designated Agency Administrator on this agreement indicates acceptance of the terms set forth in this Agreement. These policies are to be followed regardless of the Agency Administrator's status as a DE-CMIS end user. This Agency Administrator Agreement must be executed by the assigned deadline for ongoing DE-CMIS participation by the Agency Administrator.

II. **DEFINITIONS**

"Agency Administrator" is a designated point of contact within an Agency Partner on DE-CMIS matters.

"Agency Partner" (AP) is the CMIS participating agency in this agreement.

"Client" is a consumer of services.

"Client records" is any information entered into the DE-CMIS system, including identification, personal characteristics, or circumstances of a particular client.

"End User" is an Agency Partner employee with approved access to DE-CMIS.

"Housing Alliance Delaware" (HAD) is the DE-CMIS Lead Agency.

"Project" is the file created in DE-CMIS to refer to a specific provider or program funded and/or operated by the Agency Partner, to allow for client-level data entry.

“Release of Information” (ROI) is the documentation in which client provides consent for their information to be input into DE-CMIS.

III. CMIS AGENCY ADMINISTRATOR OBLIGATIONS

A) Adherence to DE-CMIS Policies and Procedures

As the AP’s main point of contact for DE-CMIS policies and procedures, the Agency Administrator is responsible for ensuring that major processes outlined in the CMIS Policies & Procedures Manual and Agency Partner Agreement (APA) are completed, on behalf of the AP. This includes:

- Ensuring that all DE-CMIS confidentiality, data security, and data privacy processes are followed by the AP.
- Understanding and adhering to (if applicable) the expectations outlined in the DE-CMIS User Policy Agreement.
- Understanding that if outlined policies and procedures are not the responsibility of the Agency Administrator, that responsibilities are communicated and delegated within the Agency Partner.

B) DE-CMIS Provider/Project Management

- The Agency Administrator will notify HAD of new projects within ten (10) business days prior to their operational start. This is required whether a project will be CMIS-participating or not. HAD will work with the Agency Administrator on all aspects of provider setup.
- The Agency Administrator is responsible for completing a Provider Setup Form for all new projects to be set up in CMIS. The Agency Administrator may request assistance from HAD, but dates of operation and terms of grant(s) used for the project must be collected prior to provider setup.
- The Agency Administrator will notify HAD within ten (10) business days of a project’s termination. HAD will work with the Agency Administrator on all aspects of provider closeout.
- The Agency Administrator will communicate with HAD of any bed or unit inventory changes within the AP’s projects. At minimum, this will occur annually during the Housing Inventory Count (HIC).

C) DE-CMIS License and User Management

- During HAD's license renewal process, the Agency Administrator will work with agency leadership (if applicable) to provide the number of DE-CMIS licenses needed on behalf of the AP. The number of licenses should be a relative reflection of the number of end users the AP needs for the DE-CMIS contract year. Invoicing will be based on the number of licenses requested by the AP, even if licenses are unused.
- The Agency Administrator understands that additional DE-CMIS licenses can be requested throughout the year by contacting HAD. An additional invoice may be generated to complete this request.
- The Agency Administrator will coordinate the onboarding of new CMIS end users on behalf of the AP. This process will begin by contacting HAD for a User Policy Agreement to be sent to the prospective end user.
- The Agency Administrator should proactively communicate onboarding users, as new user training is dependent on the return of a User Policy Agreement, and time is needed to complete self-paced training courses. Upon the completion of online CMIS training, a follow-up meeting is scheduled within 10 business days where end users will be approved and provided CMIS access.
- The Agency Administrator will ensure that HAD is notified within five (5) business days when a CMIS end user no longer requires a CMIS license due to separation from employment, position transfer, or change in assignment.

D) Oversee DE-CMIS Data Entry and Data Quality

- The responsibility for completeness and accuracy of CMIS reports generated by HAD **is the responsibility of, and dependent upon, the accuracy and quality of the data entered by the subject Agency and its Users.**
 - The Agency Administrator is responsible for checking that all projects are consistently being updated in CMIS through client Entries, Interims, and/or Exits. All data entry guidelines are outlined in the User Policy Agreement.
 - Housing Alliance Delaware recommends that Agency Administrators run Data Quality Framework (DQF) or Annual Performance Report (APR) reports monthly to review data entry and data quality.
-

- Housing Alliance Delaware will periodically send DQFs and/or APRs to the Agency Administrator to initiate data quality review. These reports can be distributed among the AP's end users by the Agency Administrator.
- Housing Alliance Delaware may contact the Agency Administrator to address data quality errors. It is the responsibility of the Agency Administrator to respond to these inquiries, which may require contacting an end user to be involved. HAD will provide guidance to minimize future similar data errors.
- If a custom report is needed to review and/or submit an AP's data, the Agency Administrator must contact HAD with reporting needs.

IV. **AGENCY ADMINISTRATOR CONFIRMATION**

The Agency Administrator must initial each item below to indicate their understanding and acceptance of responsibilities outlined in this Agency Administrator Agreement. Failure to uphold the responsibilities set forth below are grounds for further investigation by Housing Alliance Delaware, which can result in suspension and/or revocation of DE-CMIS access for the AP.

	I have read and understand all policies outlined in the User Policy Agreement, signed by CMIS end users at my agency.
	I understand that by signing this Agreement, I am authorizing all User Policy Agreements for my agency's end users. All signed User Policy Agreements for this contract year were approved by me before being sent to Housing Alliance Delaware.
	I understand that I am responsible for overseeing the work completed by CMIS end users at my agency, including timely, accurate, complete, and consistent data entry, and overall data quality and reporting of my agency's programs/projects in CMIS.
	I understand that I am to contact Housing Alliance Delaware for assistance should I, or any CMIS end user at my agency, need assistance with CMIS in any capacity that I cannot assist with.
	I understand that I am responsible for updating Housing Alliance Delaware with the creation or removal of CMIS logins on behalf of my agency.
	I understand that I am responsible for updating Housing Alliance Delaware with the creation or closing of projects/providers in CMIS on behalf of my agency.

	I understand that I am responsible for updating Housing Alliance Delaware with updates relating to inventory for my agency's projects/programs.
	I understand that I am responsible for data quality inquiries sent by Housing Alliance Delaware to be responded to and addressed. If data quality inquiries cannot be addressed internally, this is to be communicated to Housing Alliance Delaware for further troubleshooting
	I understand that I am responsible for passing along CMIS-related communications and/or duties that I am not responsible for within my agency to the appropriate staff person to respond to. This includes keeping leadership (if applicable) and/or funders (if applicable) of my agency's programs if they are involved with data-related concerns.
	I understand that my agency's logins and passwords cannot be shared and are intended to be used by one staff member within my agency.
	I understand that I must immediately notify Housing Alliance Delaware if I notice or suspect any security or ethic breaches within my agency.

I understand and agree to comply with all statements listed above. **This Agreement, dated September 1, 2023, is valid until September 30, 2024**, a period of 13 months. Thereafter, the Agency Administrator Agreement will be renewed on an annual basis, beginning September 1, 2024. The Agency Administrator Agreement is considered enforced once it is signed by both the AP Agency Administrator and a DE-System Administrator at HAD.

Agency Admin Signature	
Name (Print)	
Agency	
Date	
HAD Admin Signature	
Date Executed	

Appendix C: CMIS User Policy Agreement

DELAWARE COMMUNITY MANAGEMENT INFORMATION SYSTEM (DE-CMIS) CMIS USER POLICY AGREEMENT

The Agency Partner (AP) shall share Client records for the purposes of coordinating services to Clients enrolled in DE-CMIS. In addition, statistical data will be used for reporting unduplicated counts to local, state, federal and other sources. Lastly, DE-CMIS seeks to establish a uniform, consistent, and accurate source of data for all member participants and stakeholders.

The AP shall have rights to the client records pertaining to their clients created or entered by them in DE-CMIS system. The AP shall comply with state and federal confidentiality laws and regulations. The AP agrees to share its Client data with other DE-CMIS Agencies to the extent that the Client has consented to sharing personal information in DE-CMIS upon enrollment.

It is a Client's decision about which information entered into the DE-CMIS system, if any, shall be shared. The DE-CMIS Release of Information (ROI) form must be completed and signed by each Client, even if they do not agree to share information with APs.

I. **DEFINITIONS**

"Agency Administrator" is a designated point of contact within an Agency Partner on DE-CMIS matters.

"Agency Partner" (AP) is party agency entering data in DE-CMIS.

"Housing Alliance Delaware" (HAD) is the legal entity to serve as the DE-CMIS Lead and eligible applicant to HUD.

"Client" is a consumer of services.

"Client records" is any information entered into the DE-CMIS system, including identification, personal characteristics, or circumstances of a particular client.

"Identifying data" is any information that can be used to identify a client, as well as any information that the disclosure of would violate local, state, or federal law. Such information includes, but is not limited to, name, physical address, date of birth, sex, race, marital status, sexual orientation, information regarding household members, Social Security number, housing and homelessness

status, details about cause and timing of that status, employment status, income, or veteran status.

"Release of Information" (ROI) is the documentation in which client provides consent for their information to be entered into DE-CMIS.

Clients Module (CM) is a module in DE-CMIS where Client-level information is entered.

"User" is an Agency Partner employee with approved access to DE-CMIS.

II. **DATA ENTRY**

Minimum data entry actions in DE-CMIS for each consenting Client, including children, will include completing or creating:

- The Client Profile in Clients Module (CM), which includes identifying data, as completely and accurately as possible prior to DE-CMIS project entry.
- A Household in CM, incorporating all family or non-family members entering at the same time into the same Client's household prior to DE-CMIS project entry.
- A ROI entry in CM for each Client or Client's Household prior to DE-CMIS project entry.
- The Entry/Exit for each Client or Client's Household at project entry. While in the Entry/Exit tab, completing the appropriate program-specific entry assessment. There may be additional information to collect within the entry assessment, depending on the project's and the Client's circumstances.
- Interim assessments in CM through the Entry/Exit tab whenever there is a change in a Client's circumstances or those of a Client's Household member.
- Annual update assessments in CM for Clients receiving services through HUD Continuum of Care (CoC) grants, including CoC- and ESG-funded programs. Annual assessments will be completed within a 30-day window either prior to or after date of project entry.
- The exit of Client or Client's Household from the AP project in DE-CMIS and completing the necessary exit assessment from the Entry/Exit tab in this process and in a timely manner.

To the greatest extent possible, data necessary for the development of aggregate reports of homeless services, including services needed, services provided, referrals made, and goals and outcomes of a Client should be entered into the system.

The DE-CMIS is a tool to assist AP in focusing on services and locating alternative resources to serve Clients. Therefore, AP staff should use the Client information in DE-CMIS to track and target services to Clients' needs.

III. **CMIS USER OBLIGATIONS**

The User shall enter Client data into DE-CMIS as accurately and completely as possible.

The User is to contact a DE-CMIS System Administrator at cmis.support@housingalliance.org should they have any issues with maintaining data quality. HAD's CMIS team is available for technical assistance Monday through Friday during business hours.

The User must complete a DE-CMIS Refresher Training per year through TalentLMS. Users must complete a Refresher within ninety (90) days of assignment. Additionally, on-demand training will be available to all Users.

Users are expected to adhere to additional guidelines relating to DE-CMIS data and system usage provided during training.

IV. **USER CODE OF ETHICS**

The User must treat each of their Clients with respect and fairness.

The User must maintain high standards of professional conduct in the use of the system.

The User has primary responsibility for the completeness and accuracy of information entered in DE-CMIS for the AP's Clients.

The User must ensure that Client confidentiality is maintained in the conduct of all AP activities.

V. USER RESPONSIBILITY

A User's ID and Password gives them access to the statewide DE-CMIS system. All Users must **initial each item below** to indicate their understanding and acceptance of the proper use of the User ID and Password as they apply to data privacy and data security. *Failure to uphold the data security and data privacy standards set forth below are grounds for immediate termination from the DE-CMIS system.*

	My User ID and Password are for my use only and must <i>not</i> be shared with anyone.
	It is my responsibility to keep my Password physically secure.
	The only individuals who may view information in the DE-CMIS system are authorized Users and the Clients who the information pertains.
	I may view, obtain, disclose, or use only the database information that is necessary to perform my job.
	When I am finished working with DE-CMIS, I must log off from DE-CMIS before leaving the work area.
	A computer that has DE-CMIS open and running must never be left unattended.
	Failure to log off from DE-CMIS appropriately may result in Client confidentiality and system security.
	Hard copies of DE-CMIS information must be kept in a secure and locked file.
	When hard copies of DE-CMIS information are no longer needed, they must be shredded to maintain confidentiality.
	If I notice or suspect a security or ethical breach, I must immediately the Agency Administrator for DE-CMIS within my Agency and/or a DE-CMIS System Administrator at HAD.
	If I notice or suspect a security or ethical breach committed by the AP Administrator for DE-CMIS, I must immediately notify a DE-CMIS System Administrator at HAD.
	My agency's designated Agency Administrator has authorized my onboarding as a DE-CMIS end user. My agency's designated Agency Administrator has the ability to end my access in DE-CMIS at any time.

I understand and agree to comply with all statements listed above. **This agreement, dated September 1, 2023, is valid until September 30, 2024**, a period of 13 months. Thereafter, the User Policy Agreement will be renewed on an annual basis, beginning September 1, 2024. The User Policy Agreement is considered enforced once it is signed by both the User and a DE-CMIS System Administrator at HAD.

CMIS User's Name (printed)	
Email Address	
Contact Number	
CMIS User Signature	
Date	

HOUSING ALLIANCE DELAWARE SYSTEM ADMINISTRATORS ONLY -	
HAD System Administrator Signature	
Date	

Appendix D: CMIS Data Quality Plan

CMIS Lead Agency

Housing Alliance Delaware

100 West 10th Street Suite 611

Wilmington, Delaware 19801

302-654-0126, Fax 302-351-7258



Delaware Continuum of Care

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 data elements are collected **completely** and reviewed and updated periodically
- Data entry (program entry, interims, exits and follow-ups) is completed in a **timely** fashion
- Data is **consistent** – 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://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2024.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 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 homelessness 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 three (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 homelessness 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 "Data Not Collected", "Information Missing" or (null), "Client Doesn't know," or "Client prefers not to answer" 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 through the HUD Exchange).

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 into 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 third-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 trainings are set up and provided by the CMIS Lead Agency, Housing Alliance Delaware. Housing Alliance Delaware hosts on-demand, self-paced training through TalentLMS, a Learning Management System (LMS).

All CMIS Users are required to complete New User Training and participate in a follow-up meeting prior to accessing CMIS. This helps to ensure understanding of CMIS and higher quality data. All users are also required to participate in Refresher Training annually.

Refresher Training 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 needed.

2. Data Entry Workflows

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 and 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 modified 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, and CMIS End Users 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 End Users are expected to continuously monitor their agency's data quality and make improvements as well.

Agency Administrators are responsible for supporting their staff to complete 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 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 Data Quality Framework report to track errors and help resolve data issues.
Monthly	Review data quality reports internally; Provide tasks and/or suggestions to Agency Admins 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; Discuss ways to improve data quality with Agency Admin.	Review reports with Housing Alliance Delaware for overall improvement of Data Quality.	Review workflow documentation and address questions/concerns to Agency Admin or Housing Alliance Delaware.
Annually	Review and edit training materials and CMIS Policies & Procedures Manual based on updates and requirements set by HUD; Offer CMIS Training as needed; Provide updates to CMIS users about updates and requirements set by HUD.	Review CMIS Policies & Procedures Manual; Sign annual CMIS Agency Partner and Agency Administrator Agreements; Complete annual HIC forms.	Schedule with Housing Alliance Delaware for annual refresher training; sign annual CMIS User Policy 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 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
- Housing Move-In Date (HMID) 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 (4) separate occasions in the last three (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 STANDARDS

<https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

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>

Appendix E: CMIS Fee Schedule

**DE-CMIS Fee Schedule for FY24
(9/1/23 – 8/30/24)**

A. CMIS LISENCE FEES

- a. \$300 – annual fee for 1 CMIS user license.
- b. \$200 – annual fee for 1 ART (advanced reporting, via BusinessObjects) user license.

Agency Partners are billed annually for a period from 9/1 – 8/31. Agency Partners will have a ninety (90) day grace period in which to pay the fee. Fees not paid within the ninety (90) day grace period may result in all agency licenses being suspended. Agencies leaving CMIS in the middle of a contract year will not be refunded for the remainder of the year.

The CMIS Lead Agency has the authority to make changes to the CMIS Fee Schedule as needed to ensure continued successful operation of CMIS.

B. ADDITIONAL CUSTOMIZATIONS AND SERVICES

All CMIS software customization requests are subject to approval by the CMIS Lead Agency. Depending on the request, the CMIS Lead Agency reserves the right to charge fees for customizations beyond the standard scope of work.

C. REACTIVATION

All users are required to keep their CMIS licenses active by frequently logging into the system, regardless of if data needs to be updated in an Agency Partner's projects. Any user not accessing CMIS for more than 90 calendar days will be rendered inactive and potentially deleted. Reactivation of CMIS logins will require completion of assigned CMIS training module(s).

Appendix F: Sample Release of Information

SAMPLE RELEASE OF INFORMATION

**Authorization to Disclose Client
Information**

The U.S. Department of Housing and Urban Development (HUD) requires agencies that receive certain types of HUD funding to use the Homeless Management Information System (HMIS, or in Delaware, Community Homeless Management Information Systems, CMIS). Other funding sources also require program participation in CMIS. This system is not electronically connected to HUD and is only used by authorized Agency Partners. All persons accessing CMIS have received confidentiality training and have signed agreements to protect clients' personal information and limit its use appropriately. The CMIS Privacy Policies and Procedures document is available upon request and is posted on the CMIS Lead website. Any additional data sharing agreements, providing details on how the member agency handles client information beyond the baseline CMIS Privacy Policy, are available at the agency service sites.

I give permission to the agency listed below to collect and enter information into CMIS about me and my household, which includes demographics, picture, health information, and services that I receive from Agency Partners. I understand that data in CMIS is shared with and used by authorized Agency Partners in my community for the purposes of:

- Assessing clients' needs to provide better assistance and to improve their current or future situations.
- Improving the quality of care and service for people in need.
- Tracking the effectiveness of community efforts to meet the needs of people who have received assistance.
- Reporting data on an aggregate level that does not identify specific people or their personal information.

I understand that:

- Signing this release form does not guarantee that I will receive the requested services.
- I have the right to review my CMIS record with an authorized user.
- Unauthorized people or organizations cannot gain access to my information without my consent.
- All agencies that use CMIS will treat my information with respect and in a professional

and confidential manner.

- If I do not sign this form, it will not affect whether or not I can receive services from the agency listed below and any other Agency Partners. However, I would need to contact each such agency directly to apply for assistance and for a determination of eligibility.
- I understand that this authorization shall remain in effect from the date of my signature below and for the length of three (3) calendar years.
- I understand that I may revoke this authorization at any time by notifying the agency listed below in writing. I also understand that the written revocation must be signed and dated later than the date of this authorization. The revocations will not affect any actions taken before the receipt of the written revocation.

My signature below authorizes the agency listed below to enter and potentially release my name, relative personal information, and my need for services and support to necessary individuals or Agency Partners.

Print Client Name	
Client Signature	
Date	

Name of CMIS Agency Partner	
Witness (from CMIS Agency Partner) Signature	
Date	

Appendix G: CMIS Privacy Policies and Procedures

CMIS Privacy Policies and Procedures

The goal of the Community Management Information Systems (hereafter "CMIS") Privacy Policies and Procedures is to ensure confidentiality and security of all client data captured in the CMIS in conformity with all current regulations related to privacy and data confidentiality rights.

Outlined in this document are the Delaware Continuum of Care (CoC) standards and parameters to be followed by all CMIS Agency Partners (AP). The CoC recognizes its Agency Partners may have established their own policies that meet HUD privacy requirements and the CoC standards set forth herein. This CMIS Privacy Policy and Procedure document is not intended to supplant individual AP privacy policies. As long as AP privacy policies and practices meet the thresholds established in this policy and do not contradict the practices described, APs may establish additional or more stringent requirements for CMIS End Users. Additionally, this policy serves to describe how the CMIS Lead Agency meets the privacy requirements established in HUD privacy standards.

Policy Access and Amendment

The CMIS Lead Agency may amend its privacy policy and practices at any time, subject to the recommendation of the CoC System Performance Committee. The CMIS Lead Agency may bring issues to the CoC System Performance Committee as necessary. An amendment may affect data that had been entered in the CMIS before the effective date of any such amendment. This policy is consistent with current privacy standards for CMIS issued by HUD.

This Privacy Policy will be reviewed and amended consistent with the procedure described in the Roles and Responsibilities section of the CoC's CMIS Policies and Procedures.

Applicability

These CMIS Privacy Policies and Procedures apply to the CMIS Lead, APs, and any person accessing CMIS data. AP projects subject to the privacy rules established under the authority of the Health Insurance Portability and Accountability Act (HIPAA) or other more restrictive policies will be honored.

The CMIS Lead Agency and APs will uphold federal and state confidentiality regulations to protect client records and privacy. If an AP is covered by more stringent regulations, such as HIPAA, the more stringent regulations will prevail.

Agency Partner Policy

AP Administrators are responsible for reviewing privacy policies and ensuring consistency with the Delaware CMIS Privacy Policies and Procedures. At times, APs may require more

rigorous privacy standards but they must, at minimum, meet and not contradict the privacy standards set forth herein. In addition, APs must maintain documentation regarding changes to their privacy policies.

Each AP will adopt the standard policy or their own, as long as the policy meets and does not contradict with the privacy standards set forth in this document.

Compliance Review

The CMIS Lead Agency is responsible for ensuring CMIS is operated in accordance with HUD standards. APs are responsible for conducting annual reviews certifying that each participating project complies with the CMIS Privacy Policies and Procedures, and HUD standards. The Delaware CoC, through the CMIS Lead Agency, retains the right to conduct site visits to ensure compliance with these policies and procedures.

- Each Agency will sign CMIS Agency Partner Agreement annually.
- Each Agency will sign at least one CMIS Agency Administrator Agreement annually.
- Each User will sign CMIS User Agreement annually.

Privacy Policy Notice

The CMIS Lead Agency and APs must ensure privacy policies are readily accessible to clients and the public.

Public Access Procedure

The CMIS Lead Agency will post the CMIS Privacy Policy and Procedure on its official website and provide a copy to any individual upon request.

Informed Client Consent Procedure

The CMIS Lead Agency will maintain CMIS data using lawful and fair means. AP privacy policies will include a provision stating the AP will only collect data for Coordinated Entry purposes and/or with the consent of their clients. Any client seeking assistance from an AP will be notified through a signed consent form that data collection will occur. The CMIS Lead Agency will assume that client information in CMIS has been entered with the consent of the client according to these policies and procedures. All APs will keep copies of the signed consents on file. Individual APs may maintain stricter policies relating to client consent to collect and share data with the CMIS Lead Agency.

Accessibility Procedure

Each AP that is a recipient of federal assistance will provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the organization.

APs must make reasonable accommodations for persons with disabilities throughout the consent, intake, and data collection processes. This may include, but is not limited to, providing qualified sign language interpreters, readers, or materials in accessible formats

such as Braille, audio, or large type as needed by the individual with a disability.

CMIS Data Use and Disclosure

The confidentiality of CMIS data will be protected. APs must collect data by legal and fair means, consistent with these policies and procedures. The CMIS Lead Agency and APs may only collect, use, and disclose data for the specific purposes and reasons defined in this section.

The CMIS Lead Agency collects CMIS data from organizations that directly enter data into CMIS with the knowledge and authority of the CoC System Performance Committee. CMIS data may only be collected, used, or disclosed for activities described in this section. The CMIS Lead Agency requires that APs notify individuals seeking their assistance that data collection, use, and disclosure will occur. By entering data into CMIS, the AP verifies that individuals have provided the AP with consent to use and disclose their data for purposes described below and for other uses and disclosures the CMIS Lead Agency determines to be compatible:

- For functions relating to Coordinated Entry, which include triage and problem-solving completed by Centralized Intake within Housing Alliance Delaware;
- To provide or coordinate individual referrals, case management, housing, or other services. Client records may be shared with other organizations that may have separate privacy policies and that may allow different uses and disclosures of the information;
- For functions related to payment or reimbursement for services;
- To carry out administrative functions, including but not limited to audit, personnel oversight, and management functions;
- To produce aggregate-level reports regarding use of services;
- To produce aggregate-level reports for funders or grant applications;
- To create de-identified (anonymous) information;
- To track system-wide and project-level outcomes;
- To identify unfilled service needs and plan for the provision of new services;
- To conduct a study or research project approved by the CoC;
- When required by law (to the extent that use or disclosure complies with and is limited to the requirements of the law).

Entities providing funding to organizations or projects required to use CMIS will not have automatic access to CMIS. Funding for any organization or project using CMIS cannot be contingent upon establishing a voluntary written agreement allowing the funder CMIS access.

Before any use or disclosure of Personal Identifying Information (PII) that is not described here is made, the CMIS Lead Agency or AP wishing to make the disclosure will seek the consent of all individuals whom PII may be used or disclosed.

Access and Correction

Clients whose data is collected in CMIS may inspect and receive a copy of their CMIS record by requesting it from the AP that originally collected the information. The CMIS Lead Agency requires the AP to establish a policy to manage such requests and to explain any information a client may not understand.

Each AP privacy policy will describe how requests from clients for correction of inaccurate or incomplete CMIS records are handled. The policy will allow clients to request their CMIS data or request the data be removed from the CMIS. Nothing in this section is intended to indicate that an AP is released from any obligation by any funder to collect required data elements.

If a client requests to have his or her information in the CMIS corrected or removed, and the AP agrees that the information is inaccurate or incomplete, they may delete it or they may choose to mark it as inaccurate or incomplete and to supplement it with additional information. Any such corrections applicable to the data stored in the CMIS system will be corrected within one week of the request date.

In the event that a client requests to view his or her data in the CMIS, the AP CMIS Administrator will keep a record of such requests and any access granted. The AP CMIS Administrator or AP Case Manager will provide a copy of the requested data within a reasonable timeframe to the client.

APs are permitted to establish reasons for denying client requests for inspection of CMIS records. These reasons are limited to the following:

- If the information was compiled in reasonable anticipation of litigation or comparable proceedings;
- If the record contains information about another client or individual (other than a healthcare provider or homeless provider) and the denial is limited to the section of the record containing such information;
- If the information was obtained under a promise of confidentiality (other than a promise from a healthcare provider or homeless provider) and if the disclosure would reveal the source of the information;
- Disclosure of the information would be reasonably likely to endanger the life or physical safety of an individual.

If an AP denies a request for access or correction, the AP will explain the reason for the denial. The AP will also maintain documentation of the request and the reason for the denial. APs may reject repeated or harassing requests for access to or correction of a CMIS record. APs are to document this and send a copy of the document to CMIS Lead Agency for filing.

Data Retrieval and Sharing

CMIS, as implemented by the Delaware CoC, is a system that will generate reports required by HUD, the CoC, and other stakeholders at a level that does not identify individuals but can provide accurate statistical data, such as numbers served, and trend assessments based on data entered by APs. Data from CMIS will be used to produce CoC and local level statistical reports as well as corresponding reports.

The CMIS Lead Agency staff has access to retrieve all data in CMIS. The CMIS Lead Agency will protect client confidentiality in all reporting.

APs may share PII with each other for the purposes of determining eligibility and coordinating client services once an agreed upon Release of Information is in place, as outlined in the Data Policies and Procedures section of the CoC's CMIS Policies and Procedures.

APs may also retrieve CMIS data entered to produce statistical reports including number of clients served and trend assessments for internal purposes, grant applications, and other required reports, within the parameters established by the CMIS Lead Agency.