

## Before Starting the CoC Application

The CoC Consolidated Application is made up of three parts: the CoC Application, the Project Listing, and the Project Applications. The Collaborative Applicant is responsible for submitting two of these sections. In order for the CoC Consolidated Application to be considered complete, each of these two sections **REQUIRES SUBMISSION**:

- CoC Application
- Project Listing

Please Note:

- Review the FY2013 CoC Program NOFA in its entirety for specific application and program requirements.
- Use the CoC Application Detailed Instructions while completing the application in e-snaps. The detailed instructions are designed to assist applicants as they complete the application forms in e-snaps.
- As a reminder, CoCs are not able to import data from the 2012 application due to significant changes to the CoC Application questions. All parts of the application must be fully completed.
- All questions marked with an asterisk (\*) are mandatory and must be completed in order to submit the application.

For Detailed Instructions click [here](#).

## **1A. Continuum of Care (CoC) Identification**

### **Instructions:**

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**1A-1 CoC Name and Number:** NY-501 - Elmira/Steuben, Allegany, Livingston, Chemung, Schuyler Counties CoC

**1A-2 Collaborative Applicant Name:** Institute for Human Services, Inc.

**1A-3 CoC Designation:** CA

## 1B. Continuum of Care (CoC) Operations

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**1B-1 How often does the CoC conduct meetings of the full CoC membership?** Quarterly

**1B-2 How often does the CoC invite new members to join the CoC through a publicly available invitation?** Quarterly

**1B-3 Does the CoC include membership of a homeless or formerly homeless person?** Yes

**1B-4 For members who are homeless or formerly homeless, what role do they play in the CoC membership?** Advisor, Community Advocate, Organizational employee  
Select all that apply.

**1B-5 Does the CoC's governance charter incorporate written policies and procedures for each of the following:**

1B-5.1 Written agendas of CoC meetings?	Yes
1B-5.2 Centralized or Coordinated Assessment System?	Yes
1B-5.3 Process for Monitoring Outcomes of ESG Recipients?	No
1B-5.4 CoC policies and procedures?	Yes
1B-5.5 Written process for board selection?	Yes
1B-5.6 Code of conduct for board members that includes a recusal process?	Yes
1B-5.7 Written standards for administering assistance?	Yes

## 1C. Continuum of Care (CoC) Committees

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**1C-1 Provide information for up to five of the most active CoC-wide planning committees, subcommittees, and/or workgroups, including a brief description of the role and the frequency of meetings. Collaborative Applicants should only list committees, subcommittees and/or workgroups that are directly involved in CoC-wide planning, and not the regular delivery of services.**

	Name of Group	Role of Group (limit 750 characters)	Meeting Frequency	Names of Individuals and/or Organizations Represented
1C-1.1	NY-501 CoC Board	The CoC Board works with the Lead Agency to coordinate CoC planning activities. Key responsibilities include: overseeing the operation of the CoC; coordinating the annual CoC application; reviewing CoC operating policies; leading 10-year planning efforts; assessing and recommending prioritization of projects to the full CoC body; and evaluating project performance.	Monthly	Steuben, Chemung, Livingston, Schuyler, & Allegany Co. DSS agencies, IHS, Chances & Changes, CASA, Arbor Development, Catholic Charities Chemung, Catholic Charities Schuyler, formerly homeless Advocate, City of Elmira, and others
1C-1.2	HMIS Advisory Committee	The HMIS Advisory Committee oversees the continuing development of a regional HMIS system, including training of agency personnel, monitoring of data entry/management, HMIS and data integrity policy, AHAR participation, and system integrity. While only formally convening twice a year, the committee meets on an Ad Hoc basis to consider and approve changes to policy.	Semi-Annually	Arbor Development, Catholic Charities Chemung, Catholic Charities Schuyler, Chances & Changes, IHS, Catholic Charities Steuben
1C-1.3	SOAR Planning Team	The SOAR (SSI/SSDI Outreach, Access, and Recovery) team provides strategic and goal oriented planning for the Continuum's SOAR deployment program. It also considers matters of accessibility to mainline benefits including TANF, SNAP, AHA, Medicare/Medicaid, and other social service safety net supportive services.	Quarterly	Steuben DSS, Livingston DSS, IHS, Chances & Changes, Arbor Housing, Catholic Charities Chemung, Catholic Charities Livingston, Catholic Charities Steuben, Legal Asst. of Western NY, Bath VAMC, St. Joseph's Hosp., NYS OTDA, Chemung Co. Mental Health

1C-1.4	Strategic Planning Team(s)	The NY-501 Strategic Planning Team is comprised of 3 core teams that work to develop policy in the following areas: Coordinated Assessment, CoC Resources, and Affordable Housing. The groups collaborate with each other and provide information to assist in planning and service delivery areas. The overall team meets as a quarterly joint function of the NY-501 Board.	Quarterly	Steuben, Chemung, Livingston, Schuyler, & Allegany Co. DSS agencies, IHS, Chances & Changes, CASA, Arbor Development, Catholic Charities Chemung, Catholic Charities Schuyler, formerly homeless Advocate, City of Elmira, and others
1C-1.5	PIT Committee	The Point-in-Time Committee plans and implements an annual point-in-time study in partnership with numerous regional agencies and volunteers, and also is responsible for developing information and data that assists in directing outreach initiatives to the proper geographic areas.	Semi-Annually	Steuben, Livingston, & Chemung DSS; IHS; Chances & Changes; Arbor Housing; Catholic Charities Chemung, Livingston, Schuyler, Steuben; LawNY, Bath VAMC, Trillium., Red Cross, Corning Community College

**1C-2 Describe how the CoC considers the full range of opinions from individuals or organizations with knowledge of homelessness or an interest in preventing and ending homelessness in the geographic area when establishing the CoC-wide committees, subcommittees, and workgroups.  
(limit 750 characters)**

Each county of the Continuum has a housing and homelessness task force that meets at least quarterly. The CoC lead agency participates in these meetings, bringing discussion items to the table and engaging on overall community, economic, and affordable housing initiatives within the county. Representation is broad based, and includes stakeholders from providers to elected officials. The CoC invites participants to join the CoC membership and its committees, and regularly creates specific committees and planning task forces comprised of members of these county level groups. Additionally, the CoC partners with other agencies to facilitate community wide focus groups which are advertised and open to all.

## 1D. Continuum of Care (CoC) Project Review, Ranking, and Selection

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**1D-1 Describe the specific ranking and selection process the CoC uses to make decisions regarding project application review and selection, based on objective criteria. Written documentation of this process must be attached to the application along with evidence of making the information publicly available.  
(limit 750 characters)**

Project applicants are required to submit to the Lead Agency their applications by an internal deadline. Along with this, they complete a Project Summary sheet, and a project leveraging worksheet. These are grouped by HUD priority type (PSH, TH, HMIS, SSO) and sent to the ranking team.

The ranking team grades each application in priority type groups, which allows for a maximum score of 75. Projects are then ranked by score in each of the HUD categories. The resulting list is then sent back to the Lead Agency. This list is then approved by a vote of the full CoC membership at a public meeting. Applicants are notified of their rank, and the result posted on the CoC Website at <http://www.ihsnet.org/pages.asp?catid=22>

**1D-2 Describe how the CoC reviews and ranks projects using periodically collected data reported by projects, conducts analysis to determine each project's effectiveness that results in participants rapid return to permanent housing, and takes into account the severity of barriers faced by project participants. Description should include the specific data elements and metrics that are reviewed to do this analysis.  
(limit 1000 characters)**

The FY2013 process only considered renewal applications due to the sequestration. Prior to presentation to the ranking team, the Lead Agency pre-screened each project against the following criteria: Met FY2012 APR Benchmarks; Timely drawdown of funds; No adverse HUD findings; Project data quality >90%. Each element was assigned 5 points by the team. Project types were ranked in scoring priority groups, PSH, TH, HMIS.

Further points were given for chronic priority >85%, leveraging >150%, project size, serve CoC identified target pops, disabled and chronic priority, fills critical housing needs, PH remaining >75% over 6m, transitional showing >80% to PH. This data was provided by annual project APR and HMIS metrics. Any tie would be settled by community need and population served. This is passed to a full meeting of the CoC Board and General Membership for approval. Direct notification to grantees is made and results posted to website at <http://www.ihsnet.org/pages.asp?catid=22>

**1D-3 Describe the extent in which the CoC is open to proposals from entities that have not previously received funds in prior Homeless Assistance Grants competitions.  
(limit 750 characters)**

Throughout the year, the CoC Lead Agency assesses housing and supportive service gaps within the continuum, and networks with existing and prospective member agencies to encourage new applications. Organizations which are not members are invited to attend CoC meetings and participate in various workgroups. Those that apply for membership are apprised of the application process and timeline and offered technical assistance in their development of initiatives that meet CoC Program funding guidelines and fulfill identified local needs.

**1D-4 On what date did the CoC post on its website all parts of the CoC Consolidated Application, including the Priority Listings with ranking information and notified project applicants and stakeholders the information was available? Written documentation of this notification process (e.g., evidence of the website where this information is published) must be attached to the application.**

02/03/2014

**1D-5 If there were changes made to the ranking after the date above, what date was the final ranking posted?**

**1D-6 Did the CoC attach the final GIW approved by HUD either during CoC Registration or, if applicable, during the 7-day grace period following the publication of the CoC Program NOFA without making changes?**

Yes

**1D-6.1 If no, briefly describe each of the specific changes that were made to the GIW (without HUD approval) including any addition or removal of projects, revisions to line item amounts, etc. For any projects that were revised, added, or removed, identify the applicant name, project name, and grant number.  
(limit 1000 characters)**

Not Applicable

**1D-7 Were there any written complaints received by the CoC in relation to project review, project selection, or other items related to 24 CFR 578.7 or 578.9 within the last 12 months?** No

**1D-7.1 If yes, briefly describe the complaint(s), how it was resolved, and the date(s) in which it was resolved. (limit 750 characters)**

Not Applicable



## **1E. Continuum of Care (CoC) Housing Inventory**

### **Instructions:**

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**1E-1 Did the CoC submit the 2013 HIC data in No  
the HDX by April 30, 2013?**

## 2A. Homeless Management Information System (HMIS) Implementation

### Intructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

### 2A-1 Describe how the CoC ensures that the HMIS is administered in compliance with the CoC Program interim rule, conformance with the 2010 HMIS Data Standards and related HUD Notices. (limit 1000 characters)

The CoC Lead Agency consults regularly with the HMIS Lead Agency to communicate any changes in regulation, or dynamics within the Continuum that may affect performance, data consistency, or the manner of utilization for the end user of the HMIS software. Both the HMIS Administrator and CoC Director work collaboratively on new documentation and practice to ensure that both practice and language reflect the intents and purposes of the Data Standards and implementation under the CoC Program Interim Rule. Additionally, both agencies regularly review industry training, reviews, practice literature, and best practices to maintain compliance and shape future development of the enterprise HMIS platform. Regular data quality and service reports are generated and evaluated to identify any issues in maintaining a quality HMIS platform, and to monitor for quality standards imposed by applicable regulation.

### 2A-2 Does the governance charter in place between the CoC and the HMIS Lead include the most current HMIS requirements and outline the roles and responsibilities of the CoC and the HMIS Lead? If yes, a copy must be attached.

Yes

### 2A-3 For each of the following plans, describe the extent in which it has been developed by the HMIS Lead and the frequency in which the CoC has reviewed it: Privacy Plan, Security Plan, and Data Quality Plan. (limit 1000 characters)

In our CoC, much of the HMIS required documentation is written in a collaborative manner between the HMIS Administrator and the CoC Director. For the guidance policy on Privacy & Security, the CoC lead wrote the draft with documents prepared by the HMIS lead. Both then collaborated and the document was reviewed by the HMIS Committee. The Data Quality plan was written by the HMIS lead, and sent for review to the CoC Lead and HMIS Committee. Both the Lead Agencies regularly review pertinent best practices and monitor regulatory or guidance changes. These are then incorporated into the working policies. This occurs regularly throughout the year, and the CoC Lead Agency conducts a formal annual review of all practice, policy, and guidance documents used by the CoC or in its operations.

**2A-4 What is the name of the HMIS software selected by the CoC and the HMIS Lead?** AWARDS  
**Applicant will enter the HMIS software name (e.g., ABC Software).**

**2A-5 What is the name of the HMIS vendor?** Foothold Technology  
**Applicant will enter the name of the vendor (e.g., ESG Systems).**

**2A-6 Does the CoC plan to change the HMIS software within the next 18 months?** No

## 2B. Homeless Management Information System (HMIS) Funding Sources

**2B-1 Select the HMIS implementation coverage area:** Single CoC

**2B-2 Select the CoC(s) covered by the HMIS:** NY-501 - Elmira/Steuben, Allegany, Livingston, Chemung, Schuyler Counties CoC  
(select all that apply)

**2B-3 In the chart below, enter the amount of funding from each funding source that contributes to the total HMIS budget for the CoC.**

### 2B-3.1 Funding Type: Federal - HUD

Funding Source	Funding
CoC	\$153,426
ESG	\$0
CDBG	\$0
HOME	\$0
HOPWA	\$0
Federal - HUD - Total Amount	\$153,426

### 2B-3.2 Funding Type: Other Federal

Funding Source	Funding
Department of Education	\$0
Department of Health and Human Services	\$0
Department of Labor	\$0
Department of Agriculture	\$0
Department of Veterans Affairs	\$0
Other Federal	\$0
Other Federal - Total Amount	\$0

### 2B-3.3 Funding Type: State and Local

Funding Source	Funding
City	\$0
County	\$0
State	\$0
State and Local - Total Amount	\$0

### 2B-3.4 Funding Type: Private

Funding Source	Funding
Individual	\$0
Organization	\$38,356
Private - Total Amount	\$38,356

### 2B-3.5 Funding Type: Other

Funding Source	Funding
Participation Fees	\$0
Other - Total Amount	\$0

2B-3.6 Total Budget for Operating Year	\$191,782
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### 2B-4 How was the HMIS Lead selected by the CoC? Agency Volunteered

**2B-4.1 If other, provide a description as to how the CoC selected the HMIS Lead.  
(limit 750 characters)**

Not Applicable

## 2C. Homeless Management Information System (HMIS) Bed Coverage

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**2C-1 Indicate the HMIS bed coverage rate (%) for each housing type within the CoC. If a particular housing type does not exist anywhere within the CoC, select "Housing type does not exist in CoC" from the drop-down menu:**

* Emergency shelter	86%+
* Safe Haven (SH) beds	Housing type does not exist in CoC
* Transitional Housing (TH) beds	76-85%
* Rapid Re-Housing (RRH) beds	86%+
* Permanent Supportive Housing (PSH) beds	86%+

**2C-2 How often does the CoC review or assess its HMIS bed coverage?** Annually

**2C-3 If the bed coverage rate for any housing type is 64% or below, describe how the CoC plans to increase this percentage over the next 12 months.  
(limit 1000 characters)**

Not Applicable

**2C-4 If the Collaborative Applicant indicated that the bed coverage rate for any housing type was 64% or below in the FY2012 CoC Application, describe the specific steps the CoC has taken to increase this percentage.  
(limit 750 characters)**

Not Applicable, all were at 76% or above, with most at 86% plus.

## 2D. Homeless Management Information System (HMIS) Data Quality

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**2D-1 For each housing type, indicate the average length of time project participants remain in housing. If a housing type does not exist in the CoC, enter "0".**

Type of Housing	Average Length of Time in Housing
Emergency Shelter	38
Transitional Housing	206
Safe Haven	0
Permanent Supportive Housing	269
Rapid Re-housing	109

**2D-2 Indicate the percentage of unduplicated client records with null or missing values on a day during the last 10 days of January 2013 for each Universal Data Element listed below.**

Universal Data Element	Percentage
Name	0%
Social security number	0%
Date of birth	0%
Ethnicity	0%
Race	0%
Gender	0%
Veteran status	1%
Disabling condition	0%
Residence prior to program entry	0%
Zip Code of last permanent address	1%
Housing status	0%
Head of household	0%

**2D-3 Describe the extent in which HMIS generated data is used to generate HUD required reports (e.g., APR, CAPER, etc.). (limit 1000 characters)**

For the NY-501 Regional CoC, our HMIS is the primary source of real time and historic data. It is utilized in the submission of the annual AHAR, both the PIT & HIC, the CoC Checkup and any required APR. HMIS platform data is used by CoC Program grantees to provide metrics for their APR submissions—and any requests for information made by the regional HUD Field Office.

**2D-4 How frequently does the CoC review the data quality in the HMIS of program level data?** Quarterly

**2D-5 Describe the process through which the CoC works with the HMIS Lead to assess data quality. Include how the CoC and HMIS Lead collaborate, and how the CoC works with organizations that have data quality challenges.  
(Limit 1000 characters)**

HMIS staff have developed and deployed several data quality reports in collaboration with the CoC Lead Agency which are generated to inform the program staff of the data quality issues, and advise the CoC of any issues. These reports are used for collaborative discussions between the Lead Agencies and HMIS platform users for process improvement and planning. In addition, the CoC Director is on-site monthly at the HMIS Lead Agency site and engages in discussion with the HMIS Administrator for performance status and planning. The HMIS staff has also written technical assistance documents and presentations showing users how to avoid and correct data quality errors. The HMIS staff also regularly offers trainings on the best HMIS practices and data quality for HMIS users, and continually use this material when revising procedures and educating users.

**2D-6 How frequently does the CoC review the data quality in the HMIS of client-level data?** Monthly



## 2E. Homeless Management Information System (HMIS) Data Usage and Coordination

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

### 2E-1 Indicate the frequency in which the CoC uses HMIS data for each of the following activities:

* Measuring the performance of participating housing and service providers	Quarterly
* Using data for program management	Monthly
* Integration of HMIS data with data from mainstream resources	Quarterly
* Integration of HMIS data with other Federal programs (e.g., HHS, VA, etc.)	Never

## **2F. Homeless Management Information System (HMIS) Policies and Procedures**

### **Instructions:**

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**2F-1 Does the CoC have a HMIS Policy and Procedures Manual? If yes, the HMIS Policy and Procedures Manual must be attached.** Yes

**2F-1.1 What page(s) of the HMIS Policy and Procedures Manual or governance charter includes the information regarding accuracy of capturing participant entry and exit dates in HMIS? (limit 250 characters)**

Pages 9 & 10 of the Data Quality Plan which is part of the overall STEPS HMIS Standard Operating Procedures manual. 22 of the SOP also references the timely input of entry and exit dates.

**2F-2 Are there agreements in place that outline roles and responsibilities between the HMIS Lead and the Contributing HMIS Organizations (CHOs)?** Yes

## 2G. Continuum of Care (CoC) Sheltered Homeless Point-in-Time (PIT) Count

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**2G-1** Indicate the date of the most recent sheltered point-in-time count (mm/dd/yyyy): 01/30/2013

**2G-2** If the CoC conducted the sheltered point-in-time count outside of the last 10 days of January 2013, was an exception granted by HUD? Not Applicable

**2G-3** Enter the date the CoC submitted the sheltered point-in-time count data in HDX: 07/04/2013

### 2G-4 Indicate the percentage of homeless service providers supplying sheltered point-in-time data:

Housing Type	Observation	Provider Shelter	Client Interview	HMIS
Emergency Shelters	0%	3%	0%	97%
Transitional Housing	0%	2%	0%	98%
Safe Havens	0%	0%	0%	0%

**2G-5** Comparing the 2012 and 2013 sheltered point-in-time counts, indicate if there was an increase, decrease, or no change and then describe the reason(s) for the increase, decrease, or no change. (Limit 750 characters)

The Continuum only saw a 13.6% (21 persons) increase in the total number of homeless residing in transitional and emergency housing, and a decrease of 1 person in ES from the 2012 count. Other indicators in the PIT establish a trend toward more families experiencing homelessness due to economic changes and a decline of unsheltered chronic homeless. This is best explained by regional economic changes (under/unemployment), and a shortage of affordable, permanent housing in the region driven by rising rents—resulting in longer TH stays while awaiting PH availability.

## 2H. Continuum of Care (CoC) Sheltered Homeless Point-in-Time (PIT) Count: Methods

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**\* 2H-1 Indicate the method(s) used to count sheltered homeless persons during the 2013 point-in-time count:**

Survey providers:	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Extrapolation:	<input type="checkbox"/>
Other:	<input type="checkbox"/>

**2H-2 If other, provide a detailed description.  
(limit 750 characters)**

Not Applicable

**2H-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the sheltered homeless population during the 2013 point-in-time count was accurate.  
(limit 750 characters)**

The CoC's 2012 PIT was facilitated by nearly 100 agency staff and community volunteers. In housing agencies, the PIT survey was used to collect additional data from clients to supplement CoC analysis. Fieldwork was used in with HMIS sheltered data, as a number of sheltered homeless reside in programs that do not participate in the HMIS, or are at motels paid for by church groups.

For community-agency surveys, staff and volunteers received training prior to the event. Methods using names, birthdate, and age were used to create a deduplication code. As a further deduplication technique, all surveys were entered into an Access survey database, the interface of which would not permit a survey to be submitted if a duplicate code existed.

## 2I. Continuum of Care (CoC) Sheltered Homeless Point-in-Time (PIT) Count: Data Collection

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**\* 2I-1 Indicate the methods used to gather and calculate subpopulation data for sheltered homeless persons:**

HMIS:	<input checked="" type="checkbox"/>
HMIS plus extrapolation:	<input type="checkbox"/>
Sample of PIT interviews plus extrapolation:	<input type="checkbox"/>
Sample strategy: (if Sample of PIT interviews plus extrapolation is selected)	
Provider expertise:	<input type="checkbox"/>
Interviews:	<input checked="" type="checkbox"/>
Non-HMIS client level information:	<input checked="" type="checkbox"/>
Other:	<input type="checkbox"/>

**2I-2 If other, provide a detailed description.  
(limit 750 characters)**

Not Applicable

**2I-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the sheltered homeless population count during the 2013 point-in-time count was accurate.  
(limit 750 characters)**

The region's shelter/housing providers completed survey forms on each of their clients either through personal interview or using qualifying HMIS information. Agency staff recorded sub-population data on each client, utilizing the CoC's established Point in Time survey form. All HMIS reporting housing agencies participated in the study, as did programs that do not participate in the HMIS. All agency staff received training prior to the event, including instruction on the various sub-populations. Additionally, the survey form utilized a unique identifying code for each client, ensuring that the subpopulation counts are unduplicated.

## 2J. Continuum of Care (CoC) Sheltered Homeless Point-in-Time Count: Data Quality

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

### \* 2J-1 Indicate the methods used to ensure the quality of the data collected during the sheltered point-in-time count:

Training:	<input checked="" type="checkbox"/>
Follow-up	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Non-HMIS de-duplication :	<input checked="" type="checkbox"/>
Other:	<input type="checkbox"/>

### 2J-2 If other, provide a detailed description. (limit 750 characters)

Not Applicable

### 2J-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the sheltered homeless population count during the 2013 point-in-time count was accurate. (limit 750 characters)

The CoC has developed training materials to promote accurate documentation, and conducted a series of workshops for agency staff and community volunteers throughout the region within the 7 days prior to survey date. 24-hour technical assistance was available during the count through the region's 2-1-1 Helpline, and the coordinator provided email or phone updates to promote accurate use of the surveys during the count. HMIS agencies used HMIS data to complete and/or verify survey information for each client. A de-duplication coding system of the survey form (first name/last initial/birth month & year), and the use of an electronic survey recording/data program, ensured unduplicated recording on the region's sheltered populations.

## 2K. Continuum of Care (CoC) Unsheltered Homeless Point-in-Time (PIT) Count

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**2K-1 Indicate the date of the most recent unsheltered point-in-time count:** 01/30/2013

**2K-2 If the CoC conducted the unsheltered point-in-time count outside of the last 10 days of January 2013, was an exception granted by HUD?** Not Applicable

**2K-3 Enter the date the CoC submitted the unsheltered point-in-time count data in HDX:** 07/04/2013

**2K-4 Comparing the 2013 unsheltered point-in-time count to the last unsheltered point-in-time count, indicate if there was an increase, decrease, or no change and describe the specific reason(s) for the increase, decrease, or no change. (limit 750 characters)**

The difference between the 2012 and 2013 unsheltered count represented an increase of 23 individuals. Although the number of single homeless decreased by 15, there was an increase of 21 total persons in the family universe. Correlated against other survey information garnered at the time of the PIT from respondents, adults related the economic downturn and loss of their employment as the primary contributing factor to their homelessness.

## 2L. Continuum of Care (CoC) Unsheltered Point-in-Time Count: Methods

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**\* 2L-1 Indicate the methods used to count unsheltered homeless persons during the 2013 point-in-time count:**

Public places count:	<input type="checkbox"/>
Public places count with interviews on the night of the count:	<input checked="" type="checkbox"/>
Public places count with interviews at a later date:	<input checked="" type="checkbox"/>
Service-based count:	<input checked="" type="checkbox"/>
HMIS:	<input type="checkbox"/>
Other:	<input type="checkbox"/>

**2L-2 If other, provide a detailed description. (limit 750 characters)**

Not Applicable

**2L-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the unsheltered homeless population during the 2013 point-in-time count was accurate. (limit 750 characters)**

Following required training, community volunteers utilized a standardized survey form to interview the homeless at service locations (food pantries, soup kitchens, etc.) and in public places (parks, bus stations, etc.). All surveyed were asked where they spent the night of the PIT, and the volunteers confirmed with the person that location. Those identified as unsheltered included only those who met the qualifying options for that type. The unduplicated counts queried individuals on the night of the count and further interviews at other locations during the next few days, with no sampling or extrapolation.



## **2M. Continuum of Care (CoC) Unsheltered Homeless Point-in-Time Count: Level of Coverage**

### **Instructions:**

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**2M-1 Indicate where the CoC located unsheltered homeless persons during the 2013 point-in-time count:** A Combination of Locations

**2M-2 If other, provide a detailed description.  
(limit 750 characters)**

Not Applicable

## 2N. Continuum of Care (CoC) Unsheltered Homeless Point-in-Time Count: Data Quality

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**\* 2N-1 Indicate the steps taken by the CoC to ensure the quality of the data collected for the 2013 unsheltered population count:**

Training:	<input checked="" type="checkbox"/>
"Blitz" count:	<input type="checkbox"/>
Unique identifier:	<input checked="" type="checkbox"/>
Survey question:	<input checked="" type="checkbox"/>
Enumerator observation:	<input type="checkbox"/>
Other:	<input type="checkbox"/>

**2N-2 If other, provide a detailed description.  
(limit 750 characters)**

Not Applicable

**2N-3 For each method selected, including other, describe how the method was used to reduce the occurrence of counting unsheltered homeless persons more than once during the 2013 point-in-time count. In order to receive credit for any selection, it must be described here.  
(limit 750 characters)**

All staff and community volunteers conducting surveys for the PIT participated in survey training. Staff and volunteers developed an understanding of the expectation, reasons, and techniques for conducting an accurate unduplicated count of unsheltered homeless persons. All surveys were done through an interview process using a standard survey form and asked for each participant's first name, last initial, birth month & year. This resulted in a unique code for each respondent (e.g., RobertM0484"), to be used to identify duplicate surveys. As a further deduplication technique, all surveys were entered into a survey database, the interface of which would not permit a survey to be submitted if a record with a duplicate code already existed.

## 3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

### Objective 1: Increase Progress Towards Ending Chronic Homelessness

#### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY 2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). The first goal in Opening Doors is to end chronic homelessness by 2015. Creating new dedicated permanent supportive housing beds is one way to increase progress towards ending homelessness for chronically homeless persons. Using data from Annual Performance Reports (APR), HMIS, and the 2013 housing inventory count, complete the table below.

#### 3A-1.1 Objective 1: Increase Progress Towards Ending Chronic Homelessness

	Proposed in 2012 CoC Application	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-1.1a For each year, provide the total number of CoC-funded PSH beds not dedicated for use by the chronically homeless that are available for occupancy.		369	368	368
3A-1.1b For each year, provide the total number of PSH beds dedicated for use by the chronically homeless.	32	33	33	33
3A-1.1c Total number of PSH beds not dedicated to the chronically homeless that are made available through annual turnover.		147	146	146
3A-1d Indicate the percentage of the CoC-funded PSH beds not dedicated to the chronically homeless made available through annual turnover that will be prioritized for use by the chronically homeless over the course of the year.		85%	85%	85%
3A-1.1e How many new PSH beds dedicated to the chronically homeless will be created through reallocation?		0	0	0

**3A-1.2 Describe the CoC's two year plan (2014-2015) to increase the number of permanent supportive housing beds available for chronically homeless persons and to meet the proposed numeric goals as indicated in the table above. Response should address the specific strategies and actions the CoC will take to achieve the goal of ending chronic homelessness by the end of 2015.**

**(limit 1000 characters)**

Given the decrease in chronic homelessness in the region in favor of family homelessness as a result of economic downturns, this expansion is viewed as adequate to Continuum needs during the 2013 year. The projected number of 33 beds is based on data which shows a small number entering the system are chronically homeless. We are a rural CoC, and do not share the same issues of chronic homelessness as metro areas. CoC Program PSH programs have prioritized 85% of their inventory to chronic housing, assuring that with turnover and demand, chronic beds will be available.

Those placed into PSH tend to remain housed and not re-experience homelessness. The creation of new affordable housing by private investment, an increase in VASH vouchers and existing PSH capacity is sufficient for the Continuum to quickly absorb new chronic homeless into the network. The CoC will monitor needs, and adapt to future changes through possible reallocation of existing units to meet any demands.

**3A-1.3 Identify by name the individual, organization, or committee that will be responsible for implementing the goals of increasing the number of permanent supportive housing beds for persons experiencing chronic homelessness.**

**(limit 1000 characters)**

CoC Lead Agency, Chances & Changes, Arbor Development, Catholic Charities Chemung, Catholic Charities Steuben, Bath VAMC, NYS OTDA

## 3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

### Objective 2: Increase Housing Stability

#### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Achieving housing stability is critical for persons experiencing homelessness. Using data from Annual Performance Reports (APR), complete the table below.

**3A-2.1 Does the CoC have any non-HMIS projects for which an APR should have been submitted between October 1, 2012 and September 30, 2013?** Yes

#### 3A-2.2 Objective 2: Increase Housing Stability

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-2.2a Enter the total number of participants served by all CoC-funded permanent supportive housing projects as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013:	369	370	370
3A-2.2b Enter the total number of participants that remain in CoC-funded funded PSH projects at the end of the operating year PLUS the number of participants that exited from all CoC-funded permanent supportive housing projects to a different permanent housing destination.	265	292	317
3A-2.2c Enter the percentage of participants in all CoC-funded projects that will achieve housing stability in an operating year.	72%	78%	85%

**3A-2.3 Describe the CoC's two year plan (2014-2015) to improve the housing stability of project participants in CoC Program-funded permanent supportive housing projects, as measured by the number of participants remaining at the end of an operating year as well as the number of participants that exited from all CoC-funded permanent supportive housing projects to a different permanent housing destination. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit to 1000 characters)**

In 2013, 72% of those in PSH housing that the 'leaver' population could be accounted for remained in PSH or transitioned to other types of permanent housing. The NY-501 houses a very high number of SPMI and SPSA clients. Unaccounted for leavers simply depart from their housing with little or no notice, and others refuse to disclose their new housing destination. The CoC will continue to monitor the exit rates from PSH through the HMIS, and convene planning strategy workgroups around best practices to retain clients in housing. This will include examining behavioral health strategies for client management and staff development that target skills and interventions that lead to increased housing retention and exit communications with case management staff. It is anticipated that plan will improve retention and exit communications to other PH solutions by 12% in 2015, and continue refinement of the process going forward.

**3A-2.4 Identify by name the individual, organization, or committee that will be responsible for increasing the rate of housing stability in CoC-funded projects. (limit 1000 characters)**

CoC Lead Agency, Arbor Development, Catholic Charities Chemung, CoC Housing Task Force, NYS Office of Mental Health, Chemung County Office of Mental Hygiene, Steuben County Community Mental Health

## 3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

### Objective 3: Increase project participants income

#### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Assisting project participants to increase income is one way to ensure housing stability and decrease the possibility of returning to homelessness. Using data from Annual Performance Reports (APR), complete the table below.

**3A-3.1 Number of adults who were in CoC-funded projects as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013:** 321

#### 3A-3.2 Objective 3: Increase project participants income

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-3.2a Enter the percentage of participants in all CoC-funded projects that increased their income from employment from entry date to program exit?	15%	18%	20%
3A-3.2b Enter the percentage of participants in all CoC-funded projects that increased their income from sources other than employment from entry date to program exit?	37%	45%	55%

**3A-3.3 In the table below, provide the total number of adults that were in CoC-funded projects with each of the cash income sources identified below, as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013.**

Cash Income Sources	Number of Participating Adults	Percentage of Total in 3A-3.1	
Earned Income	48	14.95	%
Unemployment Insurance	1	0.31	%
SSI	120	37.38	%

SSDI	51	15.89	%
Veteran's disability	1	0.31	%
Private disability insurance	0		%
Worker's compensation	2	0.62	%
TANF or equivalent	21	6.54	%
General Assistance	83	25.86	%
Retirement (Social Security)	1	0.31	%
Veteran's pension	0		%
Pension from former job	0		%
Child support	12	3.74	%
Alimony (Spousal support)	1	0.31	%
Other Source	3	0.93	%
No sources	0		%

**3A-3.4 Describe the CoC's two year plan (2014-2015) to increase the percentage of project participants in all CoC-funded projects that increase their incomes from non-employment sources from entry date to program exit. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table (3A-3.2) above.  
(limit 1000 characters)**

The SOAR Advisory Team will create a subcommittee to examine ways in addition to SOAR that clients may increase their access to benefits. The group will seek TA as needed. Once strategies are developed, HMIS will monitor rates of performance and this information will be used to fine tune the process.

CoC housing agencies will confer with the CoC Lead Agency on creating mainline benefit training for caseworkers that will maximize their ability to seek benefits and fast track applications similar to the SOAR Process for SSI. Additional SOAR training of case managers will be provided to assess and begin applications for those who meet eligibility requirements.

**3A-3.5 Describe the CoC's two year plan (2014-2015) to increase the percentage of project participants in all CoC-funded projects that increase their incomes through employment from entry date to program exit. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above.  
(limit 1000 characters)**

CoC housing agencies will confer with the CoC Lead Agency on creating a training and employment task force to examine current availability of systems that enable clients to enhance their ability to access job training and workforce investment programs to create opportunities for gainful employment.

The CoC Lead Agency will network with workforce investment, adult literacy, and vocational training entities to assist the CoC and housing providers in placing clients in these programs. In addition, caseworkers will be encouraged to use the employment development aspects of SSI/SSDI to support client entry into the workforce.



**3A-3.6 Identify by name the individual, organization, or committee that will be responsible for increasing the rate of project participants in all CoC-funded projects that increase income from entry date to program exit. (limit 1000 characters)**

CoC Lead Agency, Arbor Development, Catholic Charities Chemung, CoC SOAR Advisory Team, NYS Office of Mental Health, Chemung County Office of Mental Hygiene, Steuben County Community Mental Health, Steuben Economic Development Authority, Steuben County Literacy Coalition, CSS Workforce New York.

## 3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

### Objective 4: Increase the number of participants obtaining mainstream benefits

#### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Assisting project participants to obtain mainstream benefits is one way to ensure housing stability and decrease the possibility of returning to homelessness. Using data from Annual Performance Reports (APR), complete the table below.

**3A-4.1 Number of adults who were in CoC-funded projects as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013.** 321

#### 3A-4.2 Objective 4: Increase the number of participants obtaining mainstream benefits

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-4.2a Enter the percentage of participants in ALL CoC-funded projects that obtained non-cash mainstream benefits from entry date to program exit.	79%	80%	85%

**3A-4.3 In the table below, provide the total number of adults that were in CoC-funded projects that obtained the non-cash mainstream benefits from entry date to program exit, as reported on APRs submitted during the period between October 1, 2013 and September 30, 2013.**

Non-Cash Income Sources	Number of Participating Adults	Percentage of Total in 3A-4.1
Supplemental nutritional assistance program	239	74.45 %
MEDICAID health insurance	254	79.13 %
MEDICARE health insurance	15	4.67 %
State children's health insurance	0	%
WIC	2	0.62 %

VA medical services	2	0.62	%
TANF child care services	0		%
TANF transportation services	0		%
Other TANF-funded services	0		%
Temporary rental assistance	0		%
Section 8, public housing, rental assistance	1	0.31	%
Other Source	2	0.62	%
No sources	0		%

**3A-4.4 Describe the CoC's two year plan (2014-2015) to increase the percentage of project participants in all CoC-funded projects that access mainstream benefits from entry date to program exit. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit 1000 characters)**

The SOAR Advisory Team will create a subcommittee to examine ways in addition to SOAR that clients may increase their access to benefits. The group will seek TA as needed. Once strategies are developed, HMIS will monitor rates of performance and this information will be used to fine tune the process.

CoC housing agencies will confer with the CoC Lead Agency on creating mainline benefit training for caseworkers that will maximize their ability to seek benefits and fast track applications similar to the SOAR Process for SSI. Additional SOAR training of case managers will be provided to assess and begin applications for those who meet eligibility requirements.

**3A-4.5 Identify by name the individual, organization, or committee that will be responsible for increasing the rate of project participants in all CoC-funded projects that access non-cash mainstream benefits from entry date to program exit. (limit 1000 characters)**

CoC Lead Agency, Arbor Development, Catholic Charities Chemung, CoC SOAR Advisory Team, NYS Office of Mental Health, Chemung County Office of Mental Hygiene, Steuben County Community Mental Health, County Departments of Social Services (DSS—Steuben, Chemung, Schuyler, Livingston, and Allegany).

### 3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

#### Objective 5: Using Rapid Re-Housing as a method to reduce family homelessness

##### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Rapid re-housing is a proven effective housing model. Based on preliminary evidence, it is particularly effective for households with children. Using HMIS and Housing Inventory Count data, populate the table below.

#### 3A-5.1 Objective 5: Using Rapid Re-housing as a method to reduce family homelessness.

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-5.1a Enter the total number of homeless households with children per year that are assisted through CoC-funded rapid re-housing projects.	0	0	10
3A-5.1b Enter the total number of homeless households with children per year that are assisted through ESG-funded rapid re-housing projects.	0	0	0
3A-5.1c Enter the total number of households with children that are assisted through rapid re-housing projects that do not receive McKinney-Vento funding.	0	0	0

**3A-5.2 Describe the CoC's two year plan (2014-2015) to increase the number homeless households with children assisted through rapid re-housing projects that are funded through either McKinney-Vento funded programs (CoC Program, and Emergency Solutions Grants program) or non-McKinney-Vento funded sources (e.g., TANF). Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit 1000 characters)**

Several housing partners who are presently operating CoC Program TH are considering reallocation of those projects to RRH. The CoC Lead Agency will be convening the Strategic Planning Team to assess the process for reallocation and realignment of existing TH and moving past potential budgetary obstacles. Given that the governmental entity administration requirement is being lifted, a reexamination of who and how projects could transform would possibly ease implementation.

**3A-5.3 Identify by name the individual, organization, or committee that will be responsible for increasing the number of households with children that are assisted through rapid re-housing in the CoC geographic area. (limit 1000 characters)**

Steuben & Chemung Counties DSS, Catholic Charities of Chemung & Schuyler Counties, Steuben County Government, NYS Office of Mental Health

**3A-5.4 Describe the CoC's written policies and procedures for determining and prioritizing which eligible households will receive rapid re-housing assistance as well as the amount or percentage of rent that each program participant must pay, if applicable. (limit 1000 characters)**

As the CoC region does not have RRH programs operationalized for McKinney Vento funding lines, the policy will need to be developed by the CoC Board. It is understood that participants would have a combined income of no more than 50% AMI, meet the HUD homelessness criteria, and participate in an ongoing case management system.

**3A-5.5 How often do RRH providers provide case management to households residing in projects funded under the CoC and ESG Programs? (limit 1000 characters)**

There is no McKinney Vento funded RRH in the continuum at this point. Developed standards would emerge in the development process but most likely would involve monthly case management and assistance in accessing a variety of treatment, medical, and counseling services. Assessment would also be made for complete access to mainline benefit systems.

**3A-5.6 Do the RRH providers routinely follow up with previously assisted households to ensure that they do not experience additional returns to homelessness within the first 12 months after assistance ends? (limit 1000 characters)**

Again, there is no direct parallel in the continuum outside of the supportive services offered in several PSH environments. It is anticipated that the client will receive approximately 6 months of followup after transitioning to PSH or independent living.

## **3B. Continuum of Care (CoC) Discharge Planning: Foster Care**

### **Instructions:**

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**3B-1.1 Is the discharge policy in place** State Mandated Policy  
**mandated by the State, the CoC, or other?**

**3B-1.1a If other, please explain.**  
**(limit 750 characters)**

Not Applicable

**3B-1.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.**  
**(limit 1000 characters)**

In August 2009, the New York State Office of Children & Family Services issued an Administrative Directive to the Commissioner of each county's Department of Social Services (DSS) that outlined "Transition Plan Requirements for Youth 18 and Older Aging Out of Foster Care". Included in the directive were the requirements that, "The transition plan must include specific options on housing, health insurance, education...(and others)". The CoC Board has a representative from each county's DSS office to maintain consistency and integration with the CoC and discharge practice.

The CoC has also improved communication between discharging agencies and housing stakeholders, including the promotion of the region's 2-1-1 Helpline information and referral system. Transitioning youth are directly discharged into Section 8 housing, transitional housing, or permanent housing depending upon the needs of the individual.

**3B-1.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.**  
**(limit 1000 characters)**

Key agencies involved in transitioning youth include county level DSS staff in each of the 5 continuum counties, non-profit youth case management programs (TASA, Community Action, others), and property owners/state housing programs which have certified and listed available rentals with county transitional caseworkers. The SHP-TH program for transitioning Foster Care youth is operated by Catholic Charities of Chemung/Schuyler. Counties in the CoC vary in the typical locations to which targeted youth are discharged. Generally, DSS staff work with community-based case management programs to discharge youth to apartments or state funded housing options, ensuring that the youth have the supports necessary for successful transition.

## 3B. Continuum of Care (CoC) Discharge Planning: Health Care

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**3B-2.1 Is the discharge policy in place** CoC Adopted Policy  
**mandated by the State, the CoC, or other?**

**3B-2.1a If other, please explain.**  
**(limit 750 characters)**

Not Applicable

**3B-2.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.**  
**(limit 1000 characters)**

To guide health care facilities in transition planning, the New York State Department of Health has issued guidelines and policies to address the housing of discharged patients. Until statewide health care discharge protocols are finalized under the NYS Medicaid Reform Team, the CoC has continued to endorse these strategies. The 5 county CoC region includes a VA Medical Center and 8 hospitals. The CoC lead agency works with healthcare groups to ensure the discharge of patients to appropriate housing, and has also involved public and private long term healthcare facilities (nursing homes/supported living), and individual landlords. Case managers of healthcare agencies begin working with local housing providers prior to discharge to ensure that discharge is made to suitable housing. CoC partner agencies work to communicate and expand the network of placement options that are available to discharge planners and case managers.

**3B-2.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.**  
**(limit 1000 characters)**

Healthcare discharge staff frequently target family members of the person being discharged as primary housing destinations. If family members are not available or willing to receive the discharged person, caseworkers may explore long-term or permanent care facilities for which the individual may qualify, including the VA Medical Center for Veterans, or county healthcare facilities. "Senior Housing" complexes frequently also include residents who meet disability eligibility, regardless of age. Case managers also have an extensive network of state and county affordable housing providers.



## **3B. Continuum of Care (CoC) Discharge Planning: Mental Health**

### **Instructions:**

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**3B-3.1 Is the discharge policy in place mandated by the State, the CoC, or other?** CoC Adopted Policy

**3B-3.1a If other, please explain.  
(limit 750 characters)**

Not Applicable

**3B-3.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.  
(limit 1000 characters)**

The CoC Mental Health Discharge Committee has approved regional mental health discharge protocols which are utilized by local care providers. The committee meets at least annually and through electronic communications to review and update the protocols as necessary to make sure that they meet changing local needs. Our CoC Mental Health Planning Team includes representation from each participating county's mental health agencies, treatment centers and hospitals, the state's regional psychiatric center, as well as public and private providers of homeless and supportive services. These agencies have actively participated in ongoing efforts to ensure that services best meet the needs of participants with mental health concerns, and that these individuals are not discharged into homelessness. The goals of the discharge planning policies are to link clients with supportive, affordable housing and community based mental health services.

**3B-3.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.  
(limit 1000 characters)**

The five-county region includes a VA Medical Center and a state-operated regional psychiatric center, both of which are significant service providers in the region. Clients are often discharged to a private residence, although each participating county has additional options, such as private or state funded residential programs. Many treatment facilities also sponsor their own housing—or extensively collaborate with the networks available to them. Sustainable housing is a critical component of every psychiatric or addiction discharge plan. Housing providers include Catholic Charities of Chemung, Arbor Housing & Development, Chemung, Livingston, and Steuben County Government, Loyola Recovery, Lakeview Mental Health, Bishop Sheen Housing, DePaul—as well as new New York State contracts through the Office of Mental Health for community based scattered site mental health housing and services.

## 3B. Continuum of Care (CoC) Discharge Planning: Corrections

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

### 3B-4.1 Is the discharge policy in place CoC Adopted Policy mandated by the State, the CoC, or other?

#### 3B-4.1a If other, please explain. (limit 750 characters)

Not Applicable

### 3B-4.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge. (limit 1000 characters)

A CoC Corrections Discharge Team has approved protocols that have been incorporated into local practice. The team includes representation from the division of state & county parole, county jails, and homeless service providers representing both public and private agencies. The SOAR Initiative undertaken by the Continuum is developing resources to work with regional state prisons to identify eligible inmates prior to release to begin applying for SSI/SSDI benefits to ensure that they are financially stable upon release.

The majority of released individuals are discharged to their private residences, though a few small private transition programs are operated throughout the region. Coordination between the correction facilities and the county Departments of Social Services often results in individuals being discharged into motels or other facilities to meet short-term needs until more appropriate locations can be secured, including forensic apartment programs.

### 3B-4.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness. (limit 1000 characters)

Meeting this need is one of the most difficult for the Continuum, especially for those who are convicted of sex crimes. Housing placement typically begins with pre-release conferencing between county jails and county DSS offices. Those released typically return to their own homes, or interact with providers in each county. These providers include local motels that offer efficiency apartments, Arbor Housing, NY State Division of Parole, OTDA, and the Veteran's Administration.

## 3C. Continuum of Care (CoC) Coordination

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**3C-1 Does the Consolidated Plan for the jurisdiction(s) within the CoC's geography include the CoC's strategic plan goals for addressing and ending homelessness?** Yes

**3C-1.1 If yes, list the goals in the CoC strategic plan. (limit 1000 characters)**

Only one governmental jurisdiction within the 5 county Continuum is a HUD Entitlement Community required to maintain a Consolidated Plan. This is the City of Elmira. Other communities have established similar planning documents for their comprehensive planning process. The goals that Elmira and others have identified that aligns with elements of the CoC General Strategic Plan are: a) Coordination of services to move unsheltered or transitional housing populations quickly to permanent housing solutions; b) Planning activities which expand the availability of affordable and subsidized housing solutions for homeless individuals and families, and; c) Work to ensure opportunities are available for special needs homeless individuals under the Fair Housing standards.

**3C-2 Describe the extent in which the CoC consults with State and local government Emergency Solutions Grants (ESG) program recipients within the CoC's geographic area on the plan for allocating ESG program funds and reporting on and evaluating the performance of ESG program recipients and subrecipients. (limit 1000 characters)**

Although an Entitlement Community, the City of Elmira is not a direct ESG recipient. In New York State, all balance of state ESG is blended with several state homelessness assistance funds by the Office of Temporary Disability Assistance (OTDA) into a competitive grant program known as STEHP. The CoC consults with county level applicants to ensure programs meet gaps in services and regional homelessness goals.

All STEHP grantee organizations are general members of the CoC, or hold CoC Board positions—including county level OTDA Division of Social Services authorities. The City of Elmira has a Board seat. This ensures that all recipients are party to collaborative needs planning efforts. STEHP grantees also participate in the NY-501 STEPS HMIS. Through the program data they enter, it is possible to monitor and evaluate the effectiveness of programs that report client level data into the HMIS.

**3C-3 Describe the extent in which ESG funds are used to provide rapid re-housing and homelessness prevention. Description must include the percentage of funds being allocated to both activities. (limit 1000 characters)**

In FY2012, OTDA awarded STEHP grant contracts for services in the amount \$840K, of which approximately 20% was ESG line funds—roughly \$168K—to 4 organizations. Some grantees subcontracted elements of their award to other service providers. Resulting services included emergency and transitional housing shelter (65%); domestic violence shelter housing operations (15%); outreach & supportive services (20%). Approximately 70% of the transitional housing projects are operating under the RRH model. Other ES/TH projects leverage approximately \$120K in CoC Project awards. This blended funding leveraged funding then assists organizations to meet the costs of operating programs that provide comprehensive supportive services aimed at housing stabilization, rapid re-housing services (obtaining a permanent living situation) and eviction prevention assistance to individuals and families.

**3C-4 Describe the CoC's efforts to reduce the number of individuals and families who become homeless within the CoC's entire geographic area. (limit 1000 characters)**

The CoC engages this goal in two directions. The first is through assessment of existing resources and services, and through the deployment of a coordinated services and referral structured to bring a homeless person quickly to housing, financial sustainability, and self-sufficiency. The first line approach is coordinated assessment through the 2-1-1 information & referral system, to get the client to the right resource at the right time. Intake screenings identify unmet needs and prioritize them—also identifying candidates for SSI/SSDI enrollment through the Continuum's SOAR Initiative, and possible enrollment in New York State NYSTATEOFHEALTH ACA exchanges. A priority within this is diversion, which reduces the instances of homelessness, and seeks to change the path to chronic homelessness. This is accomplished through the collaboration of case workers, case managers, housing providers, mental health services, and mainline benefit providers.

**3C-5 Describe how the CoC coordinates with other Federal, State, local, private and other entities serving the homeless and those at risk of homelessness in the planning and operation of projects. (limit 1000 characters)**

The NY-501 CoC is a very diverse membership body, representing 56 member organizations. The Board is comprised of officials and staff from the major social service provider organizations. These groups represent NYS OTDA County Division of Social Services, county government, NYS parole and probation, law enforcement, county mental health, the Veterans Administration, the addictions treatment industry, and social justice. Meetings are attended by representatives of elected officials for state legislature and congressional office. The CoC supports grantees from County government and State Office of Mental Health through CoC Program S+C programs and sponsor organizations. We interact closely with the housing development community to plan future affordable housing needs, as well as the county government community development offices--and encourage networking and project service leverage in agency planning efforts. We also coordinate with SSVF grantee and Veteran Service Offices to target services to veteran populations.

**3C-6 Describe the extent in which the PHA(s) within the CoC's geographic area are engaged in the CoC efforts to prevent and end homelessness. (limit 1000 characters)**

Only two formally constituted PHA exists in the Continuum—one located in the City of Elmira (Chemung) and the second in the city of Hornell (Steuben). The Elmira community development office coordinates with their PHA on matters of public housing within the city. In Hornell, the PHA coordinates with Department of Social Services. For the remainder of the CoC, several non-profit entities are large scale developers of affordable, low income, special needs, and subsidized housing units—filling the niche usually served by a PHA. These entities maintain a presence on the CoC Board, and are also responsible for management of HUD/VASH and Section 8 voucher housing. Through their supportive services, a planning linkage is created to mental & substance abuse services, job training and workforce development programs, and transportation assistance.

**3C-7 Describe the CoC's plan to assess the barriers to entry present in projects funded through the CoC Program as well as ESG (e.g. income eligibility requirements, lengthy period of clean time, background checks, credit checks, etc.), and how the CoC plans to remove those barriers. (limit 1000 characters)**

CoC Program funded housing partners within the NY-501 CoC all utilize a "Housing First" model in placement of incoming residents. The sole exception might be an individual who has a sexual offender status, and by stipulation of community control is subject to boundary or population conditions that eliminate them from participating in PSH programs. Otherwise, the typical barriers of creditworthiness, employment history, ordinary criminal history, or term of sobriety do not come into consideration. This 'open door' practice does not extend outside of the CoC Program housing with any consistency. The CoC plan is to adopt strategies for landlord education; foster the development of affordable housing for those who have criminal or sexual offender records; and implement tracking measures to identify 'friendly' property management for matched placement of difficult to house clients.

**3C-8 Describe the extent in which the CoC and its permanent supportive housing recipients have adopted a housing first approach. (limit 1000 characters)**

The NY-501 Regional CoC understands the importance of quickly transitioning a client to stability, especially those coming from unsheltered or chronic homelessness. We have therefore adopted a "Housing First" policy in all CoC Program funded projects and programs. This policy is not contingent upon participation in mental health or addiction treatment. Certain practical limitations do exist in those cases where placement of a client endangers themselves or others due to their untreated issues. Beginning in 2014, compliance with Housing First principles will become part of the program assessment criteria of the CoC Lead Agency, and the CoC Project Priority Ranking criteria will assign points for meeting this policy.

**3C-9 Describe how the CoC's centralized or coordinated assessment system is used to ensure the homeless are placed in the appropriate housing and provided appropriate services based on their level of need. (limit 1000 characters)**

The CoC and HMIS Lead Agencies are facilitating a stepped rollout of the continuum wide "Southern Tier Entry to Programs & Services" (STEPS) coordinated assessment system. Utilizing the 2-1-1 Helpline system operated by the CoC Lead Agencies, and the 'No Wrong Door' approach to uniform client screening, prospective homelessness service clients can be rapidly prioritized and referred to services. The entry screening form collects all preliminary data necessary to populate a unique HMIS data record containing all of the information that is required by HUD to populate the standards requirement. This information can then be used to rapidly match client need and service priority to specific participating resources—and provide the resource or 'hand-off' case manager a wealth of information to expedite clients to conventional or VA supports including SSVF case management.

**3C-10 Describe the procedures used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to request housing or services in the absence of special outreach. (limit 1000 characters)**

CoC member agencies which provide supportive services and housing comply will all requirements of the Fair Housing Act, Equal Access to Housing, Economic Opportunities for Low and Very Low income Persons, and Compliance with Fair Housing and Civil Rights provisions as stipulated in the NOFA. The CoC maintains a Section 504 Grievance and Resolution policy, and also has adopted each of these aforementioned acts as internal policy and a compliance requirement for new CoC members. Individual agencies and the Lead Agency regularly communicate service program availability and housing opportunity through networking with faith based organizations, rural health collaboratives, and public education. All stakeholders are engaged in a continuing process of outreach and communication targeting the most diverse and needy populations—as well as collaborative efforts to improve outreach and program effectiveness.

**3C-11 Describe the established policies that are currently in place that require all homeless service providers to ensure all children are enrolled in early childhood education programs or in school, as appropriate, and connected to appropriate services within the community. (limit 1000 characters)**

In Fall, 2010, the full CoC body voted and approved the implementation of an Education

Assurances Policy, which outlines the CoC's commitment to homeless students in the region. The policy includes the expectations that the CoC is to work with designated Homeless School Liaisons, that all housing agencies continually work to identify homeless students, and that public and private agencies prioritize the educational needs of homeless students. This policy is assessed annually and updated as required. Additionally, the policy stipulates that the homeless student liaison designees meet on a periodic basis and share experiences and updates on homeless services programs within their districts. Each agency wishing to participate in the CoC Program Grant Competition must have incorporated an educational assurances policy within their housing or services program, and stipulate the presence of this policy within their Project Applications if the project population serves children.

**3C-12 Describe the steps the CoC, working with homeless assistance providers, is taking to collaborate with local education authorities to ensure individuals and families who become or remain homeless are informed of their eligibility for McKinney-Vento educational services. (limit 1000 characters)**

The CoC and its Lead Agency has actively reached out and engaged designated homeless student liaisons from districts across the five-county CoC region. These liaisons participate in county-specific homeless coalitions, thus linking the districts, and more importantly the families, with the McKinney-Vento homeless and supportive services in the region. As participating CoC partners, the districts have full voting powers in CoC decisions. Additionally, the CoC and Lead Agency collaborate with the New York State Technical & Education Assistance Center for Homeless Students (NYSTEACHS)

to further promote the identification of homeless families and the utilization of homeless/supportive services for these families, primarily by disseminating information and strengthening the link between the designated school liaisons and service providers. The Lead Agency is also working with school districts to encourage them to fill vacancies in school liaison personnel as they occur.

**3C-13 Describe how the CoC collaborates, or will collaborate, with emergency shelters, transitional housing, and permanent housing providers to ensure families with children under the age of 18 are not denied admission or separated when entering shelter or housing. (limit 1000 characters)**



The CoC Board leadership is comprised of senior administrators that represent the service and housing agencies that provide these services across the 5 county region. The CoC, its Lead Agency, and the Board believe that stabilization client families is best accomplished in a holistic fashion—with the least amount of continuing disruption to the family unit once entry to the care system has begun. As such, CoC leadership and their programs strive to maintain familial structures, ensure that children are enrolled in the public school systems, and that service provision which leads to permanent housing and stabilization include preservation of the family unit in housing and services wherever possible. The CoC Lead Agency also works to identify best practice models of family preservation and stabilization, and communicate these resources to CoC member agency programs.

**3C-14 What methods does the CoC utilize to monitor returns to homelessness by persons, including, families who exited rapid re-housing? Include the processes the CoC has in place to ensure minimal returns to homelessness.  
(limit 1000 characters)**

The NY-501 STEPS HMIS entry and tracking system reports returns to homelessness and has the ability to generate custom reports by agency and program. It is the continuing best practice model as being shaped by the Coordinated Assessment process to carefully match the client with the service that best fills their need, and is best able to provide or refer the client to appropriate leveraged services. Depending upon the program and supportive services, client case managers attempt to maintain 'leavers' for stability and possible referral to different levels of assistance or support.

**3C-15 Does the CoC intend for any of its SSO or TH projects to serve families with children and youth defined as homeless under other Federal statutes?**

No

**3C-15.1 If yes, describe how the use of grant funds to serve such persons is of equal or greater priority than serving persons defined as homeless in accordance with 24 CFR 578.89. Description must include whether or not this is listed as a priority in the Consolidated Plan(s) and its CoC strategic plan goals. CoCs must attach the list of projects that would be serving this population (up to 10 percent of CoC total award) and the applicable portions of the Consolidated Plan.  
(limit 1000 characters)**

Not Applicable

**3C-16 Has the project been impacted by a major disaster, as declared by President Obama under Title IV of the Robert T. Stafford Act in the 12 months prior to the opening of the FY 2013 CoC Program Competition?**

No

**3C-16.1 If 'Yes', describe the impact of the natural disaster on specific projects in the CoC and how this affected the CoC's ability to address homelessness and provide the necessary reporting to HUD.  
(limit 1500 characters)**

Not Applicable

### 3D. Continuum of Care (CoC) Coordination with Strategic Plan Goals

#### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**In 2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP).**

**3D-1 Describe how the CoC is incorporating the goals of Opening Doors in local plans established to prevent and end homelessness and the extent in which the CoC is on target to meet these goals.  
(limit 1000 characters)**

The NY-501 Regional CoC has made policy the four major goals set forth in the Opening Doors plan. This has been integrated into CoC practice by approaching chronic homelessness through the Housing First case management paradigm; Veteran homelessness by collaboration with VA supportive and subsidy programs along with coordination with the regional SSVF grantee to permanently re-house veterans; to connect families and youth with stabilization, rapid rehousing, and access to mainline benefit, jobs training, and educational advancement for long-term stability; planning and advocacy for programs and development which increase the available stock of affordable, permanent housing in the region. By combining these measures along with increased collaboration and leveraging of regional resources, the CoC anticipates continuing on a path of effective service provision that reduces the intensity of service approach required and concentrates on prevention and affordable housing development.

**3D-2 Describe the CoC's current efforts, including the outreach plan, to end homelessness among households with dependent children.  
(limit 750 characters)**

The CoC policies and strategic planning contain specific plans to coordinate supportive and homelessness services for prioritization of local resources to serve the needs of families and children as the need for addressing chronics continues to decline. This includes outreach to working homeless families. Grantees are also reexamining their existing TH programs serving single special needs populations for the possibility of reallocation to new, PSH housing programs. Combined with the deployment of a Coordinated Assessment Plan system, the CoC anticipates tighter integration of collaborative services to focus on younger families, meeting the increasingly emergent needs this population faces.

**3D-3 Describe the CoC's current efforts to address the needs of victims of domestic violence, including their families. Response should include a description of services and safe housing from all funding sources that are available within the CoC to serve this population.**

**(limit 1000 characters)**

The CoC is served by 2 programs that provide care from ES through TH & PH/PSH. Both utilize CoC Program TH funding streams, along with NYS balance of state blended ESG in the STEHP grant program. Chances & Changes operates a DV shelter with full case management supportive services, and channels clients directly to PH or if circumstances dictate, to TH. "The Net" DV shelter program is similar, but connected to a larger PSH and PH housing group. Both shelters engage in education and outreach initiatives, and serve on regional councils setting DV policy. Along with the above HUD sources they receive funds from NYS, NYS Office of Mental Health, county government in-kind contributions, and a variety of private and philanthropic gifts.

**3D-4 Describe the CoC's current efforts to address homelessness for unaccompanied youth. Response should include a description of services and housing from all funding sources that are available within the CoC to address homelessness for this subpopulation. Indicate whether or not the resources are available for all youth or are specific to youth between the ages of 16-17 or 18-24.**

**(limit 1000 characters)**

Several programs exist within the NY-501 CoC. Catholic Charities of Chemung and Schuyler Counties operates a CoC Program TH program, Project SHARE for youth 18-25. In Chemung they run the Lasting Success foster transitional TH, and in Schuyler the Schuyler County Runaway and Homeless Youth Program for ages 14-21. All youth 18-24 is eligible to be served in any of the adult PSH or PH housing projects. Also under the federal Runaway and Homeless Act (RHYA) and NY RHYA regulations, several initiatives are funded on the county level through county funds, and funding streams from the NY Office of Children and Family Services.

**3D-5 Describe the efforts, including the outreach plan, to identify and engage persons who routinely sleep on the streets or in other places not meant for human habitation.**

**(limit 750 characters)**

The NY-501 is a primary rural CoC—populated with small towns and evasive homeless. Urban zones Elmira & Corning are hosting populations that reflect the new face of homelessness—younger and often single parent families of working poor. Outreach strategies include interaction with religious groups; media outreach for homelessness services; and networking in locations where younger people tend to congregate. Traditional street level outreach is delivered through groups such as Catholic Charities, Salvation Army, and community kitchen locations. To become more effective in reaching special needs unsheltered city homeless, one CoC partner has hired a specialist to create new systems for street intervention for 2014.

**3D-6 Describe the CoC's current efforts to combat homelessness among veterans, particularly those are ineligible for homeless assistance and housing through the Department of Veterans Affairs programs (i.e., HUD-VASH, SSVF and Grant Per Diem). Response should include a description of services and housing from all funding sources that exist to address homelessness among veterans. (limit 1000 characters)**

The CoC includes the Bath VAMC, an primary in addressing the needs of Veterans throughout the region. The VA's HCHV Coordinator is an active participant in CoC subcommittees, and coordinates HUD VASH vouchers and VA supported housing vouchers to CoC provider agencies. The CoC also supports the regional SSVF grantee in delivering that program to local veterans. These efforts support the CoC's strategic plan goals to increase the percentage of veterans who move into PH, and to increase the average participation in permanent housing programs to at least six months. This supports the CoC's goal to increase options for chronically homeless individuals, as a significant portion of chronically homeless in the region are Veterans. Advocacy of supportive services also provide prevention to eliminate homelessness in at-risk individuals and their families.

## 3E. Reallocation

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**3E-1 Is the CoC reallocating funds from one or more eligible expiring grant(s) into one or more new permanent supportive housing projects dedicated to chronically homeless persons?**

No

**3E-2 Is the CoC reallocating funds from one or more eligible expiring grant(s) into one or more new rapid re-housing project for families?**

No

**3E-2.1 If the CoC is planning to reallocate funds to create one or more new rapid re-housing project for families, describe how the CoC is already addressing chronic homelessness through other means and why the need to create new rapid re-housing for families is of greater need than creating new permanent supportive housing for chronically homeless persons.  
(limit 1000 characters)**

Not Applicable

**3E-3 If the CoC responded 'Yes' to either of the questions above, has the recipient of the eligible renewing project being reallocated been notified?**

Not Applicable

## 4A. Continuum of Care (CoC) Project Performance

### Instructions

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

#### **4A-1 How does the CoC monitor the performance of its recipients on HUD-established performance goals? (limit 1000 characters)**

The CoC Lead Agency and its Director regularly evaluate and set timeline benchmarks for project performance based upon program application data, HMIS data, APR's, quarterly reporting, and LOCCS reports from HUD. A summary report of each program's performance is delivered to the CoC Board at each Quarterly meeting. Any grant which is not performing at standard is further evaluated for the cause of the deficit. The lead agency then works with the grantee to develop a corrective plan that addresses the problem and then continues to assess ability to self-correct, or obtain technical assistance to improve operational policy.

#### **4A-2 How does the CoC assist project recipients to reach HUD-established performance goals? (limit 1000 characters)**

As a result of the CoC monitoring and evaluation process the Lead Agency regularly communicates evidence based, best practice models which are appropriate to the service and direct or HUD requested technical assistance to program administrators and staff. At monthly and quarterly Board meetings, grantees are given the opportunity to share challenges, successes, and methods. The CoC regularly notifies participants of the availability of technical assistance and best practice workshops; coordinates webinar events and notification of HUD training availability; creates and delivers specialized training and webinar delivery; and provides direct 1:1 technical assistance in shaping program requirements to meet HUD and CoC performance goals.

#### **4A-3 How does the CoC assist recipients that are underperforming to increase capacity? (limit 1000 characters)**

If a program were to be identified across two quarters as under-performing or experiencing difficulty in operationalizing components of the project, the CoC Director would work with senior program staff to develop a corrective plan that would include varying levels of technical assistance to solve and overcome issues. If these issues pose a threat to project funding, the Lead Agency will work with the grantee and HUD Field Office regional agents to correct the problem or negotiate a reallocation of funding to another project.

#### **4A-4 What steps has the CoC taken to reduce the length of time individuals and families remain homeless? (limit 1000 characters)**

The primary tracking mechanism is the Continuum's HMIS reporting system. Non-HMIS shelter and transitional housing such as domestic violence track in internal database systems and APR reporting, and faith based programs report independently to the CoC Administrator. Regular reports are generated to indicate time of stay in ES and TH programs and are evaluated along with length of stay in PH/PSH programs. This information is also utilized in scoring annual evaluations and CoC Program Priority Ranking. Based upon program metrics, recommendations may be made to engage additional supportive or incentive programs that reduce transient participation, fast track certain special needs clients into permanent housing—thus reducing repeated incidents of homelessness.

**4A-5 What steps has the CoC taken to reduce returns to homelessness of individuals and families in the CoC's geography?  
(limit 1000 characters)**

The CoC is working to develop specific supportive resource availability based upon the information and referral database of the regional 2-1-1 Helpline system. The purpose is to enhance our current capabilities of placing clients in housing solutions based upon particular abilities or needs. The NY-501 is presently developing in concert with this a set of new performance based measure requirements for Continuum project reporting that may be used to determine gaps or strengths in supportive service offerings—and advise regional providers of requirements for the development of additional support leveraging to ensure the full participation of the client. Additionally, the CoC emphasis on SOAR for acquisition of mainline benefits through SSI/SSDI, and SSVF supported fast tracking for eligible clients opens doors to external programs for rehabilitation, job training, employment subsidies, and additional therapeutic services.

**4A-6 What specific outreach procedures has the CoC developed to assist homeless service providers in the outreach efforts to engage homeless individuals and families?  
(limit 1000 characters)**

Individual agencies and the CoC Lead Agency have provided regular public information and education to individuals, the community, and faith based organizations. Communications to expand outreach have also been extended into the school systems, businesses frequented by low to low-low income populations, and public libraries and healthcare facilities. The CoC Lead Agency also operates the regional 2-1-1 Helpline system, and information & referral specialists provide callers with information based upon query about homelessness resources and outreach. In addition, the largest CoC Program funded provider has hired additional staff to develop new outreach programs, and to expand the capacity and effectiveness of existing ones.



## **4B. Section 3 Employment Policy**

### **Instructions**

\*\*\* TBD \*\*\*

**4B-1 Are any new proposed project applications requesting \$200,000 or more in funding?** No

**4B-1.1 If yes, which activities will the project(s) undertake to ensure employment and other economic opportunities are directed to low or very low income persons? (limit 1000 characters)**

Not Applicable

**4B-2 Are any of the projects within the CoC requesting funds for housing rehabilitation or new constructions?** No

**4B-2.1 If yes, which activities will the project undertake to ensure employment and other economic opportunities are directed to low or very low income persons:**

## 4C. Accessing Mainstream Resources

### Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**4C-1 Does the CoC systematically provide information about mainstream resources and training on how to identify eligibility and program changes for mainstream programs to provider staff?** Yes

**4C-2 Indicate the percentage of homeless assistance providers that are implementing the following activities:**

* Homeless assistance providers supply transportation assistance to clients to attend mainstream benefit appointments, employment training, or jobs.	100%
* Homeless assistance providers use a single application form for four or more mainstream programs.	60%
* Homeless assistance providers have staff systematically follow-up to ensure mainstream benefits are received.	100%

**4C-3 Does the CoC make SOAR training available for all recipients and subrecipients at least annually?** Yes

**4C-3.1 If yes, indicate the most recent training date:** 10/16/2013

**4C-4 Describe how the CoC is preparing for implementation of the Affordable Care Act (ACA) in the state in which the CoC is located. Response should address the extent in which project recipients and subrecipients will participate in enrollment and outreach activities to ensure eligible households are able to take advantage of new healthcare options. (limit 1000 characters)**

In a CoC Board strategy session, CoC program providers agreed to incorporate ACA into the initial benefit screening for new homelessness service clients along with the SOAR SSI/SSDI eligibility assessment. Existing clients are re-evaluated for eligibility on a regular basis. Participation is 100% for all CoC program grantees, and is expanding to other supported housing programs outside of OneCPD initiatives. Additionally, the Institute for Human Services, as Lead Agency for the CoC also operates the regional 2-1-1 Helpline system. All operators are specially trained to screen caller eligibility for ACA and SSI/SSDI intake. Appropriate clients are referred for SSI enrollment to case specialists, while the 2-1-1 specialist can directly assist the caller in navigating the NYS "My State of Health" ACA exchange interface.

**4C-5 What specific steps is the CoC taking to work with recipients to identify other sources of funding for supportive services in order to reduce the amount of CoC Program funds being used to pay for supportive service costs?  
(limit 1000 characters)**

The CoC Lead Agency publishes monthly and as needed alerts to its CoC Project partners and membership community via email and weekly newsletter. These notices of available funding opportunities are derived by research on Grants.gov, the New York state grant clearinghouse, the use of GrantStation and funding alerts from national homelessness and low income organizations such as HAC, NLIHC, and others. In addition IHS works directly with CoC members and community nonprofits in providing technical assistance in grant preparation, developing leveraging opportunities and offers full grantwriting services.

## Attachments

Document Type	Required?	Document Description	Date Attached
Certification of Consistency with the Consolidated Plan	Yes	FY2013 Certificat...	02/01/2014
CoC Governance Agreement	No	FY2013 CoC Govern...	02/01/2014
CoC-HMIS Governance Agreement	No	NY-501 HMIS MOU C...	02/03/2014
CoC Rating and Review Document	No	NOFA Detailed NY-...	02/03/2014
CoCs Process for Making Cuts	No		
FY2013 Chronic Homeless Project Prioritization List	No		
FY2013 HUD-approved Grant Inventory Worksheet	Yes	FY2013 HUD Certif...	02/01/2014
FY2013 Rank (from Project Listing)	No	FY2013 Priority P...	02/02/2014
Other	No	HMIS Interim Manu...	02/03/2014
Other	No		
Other	No		
Projects to Serve Persons Defined as Homeless under Category 3	No		
Public Solicitation	No	NY-501 Website Sc...	02/03/2014

## **Attachment Details**

**Document Description:** FY2013 Certification with Con Plans

## **Attachment Details**

**Document Description:** FY2013 CoC Governance MOU

## **Attachment Details**

**Document Description:** NY-501 HMIS MOU Contract

## **Attachment Details**

**Document Description:** NOFA Detailed NY-501 Application and Ranking Process

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** FY2013 HUD Certified GIW

## **Attachment Details**

**Document Description:** FY2013 Priority Project Ranking Submission

## **Attachment Details**

**Document Description:** HMIS Interim Manual and Data Quality Plan

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** NY-501 Website Screen Captures

## Submission Summary

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<b>3B. CoC Discharge Planning: Corrections</b>	01/27/2014
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<b>3E. Reallocation</b>	02/02/2014
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<b>4B. Employment Policy</b>	02/02/2014
<b>4C. Resources</b>	02/02/2014
<b>Attachments</b>	02/03/2014
<b>Submission Summary</b>	No Input Required





**NY-501 Regional Continuum of Care**  
***City of Elmira, Steuben, Allegany, Livingston, Chemung & Schuyler Counties***

**FY2013 HUD Continuum of Care Program Collaborative Application**

**LISTING OF SUBMITTED PROJECTS**  
**Consolidated Plan Certification**  
**Executed Form 2991**

**For**

**JURISDICTION: Steuben County, New York**

**JURISDICTION: City of Elmira, New York**

**JURISDICTION: Allegany County, New York**

**NY-501 Regional Continuum of Care**  
*City of Elmira, Steuben, Allegany, Livingston, Chemung & Schuyler Counties*

**FY2013 HUD Continuum of Care Program Collaborative Application**

**LISTING OF SUBMITTED PROJECTS**  
**Consolidated Plan Certification**

<b>JURISDICTION: Steuben County, New York</b>		
<b>PROJECT</b>	<b>TYPE</b>	<b>APPLICANT</b>
CoC S+C	Renewal TRA	Steuben County
Transitionals to Permanent Supportive Housing	Renewal SHP-TH	Steuben Churchpeople Against Poverty, Inc. dba Arbor Housing & Development
CoC Planning Grant 2013	New CoC Program NOFA	Institute for Human Services, Inc.

**Certification of Consistency  
with the Consolidated Plan****U.S. Department of Housing  
and Urban Development**

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.  
(Type or clearly print the following information:)

Applicant Name: Institute for Human Services, Inc.

Project Name: FY2013 CoC Program Planning Grant

Location of the Project: 6666 Co. Road 11, Bath, NY- Steuben County, New York

Name of the Federal  
Program to which the  
applicant is applying: HUD Continuum of Care Program

Name of  
Certifying Jurisdiction: Steuben County

Certifying Official  
of the Jurisdiction  
Name: Mark Alger

Title: Steuben County Administrator

Signature: 

Date: 1/30/2014

**Certification of Consistency  
with the Consolidated Plan****U.S. Department of Housing  
and Urban Development**

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.  
(Type or clearly print the following information:)

Applicant Name: Steuben County (1 Project), SCAP dba Arbor Housing (1 Project)

Project Name: Steuben Co. CoC S+C, Transitionals to PSH (SCAP)


Location of the Project: Various -- Steuben County, New York

Name of the Federal  
Program to which the  
applicant is applying: HUD Continuum of Care Program

Name of  
Certifying Jurisdiction: Steuben County

Certifying Official  
of the Jurisdiction  
Name: Mark Alger

Title: Steuben County Administrator

Signature: 

Date: 1/16/2013

**NY-501 Regional Continuum of Care**  
*City of Elmira, Steuben, Allegany, Livingston, Chemung & Schuyler Counties*

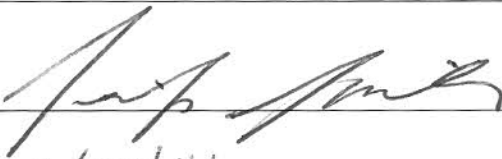
**FY2013 HUD Continuum of Care Program Collaborative Application**

**LISTING OF SUBMITTED PROJECTS**  
**Consolidated Plan Certification**

<b>JURISDICTION: City of Elmira, New York</b>		
<b>PROJECT</b>	<b>TYPE</b>	<b>APPLICANT</b>
HMIS	Renewal SHP-HMIS	Catholic Charities of Chemung/Schuyler
New HMIS	Renewal SHP-HMIS	Catholic Charities of Chemung/Schuyler
OMH/Gateways 2013	Renewal SRA/	NYS Office of Mental Health, Applicant--Catholic Charities of Chemung/Schuyler, Sponsor
HSH (Homeless Supportive Housing)	Renewal SHP-PH	Catholic Charities of Chemung/Schuyler
Project SHARE	Renewal SHP-TA	Catholic Charities of Chemung/Schuyler
PHP (Permanent Housing Program)	Renewal SHP-PH	Catholic Charities of Chemung/Schuyler

**Certification of Consistency  
with the Consolidated Plan****U.S. Department of Housing  
and Urban Development**

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.  
(Type or clearly print the following information:)

Applicant Name: Catholic Charities of Chemung/Schuyler CountiesProject Name: HMIS, OMH/Gateways, HSH, SHARE, SHP PHP (All Renewals)Location of the Project: 215 East Church Street  
Elmira, New York 14901Name of the Federal  
Program to which the  
applicant is applying: HUD Continuum of CareName of  
Certifying Jurisdiction: City of ElmiraCertifying Official  
of the Jurisdiction  
Name: Jennifer MillerTitle: Community Development DirectorSignature: Date: 1/21/14

**NY-501 Regional Continuum of Care**  
*City of Elmira, Steuben, Allegany, Livingston, Chemung & Schuyler Counties*

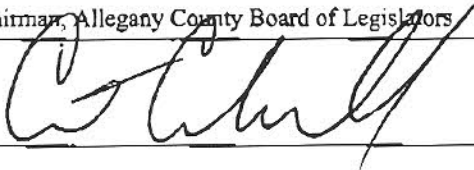
**FY2013 HUD Continuum of Care Program Collaborative Application**

**LISTING OF SUBMITTED PROJECTS**  
**Consolidated Plan Certification**

<b>JURISDICTION: Allegany County, New York</b>		
<b>PROJECT</b>	<b>TYPE</b>	<b>APPLICANT</b>
ACCORD Supportive Housing Program 2013	Renewal SHP-TH	ACCORD Corp.
ACCORD Transitional Housing Program 2013	Renewal SHP-TH	ACCORD Corp.

**Certification of Consistency  
with the Consolidated Plan****U.S. Department of Housing  
and Urban Development**

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.  
(Type or clearly print the following information:)

Applicant Name: ACCORD CorporationProject Name: ACCORD Supportive Housing Program (Renew), Transitional Housing PrLocation of the Project: Scattered sites throughout Allegany CountyName of the Federal  
Program to which the  
applicant is applying: HUD Continuum of Care ProgramName of  
Certifying Jurisdiction: Allegany CountyCertifying Official  
of the Jurisdiction  
Name: Curtis CrandallTitle: Chairman, Allegany County Board of LegislatorsSignature: Date: 01/23/14



**MEMORANDUM OF UNDERSTANDING:**

***Regional Continuum of Care Coordination***

**AGREEMENT:**

- **ACCORD, Inc.**
- **Catholic Charities of Chemung/Schuyler**
- **Catholic Charities of Schuyler**
- **Arbor Development**
- **Livingston County Department of Social Services**
- **Institute for Human Services, Inc.**

**THIS AGREEMENT**, made effective the 1st day of January, 2014, is hereby made by and between The Institute for Human Services, Inc. (IHS), having offices in Bath, Steuben County, New York; ACCORD, Inc., having offices in Belmont, Allegany County, New York; Catholic Charities of Chemung/Schuyler (CCCS), having offices in Elmira, Chemung County, New York; Arbor Development (AD), having offices in Bath, Steuben County, New York; Catholic Charities of Schuyler County (CCS), having offices in Watkins Glen, Schuyler County, New York; and the Livingston County Department of Social Services (LC), having offices in Geneseo, Livingston County, New York

**WHEREAS** the United States Department of Housing and Urban Development (HUD) has expressed a desire that communities develop a plan to address homelessness, including a 10-year plan to eliminate chronic homelessness, and has created the Continuum of Care (CoC) Application process for jurisdictions to apply for and receive HUD funding under the McKinney-Vento Act; and

**WHEREAS** ACCORD, CCCS, AD, CCS, and LC desire to contract with an impartial agency to coordinate the operation of a Regional CoC, to minimally include Allegany, Chemung, Livingston, Steuben, and Schuyler Counties; and

**WHEREAS** IHS provides collaborative and resource development services throughout the region, and desires to provide coordination and consultative services to operate the Regional CoC;

**NOW THEREFORE**, the parties agree as follows:

1. **SCOPE OF WORK.** IHS will provide consultative and coordination services related to the operation of the Regional CoC in 2014. With input of the partnering agencies, these services shall include, but not be limited to:
  - a. Consulting with private and public agencies in Allegany, Chemung, Livingston, Steuben, and Schuyler Counties that provide services for homeless individuals and families to identify the needs and issues of those agencies in meeting the needs of the target population;
  - b. Developing materials, processes, and procedures for an annual Point-in-Time count of homeless individuals and families, in accordance with HUD policies.
  - c. Developing and maintaining Operational Policies that will guide the operation of a Regional CoC;
  - d. Developing and convening a semi-annual Homelessness Forum to conduct business matters of the Regional CoC, including updating the Operational Policies;
  - e. Developing and submitting to HUD a FY2013 and FY2014 Regional CoC Application in accordance with requirements established by HUD.
  - f. Facilitating the flow of communication regarding homeless services issues between participating agencies, as well as between the Regional CoC and HUD and other Federal, state, local, or other funding or services resources.
  - g. Communicating with public and private agencies in other counties in the region to encourage the growth of the Regional CoC.
  - h. Scheduling and convening appropriate committee meetings, as indicated in the Operational Policies.

To provide the above services, IHS will employ and/or designate a member of its Resource Development Staff on part-time or full-time basis, based upon the availability of funds and responsibilities of the position.

2. **TERM.** This agreement shall commence on January 1, 2014 and shall expire December 31, 2014.
3. **EXPECTED OUTCOME.** The above scope of work will result in the submitted application expected to meet HUD thresholds for the continuation of current funded programs and the funding of new programs.
4. **CONSIDERATION.** The parties agree that IHS shall receive funds for the provision of services described under "Scope of Work" based upon two factors: a) first, the success of each county in being awarded McKinney-Vento funds through the CoC Application process; and b) second, the census populations of each county
  - a) Each participating county that has not been awarded McKinney-Vento funds through the CoC Application process will pay the amount of \$3,500, in at least monthly portions as detailed in the appropriate invoices, to be developed by IHS. For 2011, this will include:
    - i. Schuyler County, and the portions will be divided between Catholic Charities of Schuyler County and Arbor Development; and
    - ii. Livingston County, and the portions will be paid by the Livingston County Government;
  - b) Each participating county that has been awarded McKinney-Vento funds through the CoC Application process will pay an amount equal to \$175 times the number of thousand population within the county, based upon Census 2010 data. These thousand population figures, according to Census 2010, are: Allegany (50); Chemung (89); Steuben (98). The funds shall be paid in at least monthly portions as detailed in the appropriate invoices, to be developed by IHS.

**THE PARTIES HEREBY ENTER INTO AGREEMENT**, the day and year first above written, as indicated by signatures of individuals with given authority of their respective agencies to enter into such agreement:

**ACCORD, Inc.:**

Representative (print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Catholic Charities of Chemung/Schuyler:**

Representative (print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Arbor Development:**

Representative (print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Catholic Charities of Schuyler County:**

Representative (print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Livingston County Department of Social Services**

Representative (print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Institute for Human Services, Inc.:**

Representative (print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**NY-501 Regional Continuum of Care  
Homeless Management Information System**

**Memorandum of Understanding  
Between the  
NY-501 Regional Continuum of Care,  
the Institute for Human Services, Inc.,  
and  
Catholic Charities of Chemung & Schuyler Counties**

**A. Purpose and Scope**

The purpose of this Memorandum of Understanding is to confirm agreements between the NY-501 Regional Continuum of Care, the Institute for Human Services, Inc., and Catholic Charities of Chemung & Schuyler Counties in connection with the operation of the Continuum of Care's Homeless Management Information System (HMIS). As such, the Memorandum of Understanding sets forth the general understandings, and specific responsibilities of each party relating to key aspects of the governance and operation of the NY-501 Regional Continuum of Care Homeless Management Information System. This agreement is effective on January 1<sup>st</sup>, 2014.

**B. Background**

The Homeless Management Information System (HMIS) is a collaborative project of the NY-501 Regional Continuum of Care, the Institute for Human Services, Inc. (IHS) as the CoC Lead Agency, Catholic Charities of Chemung County (CCCS) as HMIS Lead Agency, and participating Partner Agencies. HMIS is a computerized data collection application designed to capture information about homeless people and homeless programs over time. HMIS is mandated by the U.S. Department of Housing and Urban Development (HUD) for all communities and agencies receiving HUD Continuum of Care (CoC) homeless assistance funds, as well as Emergency Solutions Grants (ESG), and various VA and HUD/VA programs. HMIS is essential to efforts to streamline client services and inform public policy.

Through HMIS, homeless people benefit from improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through HMIS is critical to the preparation of a periodic accounting of homelessness represented by the NY-501 Continuum's geographic region, which may include measuring the extent and nature of homelessness, demographic and other non-personally identifiable information about the populations served, the utilization of services and homeless programs over time, and the effectiveness of homeless programs. Such an unduplicated accounting of homelessness is necessary to service and systems planning, effective resource allocation, and advocacy. The parties to this Memorandum Of Understanding (MOU) share a common interest in collaborating to end homelessness and successfully implementing and operating HMIS in Steuben, Allegany, Livingston, Schuyler, and Chemung Counties—including the City of Elmira.

The NY-501 Regional Continuum of Care is a communitywide collaborative that works to provide a range of homeless housing and services. The continuum of care system components includes planning & policy, monitoring, analysis, prevention, emergency shelter, transitional housing, permanent affordable and permanent supportive housing, supportive services at each stage, specialized programs and outreach for each homeless subpopulations, and integration with “mainstream” programs. HMIS will enable homeless service providers to collect uniform client information over time. Analysis of information gathered through HMIS is critical to accurately calculate the size, characteristics, and needs of the homeless population; these data are necessary to service and systems planning, and advocacy.

### **C. General Understandings**

#### **1. Lead Agency Governance Role**

The Board and General Membership of the NY-501 Regional CoC has designated the Institute for Human Services, Inc. [IHS], as the lead administration and planning agency for efforts to end homelessness and for implementing and operating a homeless CoC system in the NY-501 Regional CoC district. As such and under the provisions of the McKinney Vento Act, HEARTH Act, the 2012 CoC Program Interim Rule, and other HUD policy, the IHS is responsible for HMIS Lead Agency selection, HMIS oversight and implementation—including the final elements of planning, software selection, and ensuring that the HMIS is in compliance with HUD’s national HMIS Standards. IHS’s oversight and governance responsibilities are carried out by the CoC Director, CoC Board, and HMIS Committee (described below), which also provides the Board and Lead Agency with review of all HMIS policies and procedures.

#### **2. HMIS Lead Agency Designation**

The NY-501 Regional CoC Board, and IHS as CoC Lead Agency, designates Catholic Charities of Chemung & Schuyler Counties as the HMIS Lead Agency to manage and directly oversee and monitor HMIS operations on its behalf and to provide HMIS administrative functions, training, and staffing at the direction of the CoC Board, through the Lead Agency.

#### **3. Executive & General Authority**

The NY-501 Regional CoC Executive Board and CoC General Membership comprise the federally constituted and required administrative bodies under the McKinney-Vento Act, HEARTH Act, and CoC Program Interim Rule (including any future iterations of these enabling legislative documents) to act as final local authority in all matters involving the functioning of the Continuum, designation of Lead and HMIS Agencies, and ensuring the performance of all activities necessary to fulfill HUD requirements.

#### **4. Homeless Management Information System Committee**

CoC Partner Agencies and community members actively participate with the CoC Lead and HMIS Lead Agencies through the HMIS Committee in the review and development of the HMIS process, including establishing policies, procedures and protocols for privacy, data sharing protocols, data analysis, reporting, data integrity/quality, etc. essential to the viability and success of the HMIS.

5. **Funding**

*5a. HUD CoC Program Grant(s)*

HMIS activities are eligible to be covered by an annual HUD CoC Program grant(s) and the required local match funds as stipulated in the Acts and annual OneCPD SuperNOFA. It is the responsibility of the HMIS Lead Agency to make application for these funds as part of this agreement. The terms and uses of HUD funds are governed by the annual NOFA, HUD CoC grant agreement and applicable rules.

*5b. Local Jurisdiction and Partner Agency Cash Match*

The HUD CoC Program grant comes with a 25% cash match requirement. CCCS as HMIS Lead Agency has responsibility for facilitating the commitment of the local match and other funding for HMIS from participating jurisdictions, Partner Agencies, and their own operational funding. Continuing match funding is subject to and contingent upon available annual financing from all sources. In the event there is a shortfall in the cash match, the CoC Lead Agency, HMIS Lead Agency, Executive Board, and if needed, the HMIS Committee will explore alternative funding options.

6. **Software and Hosting**

IHS and CCCS have selected a single software product—Foothold Technology AWARDS—to serve as the sole HMIS software application in Continuum of Care. All Partner Agencies agree to use AWARDS as configured for use in the NY-501 Regional CoC HMIS.

7. **Compliance with Homeless Management Information System Standards**

The HMIS is operated in compliance with HUD HMIS Data and Technical Standards and other applicable laws. The parties agree to make changes to this MOU, other HMIS operational documents, and HMIS practices and procedures to comply with the expected revisions that will occur in the future, and to do so within the HUD-specified timeframe for such changes.

8. **Local Operational Policies and Agreements**

The HMIS continues to operate within the framework of agreements, policies, and procedures that have been developed and approved over time by the Continuum through its HMIS Lead Agency, CoC Lead Agency, and HMIS Committee. These agreements, policies and procedures include but are not limited to the general CoC Policies and Procedures Manual, the HMIS Policies and Procedures Manual, Privacy Policies and Notices, Client Release of Information (ROI) Forms and Procedures, Standardized Information Collection Forms (Intake and Exit) to comply with Data Standards and the Coordinated Assessment Plan process, Partner Agency Agreements, and User Agreements. Changes to the policies and procedures made from time to time by the CoC, through its HMIS Lead agency and HMIS Committee, to comply with the HMIS Standards or otherwise improve HMIS operations are anticipated and expected. It is also expected that



the CoC and its Lead Agency may want to make some changes to the policies and procedures in order to accommodate its unique approach to managing and administering the CoC Strategic Plan and HMIS function.

**D. Specific Responsibilities of the Parties**

**1. *NY-501 Regional Continuum of Care Responsibilities***

The NY-501 Regional CoC Board serves as the HMIS governance body, providing oversight, project direction, policy setting, and guidance for the HMIS project. The CoC exercises all its responsibilities for HMIS governance through its Lead Agency, the Institute for Human Services, Inc. These responsibilities include:

- a. Responsible for ensuring and monitoring compliance with the HUD HMIS Standards.
- b. Designating the HMIS Lead Agency and the software to be used for HMIS, and approving changes to the HMIS Lead Agency or software.
- c. Conducting outreach to and encouraging participation by all homeless assistance programs and other mainstream programs serving homeless people.
- d. Developing and/or approving all HMIS operational agreements, policies, and procedures.
- e. Guiding data quality and reporting.
- f. Promoting the effective use of HMIS data, including measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs.

**2. *Catholic Charities of Chemung and Schuyler Counties [CCCS]***

Catholic Charities of Chemung and Schuyler Counties serves as the lead agency for the HMIS project, managing and administering all HMIS operations and activities. CCCS exercises these responsibilities at the direction of the CoC Board and CoC Lead Agency. These responsibilities are contingent on receipt of the appropriate HUD CoC Program Grant funding and local match dollars from participating jurisdictions and Partner Agencies and include:

**General Responsibilities:**

- a. Serving as the applicant and liaison with HUD regarding the HUD HMIS grants.
- b. Attending CoC Board meetings, specific team meetings, and conference calls as necessary.
- c. Serving as the liaison with the software vendor.
- d. Facilitating and attending the HMIS Committee.
- e. Providing overall staffing and an HMIS Administrator for the project.
- f. Participating in the success of HMIS.
- g. Complying with HUD HMIS Standards (including anticipated changes to the HMIS Standards) and all other applicable laws.
- h. CCCS shall be responsible for billing Partner Agencies and jurisdictions for cash match and any applicable annual user or licensing fees.
- i. Annually prepare CoC Program NOFA applications for HMIS funding.

- j. Working in partnership with the CoC Lead Agency to inform elected officials, government agencies, the nonprofit community, and the Public about the role and importance of HMIS and HMIS data.
- k. Provide regular data quality reports, and such requested custom reports as necessary for the operation and analysis of regional CoC programs; prepare and submit data to HUD for the annual AHAR report; participate as necessary in facilitating the annual PIT & HIC count; provide data and documentation as necessary to complete the annual CoC Program Grant Program Competition collaborative application.

### **Project Management and System**

#### **Administration:**

##### **I. General**

- a. Provide and manage end user licenses (per terms of grant agreement with HUD).
- b. Create project forms and documentation (approved by the HMIS Committee and CoC Board).
- c. Provide materials and assisting the CoC Lead Agency with presenting HMIS information on a website.
- d. Prepare project policies and procedures and collaborate with the CoC Director to monitor and ensure compliance on behalf of and at the direction of the CoC Board.
- e. Obtain and maintain signed Partner Agency MOU's.
- f. CCCS will invoice partner agencies and jurisdictions. CCCS will collect local match and will provide accounting of match contributions the CoC and HUD.

##### **II. Security and Reliability:**

- a. Protect confidential data (in compliance with HUD Standards, local privacy policies, and other applicable law), and abide by any restrictions clients have placed on their own data.
- b. Liaison with Foothold Technology in ensuring system uptime and monitoring system performance.
- c. Develop and implement security and confidentiality plans as required by future revisions in HUD HMIS Standards.

##### **II. Administer HMIS end users, including:**

- a. Add and remove Partner Agency users and administrators.
- b. Manage user licenses.

#### **Training:**

Provide all training and user guidance needed to ensure appropriate system use, data entry, data reporting, and data security and confidentiality, including:

- a. Training documentation.
- b. Confidentiality, privacy, data sharing training per Coordinated Assessment Plan.
- c. Application training for agency administrators and end users.



- d. Outreach to users/end user support.
- e. Training timetable.
- f. Help desk.
- g. CCCS will be responsible for Partner Agency staff training as needed and may elect to conduct that training in its technology education lab in Elmira, NY. Any additional trainings and/or cancellations shall be the responsibility of a Partner Agency to make appropriate arrangements, and obtain facility and equipment for changes in scheduling.

#### **Data Quality:**

- a. Ensuring all client and homeless program data are collected in adherence to the HUD HMIS Data Standards and local additional requirements thereto.
- b. Customizing the HMIS application to meet local data requirements.
- c. Monitoring data quality, generating agency exceptions reports, correcting errors.
- d. Ensuring data quality.
- e. Preparing and implementing a data quality plan if required by the revised HUD HMIS Standards.
- f. Carry out aggregate data extraction and reporting including the HMIS data needed for an unduplicated accounting of homelessness, excluding the Point in Time and Street count.
- g. Prepare and upload data as requested (per data sharing agreements) for New York State OTDA data warehousing initiatives.
- h. Assist partner agencies with agency-specific data collection and reporting needs, such as the Annual Progress Report and program reports (within reason and within constraints of budget and other duties).

#### **IV. Satisfactory Assurances Regarding Confidentiality and Security:**

It is understood that CCCS will receive from HMIS partner's client information that may be subject to the privacy and security protections and requirements of HUD HMIS Standards, HIPAA Privacy Rule, other law, and local HMIS privacy and security policies and procedures. CCCS hereby agrees that it will use protected client information only for purposes permitted by agreement with Partner Agencies, the CoC Lead Agency, state or federal entities, and as permitted by the applicable law and Standards. Further, CCCS agrees it will make use of all safeguards required by HUD Privacy Standards, HIPAA Privacy Rule, where appropriate, other law, and local HMIS privacy and security policies and procedures in order to prevent any unauthorized disclosure of protected client information.

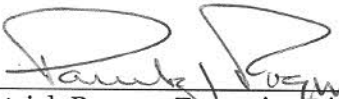
#### **E. Period of Agreement and Modification/Termination**

1. **Period of Operation and Termination:** This MOU will become effective upon signature of the parties and shall remain in effect until terminated by the parties. Each party shall have the right to terminate this agreement as to itself only upon 90 days prior written notice to the NY-501 Regional Continuum of Care, in care of the Institute for Human Services. Violation of any component may be grounds for immediate termination of this Agreement.

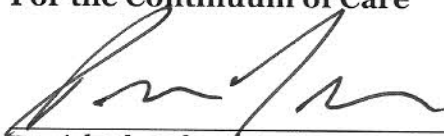
2. **Annual Review Period:** The terms and conditions of this MOU shall be reviewed annually, beginning sixty (60) days prior to the anniversary of its execution, by both parties to this agreement. Any recommendations, amendments, additions, deletions, or required changes shall be presented to the CoC Board for consideration thirty (30) days prior to that anniversary date.
3. **Amendments:** Amendments, including additions, deletions, or modifications to this MOU must be agreed to by all parties to this Agreement.

**The signatures of the parties indicate their agreement with the terms and conditions set forth in this document.**

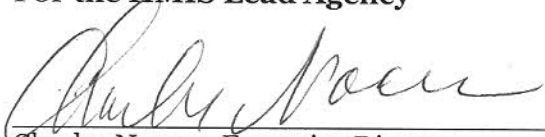
**For the CoC Lead Agency**

  
\_\_\_\_\_  
Patrick Rogers, Executive Director  
*Institute for Human Services, Inc.*

**For the Continuum of Care**

  
\_\_\_\_\_  
Patrick Thrush, CoC Director  
*NY-501 Regional Continuum of Care*

**For the HMIS Lead Agency**

  
\_\_\_\_\_  
Charles Nocera, Executive Director  
*Catholic Charities of Chemung & Schuyler Counties*

**NY-501 Regional Continuum of Care  
City of Elmira, Steuben, Allegany, Livingston, Chemung, Schuyler Counties**

**FY2013 CoC Application Process Plan and Timeline**

**Background and Introduction**

*Organization of the NY-501 Regional Continuum of Care*

The NY-501 Regional Continuum of Care is comprised of five predominantly rural counties and the City of Elmira in the Southern Tier/Finger Lakes region of New York State, and represents diverse populations, needs, and capabilities. The Institute for Human Services, Inc. (IHS), and Catholic Charities of Chemung & Schuyler Counties serve as the lead agencies for the CoC and HMIS, respectively. Representatives from a mix of homelessness service agencies form a CoC Board that guides the planning and implementation efforts of the Continuum which are then executed through full time Administrators at each of the Lead Agencies. For details about the roles and responsibilities of the various NY-501 Regional CoC committees and workgroups, please refer to the CoC Operating Policies manual.

**HUD's Continuum of Care Homeless Assistance Program and the Continuum of Care Application**

Every year, the U.S. Department of Housing and Urban Development (HUD) provides federal resources for homeless programming through its Continuum of Care (CoC) Homeless Assistance Program. Continuums access these funds by completing an annual Continuum of Care (CoC) application on behalf of all the federally funded homeless programs in their community. IHS and the CoC Administrator coordinate the process and prepare the consolidated application for funding for the Continuum; also serving as the Collaborative Applicant. Any organization located within the 5 counties of the NY-501 Regional CoC that wishes to access CoC funds must be a member of the Continuum; participate in local homeless planning efforts and the HMIS System; and coordinate with the annual NY-501 Regional CoC Application process to do so.

**Purpose of this Document**

This document is intended to provide NY-501 Regional CoC members with basic information about the NY-501 Regional CoC process and priorities for the submission of the FY2013 consolidated CoC application. It also meets the requirements set forth in the FYFY2013 CoC Program NOFA.

## **FYFY2013 NY-501 Regional CoC Application Overview**

### *Goals for FY2013 NY-501 CoC Application*

The NY-501 CoC Lead Agency has identified the following goals for the FY2013 NY-501 Regional CoC application for HUD CoC funding:

- Submit an application that meets threshold and maximizes available funding
- Investigate wherever possible reallocation of existing TH projects to RRH
- Continue projects that meet community needs in underserved areas
- Fund projects that utilize best practices
- Fund projects that contribute to *reducing* homelessness

### **Key Changes in the FY2013 CoC Program NOFA**

- The FY2013 CoC Program competition is the first to have a combined NOFA which will also apply to FY2014 submissions.
- Any leverage demonstrated in the Project Applications must have an executed MOU attached to the application at time of submission.
- All CoC project applications will be ranked within two funding tiers. The HUD certified ARD (regular ARD minus 5%) forms the ceiling for Tier I and roll-off point to Tier II.
- Except for recapture to be distributed according to Collaborative Application debriefing scores, it is unlikely that any Tier II programs will be funded this round.
- Due to sequestration cuts, no new or bonus projects will be considered—only reallocation of existing projects to new RRH projects.

### **NY-501 Consolidated CoC Application Submission**

The consolidated application is comprised of two primary parts. The first part is the CoC Application which includes information about how the Continuum is organized, how well it is performing, and its plans to continue reducing/ending homelessness. The CoC application is completed and submitted by the CoC Lead Agency, IHS on behalf of the NY-501 Regional CoC. The second part of the consolidated application includes all Continuum member new and renewal project applications. Grantees/applicants complete these project applications and submit them to the Collaborative Applicant, via HUD e-snaps. Submitted projects are ranked by priority and need by an internal Project Priority and Ranking Team. The results of this ranking are presented to the full CoC

body comprised of the executive Board and the General Membership. The CoC body then votes to accept or reject the ranking list. If accepted, IHS then submits a Project Priority Listing via eSNAP on behalf of the NY-501 Regional CoC and project applicants.

***All CoC program grantees within the NY-501 Regional CoC are responsible for submitting their individual project applications to e-snaps, and immediately providing the CoC Director with an exported PDF of the project. In addition, applicants must submit along with their applications to the Lead Agency a Project Summary Sheet and a Leveraging worksheet. NY-501 projects must use the process and timeframe laid out in this document to submit their project applications. NY-501 project applications will be due to IHS via e-snaps well before the consolidated application is due to HUD..***

HUD released the Notice of Funding Availability (NOFA) for the CoC Program, which includes the consolidated application, on November 22, 2014. There is a CoC deadline for submission of all CoC Project applications by January 3, 2014. The NY-501 Regional CoC consolidated application is due to HUD with a deadline of February 3<sup>rd</sup>, 2014. The NOFA announcement and related other materials can be found here:

<https://www.onecpd.info/news/the-fy-FY2013-fy-2014-coc-program-competition-is-now-open/>

#### *Project Application Submission*

HUD released and will continue to issue guidance for the FY2013 application on the OneCPD CoC Program Competition page, and announce important items on the OneCPD mailing list. This includes all handbooks, guidance, FAQ's, and webinar materials. The Competition page is to be found here:

<https://www.onecpd.info/e-snaps/fy-FY2013-coc-program-nofa-coc-program-competition/>

#### *New CoC Project Applications*

New projects are allowable in FY2013 if they are a reallocation of existing projects into a new Rapid Rehousing project (RRH). All such projects being considered must confer with the CoC Lead Agency and their field officer at the Buffalo HUD field office prior to preparing a grant submission.

## **CoC Application Training and Technical Assistance**

### *CoC Application Training & Webinar*

IHS will host several classroom trainings on the updated CoC application process, FY2013 NOFA requirements, Leveraging, and completing the grant submission. Trainings will be held on Monday, December 9, 2013 at 9AM and 1PM. Location is the Institute of Human Services conference room in Bath, NY. The class will be repeated as an interactive webinar on Friday, December 13<sup>th</sup> at 1PM via an interactive GoToMeeting webinar. Please contact the CoC Director to register for this webinar if you are unable to attend an on-site training.

It is critical that all organizations submitting a new or renewal project application participate in this webinar. **Please note, only project applicants that have participated in one of these trainings will be considered for submitting applications to the Continuum.**

### *Project Application Technical Assistance*

In addition to participating in the November 9<sup>th</sup> training or webinar, NY-501 grantees are encouraged to read all relevant guidance materials available at the HUD OneCPD website. HUD has created numerous documents to help grantees learn about e-snaps and successfully submitting project applications. In addition, organizations such as the [National Alliance to End Homelessness](#) and the [U.S. Interagency Council on Homelessness](#) may offer technical guidance materials and webinars that are of critical importance in understanding NOFA requirements and programmatic changes.

NY-501 grantees/applicants can contact Patrick Thrush, CoC Director, at [coc@ihsnet.org](mailto:coc@ihsnet.org) with any questions about project applications or the NY-501 FY2013 CoC application process. The CoC Lead Agency is unable to provide technical assistance that would constitute direct participation in any applicant's project submission, or lend unfair advantage to any single applicant.

Grantees/applicants should review all relevant HUD guidance prior to contacting Mr. Thrush for assistance—and per HUD Buffalo Field Office request, file all technical assistance questions with the HUD HRE Helpdesk prior to contacting IHS or the Field Office directly. If sufficient interest is expressed by applicants in a particular facet of completing their applications, specialized trainings may be provided and made available to all applicants.

### *Project Application Submission Process*

The following application submission process applies to all renewal and approved new CoC projects in the NY-501 Regional CoC. Late submission of project applications could result in exclusion from the NY-501 Project Priority Listing submission to HUD.

### *Submit Project Application in e-snaps*

NY-501 Regional CoC grantees MUST complete their project applications in e-snaps and email a PDF of the submitted application, a Project Summary sheet, and Project Leveraging Worksheet to Patrick Thrush, CoC Director at [coc@ihsnet.org](mailto:coc@ihsnet.org) by 7:59PM, Friday, December 3<sup>rd</sup>, 2014. This involves properly completing all sections of the project application and hitting the 'submit' button on the submission summary page of the project application.

### *Correct Project Application and Re-Submit*

The Lead Agency will review each project application and notify grantees by email of any discrepancies, omissions, or needed corrections by Friday, January 10<sup>th</sup>, 2014. Mr. Thrush will release relevant project applications back to grantees for corrections at that time as well. If no corrections are needed, grantees will be notified via email that their project application was acceptable—these grantees have completed their project application at this point.

All grantees must submit their corrected project application in e-snaps and email a PDF of the application along with updated Summaries and Worksheets to [coc@ihsnet.org](mailto:coc@ihsnet.org) by 11:30PM, Wednesday, January 15<sup>th</sup> 2014. The submissions will then be readied for ranking by the Project Priority Ranking Team on Friday, January 17<sup>th</sup>, 2014.

### *Supplementary Information*

In addition to the project application, some additional information/documents may need to be provided to IHS or kept on file for the project. The following section identifies the various supplementary items that grantees and applicants must attend to.

### *Annual Performance Reports*

All CoC program grantees are required to submit Annual Performance Reports (APRs) to HUD and the NY-501 Regional Continuum of Care. The process for NY-501 grantees to complete and submit APRs is laid out in the NY-501 Regional CoC Policies and Procedures, '*Annual Performance Reports: Review and Submission.*'

Some grantees in the NY-501 Regional CoC will need to complete a Certification of Consistency with their local Consolidated Plan. Currently this includes Allegany & Steuben Counties, and the City of Elmira. If your community this, you will be provided the necessary forms to complete the certification by your county official and email a scanned copy of the Certifications to [coc@ihnet.org](mailto:coc@ihnet.org) by January 15<sup>th</sup>, 2014.

The original Certification(s) must also be mailed to:

Patrick Thrush  
CoC Director  
6666 County Road 11  
Bath, NY 14810

### **Documentation of Project Leverage**

In FY2013, HUD will award greater points to CoC consolidated applications that have at least 150% leverage across all project applications. To this end, NY-501 Regional CoC grantees and applicants are strongly encouraged to demonstrate at least 150% leverage (cash and in-kind) for their projects. Renewal projects that document at least 150% leverage will receive 5 points for this item when scored (scoring method is described in more detail below) for Priority Ranking. Additional bonus points are awarded for higher leveraging amounts.

NY-501 grantees and applicants are required to have on file match and leverage commitment letters by the time project applications are submitted. Per the FY2013 NOFA, match and leverage MOU letters cannot be signed prior to the issuance of the NOFA (November 22, 2014) nor later than the close of the NOFA submission deadline (February 3<sup>rd</sup>, 2014). These commitment letters do NOT need to be submitted to IHS at this time. However, copies of commitment letters may be requested at a later point, and are required to be submitted if a project application is funded.

### ***Education Policies***

All projects serving homeless families are required to ensure that their program policies and procedures are consistent with the laws related to providing education services to homeless individuals and families. Additionally projects serving families are required to have a designated staff person to ensure that children are enrolled in school and receive educational services as appropriate. These written policies do NOT need to be submitted to IHS at this time. However, copies may be requested at a later point—and



IHS and the CoC Director will provide proper guidance for submitting this documentation.

### *Funding Availability for FY2013 NY-501 CoC Projects*

In the FY2013-14 CoC NOFA, HUD announced that \$1.7 billion is available to fund renewal and new projects through reallocation nationally. This amount will not be enough to fund all renewal projects at their full annual renewal demand (ARD) amounts, as identified in the FY2013 Grant Inventory Worksheet (GIW), and will not be enough to fund typical new or bonus projects. This is due to the 5% sequestration that Congress imposed on many federal funding programs including the FY2013 Transportation, Housing & Urban Development (THUD) budget.

The NY-501 Regional CoC has \$1,461,592 apportioned to it after the sequestration cut for renewal projects ranked in Tier I. More information on Tier 1 and Tier 2 is below. To fully fund all renewal projects at the full amounts listed in the FY2013 GIW, the NY-501 Regional CoC would need \$1,538,518 (our initial ARD amount). This represents a \$76,926 shortfall.

Because of funding shortfalls, HUD is requiring all CoCs to rank projects within two funding tiers. Tier 1 is set by ceiling, the sum of all ranked projects up to the sequestration adjusted ARD apportionment of \$1,461,592. Tier II is any project that exceeds the Tier I ceiling, as well as any applications for CoC planning costs. Projects which straddle Tier I & Tier II are automatically deprecated to Tier II. Applicants should consider a variety of strategies for reducing or reallocating their budgets this round.

### *Renewal Project Funding*

To preserve all renewal projects, the Lead Agency (IHS) is recommending ranking all applicants to consider a variety of individual and collaborative strategies for reducing or reallocating their budgets this round. It is certain that guidance will be made available by HUD and national TA providers on how to best strategize approaches.

### *New Project Funding*

HUD has announced that new project applications for FY2013 will be limited to the reallocation of existing Transitional Housing (TH) programs into Rapid Rehousing model (RRH) only. Those considering the reallocation process should contact their HUD field officer for more details.

### *CoC Planning Costs Funding*

HUD is again making available limited funds for CoC planning costs. HUD has established a maximum NY-501 Regional CoC request up to \$19,231. Only the Collaborative Applicant can apply for the CoC planning costs and, as mentioned above, IHS is the Collaborative Applicant for the NY-501 Regional CoC.

The NY-501 Regional CoC Board has decided to have IHS submit an application for available CoC planning costs. The application will be included in Tier 2 in accordance with HUD guidance in the NOFA.

### *Project Application Listing in the Consolidated Application*

In FY2013, HUD is requiring that CoCs rank ALL project applications within two funding tiers (Tier 1 and Tier 2). As mentioned previously, the CoC Program appropriation is only enough to fund projects ranked within Tier 1. However, as HUD recaptures unspent funds from current CoC projects, additional money may be identified to fund some projects within Tier 2. Allocation of these funds will be based upon the score received by each state CoC on its Collaborative Application. Because of this possibility of some projects losing funding, HUD is requiring that CoCs develop their own process for ranking projects within the two funding tiers—subject to HUD priority project areas. The NY-501 Regional CoC Lead Agency has determined that in order to appropriately rank renewal project applications, all applications must first be scored on some key items.

### **Scoring and Ranking of Project Applications**

#### *Renewal Project Scoring and Ranking*

The NY-501 Regional CoC Lead Agency has determined to score projects in three categories of evaluation. Prior to scoring, projects will be grouped into like types, as shown at the bottom of the criteria list. Two project priority groupings are shown. The first will be used in the case of the total ARD for projects exceeding the Tier I threshold; the second and aligned with HUD project type priorities if all projects fall within the Tier I ranking. The CoC Project Planning Grant application will be placed in Tier II in either case.

Performance data for all goals (except for leverage) will be pulled from APR submissions and HMIS data. Performance on the leverage goal will be obtained from renewal project applications. The scoring as follows for a maximum of 75 points:

## RENEWAL PROJECT SCORING CRITERIA

### A. Business & Reporting Operations

1. Project met FY2012 APR benchmarks—5 Points
2. Project drew down funds in a timely manner—5 Points
3. Project has no outstanding HUD findings—5 Points
4. Project HMIS Data Quality at or above 90%—5 Points
5. Project renewal application submitted by internal deadline—5 Points
6. Renewal grantees elected budget strategies to preserve projects—5 Points

### B. Project Characteristics

1. Total units priority designated for chronically homeless 85% or more—5 Points
2. Total project leverage meeting a 150% threshold—5 Points
3. Bonus—Leverage and additional in-kind is 250% or more—5 Points
4. Bonus—Leverage and additional in-kind is 500% or more—5 Points
5. Project size greater than 20 units/beds—5 Points
6. Project specifically targets disabled persons as a served population as specified in the grant application—5 Points
7. Project fills critical housing need where no alternative resource is available—5 Points

### C. Project Performance

1. If permanent housing, percent at or above 75% projected to remain housed longer than 6 months—5 Points
2. If transitional housing, percent at or above 80% projected to move to permanent housing—5 Points

### Maximum Points=75

Priority if Tier II Contains Projects	Priority if Tier II Does Not Contain Projects
<i>Project Ranking Priority Groups—Tier I</i> <ol style="list-style-type: none"><li>1. Permanent Supportive Housing</li><li>2. HMIS</li><li>3. Transitional Housing</li></ol>	<i>Project Ranking Priority Groups—Tier I</i> <ol style="list-style-type: none"><li>1. Permanent Supportive Housing</li><li>2. Transitional Housing</li><li>3. HMIS</li></ol>
<i>Project Ranking Priority Groups—Tier II</i> <ol style="list-style-type: none"><li>1. CoC Planning</li><li>2. Transitional Housing</li></ol>	<i>Project Ranking Priority Groups—Tier II</i> <ol style="list-style-type: none"><li>1. CoC Planning</li><li>2. Transitional Housing</li></ol>

Highest scoring projects will be ranked at the top of the list within Tier 1, and lowest scoring projects toward the bottom. When projects' scores are tied, projects will be elevated based upon critical community need and project size.

### *New Project Scoring and Ranking*

New reallocation projects will receive the same scoring points—carrying performance metrics over from the original projects.

### *Project Priority Ranking Team Scoring & Appeal Process*

The Project Priority Ranking Team will meet on Tuesday, January 21, 2014 to score and certify a Project Rank List. Applicants will be notified in writing of the scoring results immediately following the Team meeting.

Any application rejected from the list may be appealed by the applicant any time before January 27, 2014 by notifying the CoC Director in writing of their objection, and the reasons they believe the application should be reconsidered. A review decision will be made no later than January 29, 2014 and the applicant notified of the findings in writing. The decision rendered at that time is final.

### *Final Submission of the NY-501 CoC Consolidated CoC Application*

The Priority List shall be approved by the CoC Board and General Membership at a meeting to be held on Friday, January 31, 2014. If approved by that body, the HUD Priority Listing will be electronically submitted via e-snaps to HUD. The Collaborative Application will be submitted via e-snaps to HUD on or before the NOFA closing date of February 3, 2014 at 7:59PM EST.

Any questions about the FY2013 CoC Application Process Plan or Timeline can be directed to:

Patrick Thrush, CoC Director, at [coc@ihsnet.org](mailto:coc@ihsnet.org) or 607-438-3400.

The following Ranking Report was released to the FY2013 applicants on the afternoon of January 21, 2014 after the Priority Ranking Team certified the Scores.



## CoC Program FY2013 Project Priority Ranking

### **Tier I**

#### *Permanent Housing*

1. PHP Permanent Housing Project—CCCS
2. Permanent Housing Project—CCCS
3. OMH/Gateways S+C—NYS OMH/CCCS
4. HSH—CCCS
5. SHP Permanent Housing P1 Schuyler—CCCS
6. Steuben County CoC S+C—Steuben County/Arbor

#### *Transitional Housing*

7. Project Share—CCCS
8. ACCORD Transitional Housing Program--ACCORD
9. SHP Transitional Housing P1 Schuyler—CCCS
10. Livingston Supportive Housing—Arbor
11. ACCORD Supportive Housing Program--ACCORD
12. Transitionals to PSH--Arbor

#### *HMIS*

13. HMIS—CCCS
14. New HMIS—CCCS

### **Tier II**

15. CoC Program Planning Grant—IHS

---

**TOTAL PROJECT ANNUAL RENEWAL DEMAND=\$1,460,169.00**

## **Before Starting the Project Listings for the CoC Priority Listing**

Collaborative Applicants must rank or reject all Project Applications –new projects created through reallocation, renewal projects, CoC planning projects, and UFA Costs projects - submitted through e-snaps from project applicants prior to submitting the CoC Project Listings.

Additional training resources are available online on the CoC Training page of the OneCPD Resource Exchange at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>.

### **Things to Remember**

- There are four separate forms in e-snaps that make up the Priority Listings, which lists the new projects created through reallocation, renewal, CoC planning, and UFA Costs project applications that the Collaborative Applicant intends to submit on behalf of the CoC. The Priority Listing ranks the projects in order of priority and identifies any project applications rejected by the CoC. All renewal and new projects created through reallocation, CoC planning, and UFA Costs project applications must be accepted and ranked or rejected by the Collaborative Applicant. Ranking numbers must be unique for each project application submitted.
- Collaborative Applicants are strongly encouraged to list all project applications on the FY2013 CoC Ranking Tool located on the OneCPD Resource Exchange to ensure a ranking number is used only once. The FY 2013 CoC Ranking Tool will assist the Collaborative Applicant during the ranking process among the four Project Listings.
- Any project applications rejected by the Collaborative Applicant must select the reason for rejection.
- Collaborative Applicants are required to notify all project applicants no later than 15 days before the application deadline regarding whether their project applications would be included as part of the CoC Consolidated Application submission.
- If the Collaborative Applicant needs to amend a project for any reason after ranking has been completed, the ranking of other projects will not be affected; however, the Collaborative Applicant must be sure to rank the amended project once it is returned to the Project Listing and verify that the rank number assigned has not been assigned to another project on a different Project Listing.
- Only 1 CoC Planning project can be ranked on the CoC Planning Project Listing.
- Only 1 UFA cost project can be ranked on the UFA Cost Project Listing.

**The Collaborative Applicant MUST submit both this CoC Project Listing AND the CoC Application by the HUD submission deadline in order for the CoC Consolidated Application submission to be considered complete**

## 1A. Continuum of Care (CoC) Identification

### Instructions:

The fields on this screen are read only and reference the information entered during the CoC Registration process. Updates cannot be made at this time. If the information on this screen is not correct, contact the One CPD Resource Exchange Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**Collaborative Applicant Name:** Institute for Human Services, Inc.



## Continuum of Care (CoC) New Project Listing

### Instructions:

Prior to starting the CoC New Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Instructions" and the "CoC Project Listing" training module, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>

To upload all new project applications that were created through reallocation and have been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes based upon the number of new projects created through reallocation that need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review a project on the New Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

**EX1\_Project\_List\_Status\_field** List Updated Successfully

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Rank	Comp Type
This list contains no items						

## Continuum of Care (CoC) Renewal Project Listing

### Instructions:

Prior to starting the CoC Renewal Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Instructions" and the "CoC Project Listing" training module, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>

To upload all renewal project applications that have been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes based upon the number of renewal projects that need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review a project on the Renewal Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

**The Collaborative Applicant certifies that there is a demonstrated need for all renewal permanent supportive housing and rapid re-housing projects listed on the Renewal Project Listing.**

☒

**The Collaborative Applicant does not have any renewal permanent supportive housing or rapid re-housing renewal projects.**

☐

### EX1\_Project\_List\_Status\_field

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Rank	Comp Type
PHP Permanent Hou...	2014-01-02 12:45:...	1 Year	Catholic Charitie...	\$43,544	W1	PH
Permanent Housing...	2014-01-02 12:51:...	1 Year	Catholic Charitie...	\$102,717	W2	PH
HMIS	2014-01-02 13:01:...	1 Year	Catholic Charitie...	\$46,296	W14	HMIS
HSH	2014-01-02 12:42:...	1 Year	Catholic Charitie...	\$147,117	W4	PH
SHP Transitional ...	2014-01-03 16:21:...	1 Year	Catholic Charitie...	\$64,949	W9	TH
Project Share	2014-01-02 12:56:...	1 Year	Catholic Charitie...	\$92,306	W7	TH

SHP Permanent Hou...	2014-01-03 16:14:...	1 Year	Catholic Charitie...	\$42,921	W5	PH
New HMIS	2014-01-02 12:58:...	1 Year	Catholic Charitie...	\$100,058	W13	HMIS
OMH/Gateway s 2013...	2014-01-03 09:39:...	1 Year	NYS Office of Men...	\$208,277	W3	PH
SHP Supportive Ho...	2014-01-28 13:39:...	1 Year	Allegany County C...	\$50,600	W11	TH
SHP Transitional ...	2014-01-28 14:56:...	1 Year	Allegany County C...	\$40,107	W8	TH
Livingston Suppor...	2014-01-31 15:39:...	1 Year	Steuben Churchpeo...	\$51,134	W10	SH
COC S+C	2014-01-31 16:04:...	1 Year	Steuben County	\$410,583	W6	PH
Transistionals to...	2014-01-31 15:35:...	1 Year	Steuben Churchpeo...	\$69,032	W12	TH

## Continuum of Care (CoC) Planning Project Listing

### Instructions:

Prior to starting the CoC Planning Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Instructions" and the "CoC Project Listing" training module, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>

To upload the CoC planning project application that has been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes as the project will need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review the CoC Planning Project Listing, click on the magnifying glass next to view the project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

If more than one CoC planning project was submitted, the Collaborative Applicant can only approve one CoC planning project (which must be submitted by the Collaborative Applicant) and reject all other CoC planning projects.

### EX1\_Project\_List\_Status\_field

Project Name	Date Submitted	Project Type	Applicant Name	Budget Amount	Grant Term	Rank	Comp Type
NY-501 FY2013 CoC...	2014-02-02 06:35:...	--	Institute for Hum...	\$18,124	1 Year	C15	CoC Planning Proj...

## Funding Summary

### Instructions

For additional information, carefully review the "CoC Priority Listing Instructions" and the "CoC Priority Listing" training guide, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>.

This page contains the total budget summaries for each of the project listings for which the Collaborative Applicant approved and ranked or rejected project applications. The Collaborative Applicant must review this page to ensure the totals for each of the categories is accurate. The "Total CoC Request" indicates the total funding request amount the Collaborative Applicant will submit to HUD for funding consideration. As stated previously, 1 UFA Cost project and only 1 CoC Planning project can be submitted and only the Collaborative Applicant is eligible to request these funds.

Title	Total Amount
Renewal Amount	\$1,469,641
New Amount	
Reallocated Amount	
CoC Planning Amount	\$18,124
UFA Costs	
Rejected Amount	\$0
<b>TOTAL CoC REQUEST</b>	<b>\$1,487,765</b>

**Maximum CoC project planning amount: \$19,231**

## Submission Summary

Page	Last Updated
<b>Before Starting</b>	No Input Required
<b>1A. Identification</b>	01/23/2014
<b>2A. CoC New Project Listing</b>	No Input Required
<b>2B. CoC Renewal Project Listing</b>	02/02/2014
<b>4A. CoC Planning Project Listing</b>	02/02/2014
<b>Submission Summary</b>	No Input Required

# Homelessness Management Information System [HMIS] Data Quality Plan

## NY-501 Regional Continuum of Care

*City of Elmira, Steuben, Allegany, Livingston, Chemung &  
Schuyler Counties*



**February 3, 2014**

**Developed by:**

Jim Cantrill, HMIS Administrator

Catholic Charities of Chemung/Schuyler Counties

*HMIS Lead Agency*

215 East Church Street Elmira, NY 14901

(607) 734-9784 [jcantrill@dor.org](mailto:jcantrill@dor.org)

## Data Quality Standards Authorization Memorandum

I have carefully assessed the Data Quality Standards for the NY-501 Regional Continuum of Care, (Continuum).

As authorized representatives of the Continuum of Care and the Homeless Management Information System (HMIS), we accept the Data Quality Standards as reasonable expectations for data entry and management regarding the NY-501 Regional Continuum's designated Homeless Management Information System (HMIS). Based on our authority and judgment, the adoption of this Standard and its inclusion in the Continuum's policies and procedures is authorized.

---

James E. Cantrill

HMIS Project Administrator

---

DATE

---

Chuck Nocera

HMIS Lead Agency Director

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DATE

---

Patrick Thrush

CoC Administrator

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DATE

---

Debra MacDonald

2012 CoC Chair

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DATE



## **Data Quality Standards Authorization Memorandum – CoC Membership**

I have carefully assessed the Data Quality Standards for the NY-501 Regional Continuum of Care (Continuum).

I accept the Standards as reasonable expectations for data entry and management regarding the Continuum's designated Homeless Management Information System (HMIS), and support the adoption of this Standard.

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Lynne Faeke  
Accord Corporation

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DATE

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Marcia Ribble  
Vice President- Support Services  
Arbor Housing and Development

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DATE

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Chuck Nocera  
Interim Executive Director  
Catholic Charities of Chemung and Schuyler Counties

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DATE

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Lisa Baker  
Director of Temporary and Disability Assistance  
Steuben County Department of Social Services (DSS)

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DATE

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## **General Information**

This document is the data quality plan for the Homeless Management Information System (HMIS) of the NY-501 Regional Continuum of Care, hereafter Continuum, developed in compliance with the guidance and proposed regulations from HUD.

### ***What is a Data Quality Plan?***

A Data Quality Plan is a set of standards, guidelines, responsibilities, and procedures that will help our Continuum's programs enter high quality data into our HMIS. This Data Quality Plan documents and standardizes the expectations of our communities for the reliability and validity of the data about the homeless and people at risk at homelessness in our area. It will also provide guidance to our HMIS participating programs in improving the quality of the data they enter into our HMIS.

Our Data Quality Plan will:

- Establish specific data quality standards and benchmarks for timeliness, completeness, accuracy, and consistency of the data entered into our HMIS.
- Identify the responsibilities for data quality of all parties within our Continuum.
- Describe how the HMIS Lead Agency will implement the plan and monitor data quality progress
- Establish a timeframe for implementing the plan and monitoring the data quality regularly.

### ***Development Process***

This Data Quality Plan for the Continuum's HMIS was developed through a collaborative effort of our Continuum. The draft document was prepared by the HMIS Administrator and circulated for review and comment to all COC members. The draft was revised in light of their comments. The review and comment and revision process was repeated until a consensus was obtained and the final Data Quality Plan was approved by the Continuum's leaders.

### ***Definition of Data Quality***

HMIS data quality refers to the extent that data recorded in the STEPS HMIS accurately reflects the same information in the real world. We set forth in this data quality plan the standards, benchmarks, measures, and activities required to meet our Continuum's goal of presenting accurate and consistent information on homelessness. Specifically, our goal is to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent of homelessness, the risk of homelessness, and the impact of our services for the homeless and those at risk of homelessness.

### ***Why Data Quality Is Important***

Quality data is data that is accurate and complete. We rely on quality data to make accurate statements and conclusions about the people we serve and our program's outcomes. We use such statements and conclusions to make important decisions about our programs and

community needs. Without quality data we can make the wrong decisions and fail to serve people in need.

Running our programs depend on reports displaying accurate and complete information. Our funding sources need these reports to evaluate our performance, plan for program improvement, set future funding levels, and find needs not being met. Our management needs these reports to assess the performance of each program, to set the future funds needed for existing and new programs, to highlight service process improvements, and to determine training needs. Our communities need these reports to understand the overall needs of homeless and other needy people, to find people who need help, and to add community resources where they are needed. With accurate and complete data we can better serve our community; without it, we can fail.

Tolerating missing or wrong identifiers make unduplicated counts unreliable, causing us to misstate our performance, to under or over count the people we serve, and to make mistakes in our funding applications.

Entering inaccurate or incomplete client profiles give a false picture of our client's demographics, causing us to misdirect resources, to set wrong priorities and to miss people who need services.

Complete entry and exit data are important; incomplete data causes us to misunderstand how people move in and out of the homeless system and other programs, and to fail to see what combinations of services are most effective in helping our people.

### ***Homeless Management Information System (HMIS)***

An HMIS is a locally administered, electronic data collection system that stores longitudinal person-level information about the men, women, and children who access homeless and other human services in a community. Each Continuum receiving HUD funding is required to implement an HMIS to capture standardized data about all persons accessing the homeless assistance system. This requirement is set forth in 24 CFR Parts 91, 576, 580, and 583.

The Continuum designates a single software system as the HMIS for its geographic area from among those systems complying with the requirements and standards for an HMIS. The Continuum has designated the AWARDS system supplied by Foothold Technology and all modules, assessments, and reporting functionality contained therein.

All HMIS data are entered using the AWARDS software; there are no legacy systems providing data for importing into the AWARDS system.

### ***Continuum's HMIS Committee***

The Continuum's duties in overseeing the HMIS are carried out by the HMIS committee which is open to all active continuum members. The HMIS Committee's data quality responsibilities are to review, revise, and approve the data quality plan developed by the HMIS Lead and to monitor the overall data quality of the HMIS.

### ***HMIS Lead***

The HMIS Lead is an entity designated by the Continuum to operate the HMIS. Its duties include:

- Ensuring the consistent operation of the HMIS system in compliance with all applicable requirements
- Ensuring that each Contributing HMIS Organization (CHO) complies with all requirements and standards established for the HMIS
- Develop and review annually written policies, standards, and procedures for all CHOs and their programs. These include a data quality plan, a security plan, and a privacy policy.
- Develop and conduct periodic training on the proper use of the HMIS and complying with the standards and procedures
- Submitting reports to HUD as required

The HMIS Lead designates an HMIS Administrator to be the primary person responsible for carrying out its specified duties. Additional personnel are designated as needed. The HMIS Administrator and other personnel are referred to as the HMIS administration.

The Continuum has designated Catholic Charities of Chemung and Schuylar Counties as its HMIS Lead.

### ***Key Documents***

Key documents needed as supporting references to this document are listed below:

- Homeless Management Information System (HMIS) Data Standards, U.S. Department of Housing and Urban Development, Office of Community Planning and Development, March, 2010
- e-snaps CoC APR Guidebook, U.S. Department of Housing and Urban Development, April, 2012, Version 3
- e-snaps APR Guidebook For HMIS Dedicated Projects, U.S. Department of Housing and Urban Development, November 2011, Version 4
- HUD Supportive Housing Program (SHP) Notice of Funding Availability (NOFA)

### ***Definitions***

#### **Continuum of Care**

The group composed of representatives from organizations involved in sheltering, housing, or serving homeless people or people at risk of homelessness which is organized with the express purpose of performing the duties designated for a continuum of care as defined by the HEARTH Act of 2009 (P.L. 111-22) and subsequent regulation, expansions, and amendments..

#### **Contributing HMIS Organization (CHO)**

An organization that operates a project contributing data to an HMIS.

**Homeless Management Information System (HMIS)**

The information system designated by a Continuum of Care to record, analyze, and transmit all data about providing shelter, housing, and services to homeless people or people at risk of homelessness.

**HMIS Committee**

The Continuum's committee charged with carrying out the Continuum's responsibilities to make decisions about HMIS management and administration and to ensure that the HMIS for the Continuum of Care is operated in accordance with the provisions of the all applicable regulations and other laws.

**HMIS Lead**

An entity designated by a Continuum of Care to operate its HMIS

**HMIS Administrator**

The primary person designated by the HMIS Lead to carry out its duties

**User**

A person who uses or enters data into the HMIS

***Points of Contact***

Below is a list of Point of Contacts relevant to this Standard:

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NY-501 Regional Continuum of Care  
Institute for Human Services, Inc., CoC Lead Agency  
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Main: (607) 776-9467  
Office: (607) 438-3400  
Mobile: (607) 438-0771  
[coc@ihsnet.org](mailto:coc@ihsnet.org)

## **Data Quality Standards**

The data quality standards for the Continuum are defined by four dimensions, Timeliness, Completeness, Accuracy, and Consistency. The general standard outlined for each dimension is applicable to all HMIS participating programs with exceptions noted by specific program type. Unless otherwise noted, all participating programs, including those transferring data from legacy and supporting systems, are expected to achieve and maintain the defined standards.

### ***Timeliness***

If data isn't entered in a timely manner it won't be there when needed for measuring performance, analyzing problems, or reporting. The longer the time between collecting the data and entering it into the HMIS the greater is the likelihood of data entry errors. To minimize errors and have the data available when needed we define these timeliness standards and benchmarks.

#### **General Standard**

All programs will enter data into the HMIS as soon as possible after intake and admission, providing a service, reviewing a client, discharging a client from a program, or any other data generating event. Separate benchmarks are defined for each program group specifying the maximum time between collection and data entry.

In addition all participating programs will complete all data entry for any given month no later than the third working day of the following month.

#### **Specific Benchmarks**

##### **Emergency Shelters**

All emergency shelter programs shall enter all data, including intake, admission, service, and discharge data, within 24 hours of the data collection event.

##### **Transitional Housing**

All transitional housing programs shall complete entering all intake, admission, and discharge data within two days after the data collection event. They shall complete entering all service and progress note data within 24 hours after providing the service. For those programs using the HMIS for service planning and recording services all admission notes, service plans, and service plan reviews will be completed on or before the required due date.

##### **Permanent Supportive Housing**

All permanent supportive housing, shelter plus care and other permanent housing programs shall complete entering all intake, admission, and discharge data within two days after the data collection event. They shall complete entering all service and progress note data within 24 hours after providing the service. For those programs using the HMIS for service planning and recording services all admission notes,



service plans, and service plan reviews will be completed on or before the required due date.

### **Emergency Services and Other Services Only Program**

All emergency services and other services only programs shall complete entering all intake, admission, service, and discharge data within five working days after the data collection event.

### **HPRP, ESG, and STEHP Programs**

All HPRP, ESG, and STEHP programs shall complete entering all intake, admission, service, and discharge data within five working days after the data collection event.

All required data for a given quarter for HPRP, ESG, and STEHP programs must be entered into the HMIS no later than the close of business on the first business day of the following quarter. Quarterly reports for these program types must be completed on a very tight schedule, and we must require immediate data completion at each quarter's end.

### **Measuring Timeliness**

The timeliness of each data generating event will be measured by the time elapsed between the completion of a data generating event and the time the data was completely entered into the HMIS including any needed corrections.

The timeliness of all events in each event type will be measured by the maximum time elapsed during each reporting period.

The overall timeliness performance of a program, group of programs, or an agency is measured by the percent of event types whose maximum time elapsed is equal to or less than the benchmarks defined above.

These timeliness measures (maximum time elapsed and percent of events within the guidelines) will be monitored monthly using a set of data quality reports. On these reports we will also report the minimum, average, and median time elapsed for each data generating event type.

### ***Completeness***

When our data on clients, their demographic characteristics, and service use is incomplete it can lead to misleading information and misdirected or insufficient services. Without all relevant data we can't measure client needs and program outcomes accurately. Therefore we are defining the following completeness standard.

#### **General Standard:**

All programs must collect all the universal data elements defined by HUD as well as all the program specific data elements required for the program type or for outcome reporting as defined by our various funding agencies. We expect that there will be no missing data and a minimum of "Don't Know" or "Refused" responses. We expect that all programs will follow procedures in interviewing clients to encourage the client to provide all needed data. It is especially important that we do not tolerate any missing first and last names, social security numbers, or date of births

since we need this to provide unduplicated client counts. We recognize that clients can be reluctant to give their social security numbers, but all programs must reassure the clients that we keep this data confidential and must explain why we need this data.

### **Benchmark applies to all program types**

We expect that all programs will have no more than 3% of all required data elements missing, and that there will be no more than 5% “Don’t Know” or “Refused” entries for any required data element.

### **Measuring Completeness**

The basic measure of completeness of a data field is the number of missing entries (nulls) as a percent of the number of clients who should have an entry. We also measure the completeness of a data field by the number of “Don’t Know” and “Refused” entries as a percent of the number of clients who should have an entry.

We will measure the overall completeness of a program, a group of programs, or an agency by the percent of the required data fields whose missing and don’t know/refused measures meet the benchmarks defined above.

These measures along with the numbers of clients participating in or served by a program or agency will be monitored monthly using a set of data quality reports.

### ***Accuracy***

The purpose of accuracy is to ensure that the data housed in the Continuum’s HMIS is the best possible representation of reality as it relates to the homeless and people at risk of homelessness and the programs that serve them.

### **General Standard and Benchmark**

There are two parts to the general standards for accuracy, the first is agreement with the paper intake forms and supporting documents, and the second is checking the validity of the entered data.

For all Continuum programs there will be no disagreement between the supporting documentation and the entered data (100% accuracy). This standard will be monitored by periodic examining selected supporting documents and comparing their data to the data in the HMIS. For example, if on admission an employer documents that the client makes a certain income, the income entered at admission for that client is the same as that documented.

All data entered for the Continuum’s programs will be valid and there will be no conflicts among the fields, or between the fields and a program’s requirements. For example there will be no child veterans, no 125 year olds, no infant head of households, no pregnant men, etc. in our data.

### **Exceptions**

There are no exceptions to the general standard; it applies to all programs.

## **Measuring Accuracy**

The first measure of accuracy is the agreement of the HMIS data with the supporting documentation. Periodically reviewing this agreement by comparing the HMIS data with the documents is the responsibility of each agency and program.

The second accuracy measure, its validity and lack of conflicts, will be reported monthly in a set of reports covering the following comparisons.

- Client age is not negative or over 100
- Client's date of birth is the same as their admission date
- Client's veteran status is inconsistent with their age
- Client's pregnancy status is inconsistent with their gender
- Client's pregnancy status is inconsistent with their age
- Client's head of household designation is inconsistent with their age
- Client's relationship to the head of household is inconsistent with their gender
- Client's relationship to the head of household is inconsistent with their age
- Client's receiving SSI or SSDI is inconsistent with their "no" answer to "Disabling Condition"
- Client's designation as having a specific disability is inconsistent with their "no" answer to "Disabling Condition"
- Client's "yes" answer to "Disabling Condition" is inconsistent with all "no" answers or nulls to the specific disability questions
- Client's first name is "Husband," "Wife," "Man," "Woman," "Boy," "Girl," "Child," "Baby," "Baby Girl," or "Baby Boy"
- Client's name fields have numbers in them
- Client's last name field has the suffix in it
- Client's social security number is invalid as defined by the Social Security Administration

Additional comparisons will be added as needed.

## ***Consistency***

Consistency means that all users of the HMIS have a common understanding of the meaning of all fields and of which fields need completion.

### **General Standard:**

All users of the Continuum's HMIS understand and interpret the required fields the same way.

### **Exceptions:**

There are no exceptions to the general standard; it applies to all programs

### **Consistency Measures**

We measure consistency by significant differences in the characteristics of data entered by different users or for different programs or agencies. Our client populations share many of the same characteristics and significant differences in these characteristics indicate possible inconsistency in interpreting the meaning of the data fields.

We will monitor consistency monthly using a set of data quality reports.

## **Monitoring**

We monitor the data quality to ensure that the standards defined in this document are met to the greatest possible extent and that data quality issues are quickly identified and resolved. The quality of data in the Continuum's HMIS will be monitored at least monthly.

### ***Monitoring Responsibilities***

The management of the programs and agencies are primarily responsible for monitoring the quality of their data. They should request or run (if they can) the data quality reports needed to monitor their programs monthly. They are also responsible for ensuring that data quality errors are promptly corrected. They look to the HMIS staff for the availability of the reports they need, for training on data standards, and for configuring their programs data entry screens to minimize errors.

The users entering the data are responsible for entering the data accurately and for correcting errors when discovered. They should constantly monitor their data entry performance so that they can catch data entry errors immediately. They should understand the data quality standards and the meaning of all data entry fields. They should understand in depth and detail how to use the AWARDS HMIS system. They look to their program and agency managers to see that they receive the training they need

The Continuum and its HMIS sub-committee are responsible for monitoring the overall data quality of the HMIS and of each contributing agency. They should review data quality reports at the agency and continuum level to ensure that overall data quality performance meets our standards. They look to the HMIS Administrator to provide the needed data quality reports and to develop and administer data quality training as needed.

The HMIS Administrator is responsible for leading the adoption, review, and revision of data quality standards for the Continuum, for developing data quality reports and making them available, preparing Continuum wide and agency wide data quality reports for review by the HMIS Sub-committee, for developing and conducting data quality training, and for configuring the programs to minimize data entry errors.

### ***Data Quality Standard Reports***

A well designed set of data quality reports is essential to monitoring and improving the quality of data in the Continuum's HMIS. The HMIS Administrator will develop the set of reports listed during the implementation of this plan, and we will continue to develop other data quality reports as our needs and activities change.

### **Data Quality Summary Reports**

The heart of this set of data quality summary reports displays each required field along with the number and percent of its missing and don't know/refused values and whether or not these measures meet the benchmarks. In addition the report also displays the number of clients served broken down by client and household type, and an overall percent of fields meeting the benchmarks.

Each specific report will calculate the data quality over a time period selected by the user. They will be designed to be run monthly, but they can be run for any period. The specific reports to be developed are:

- An overall Continuum data quality summary that can provide the data quality data for the NOFA
- A report that can be run for a single agency selected by the user, monitoring all programs
- A report to be run for a group of programs selected by the user
- A report to be run for a single selected program and that can provide the data quality input for the APR

We also plan to develop other reports for specific program types as needed.

### **Detailed Data Quality Reports**

The purpose of these detailed reports is to list the clients having data quality error so that the users can correct them. Each report displays the data quality errors entered over a time period selected by the user. The heart of the report lists all data quality errors by the unique client ID. We will develop the following reports:

- A report to be run for only one selected program
- A report that can be run for multiple programs but lists its results by program

### **Data Conflicts and Validity Reports**

We will develop a set of data validity reports that report invalid data and conflicts in the data, such as those listed in the Accuracy section above. The purpose of these reports is to highlight

conflicts for investigation and correction if they are errors. All these reports will find conflicts in the data entered over a time period selected by the user. The following reports will be developed:

- A report to be run for one or more programs summarizing the number and type of conflicts
- A detailed report to be run for one or more programs listing the conflicts to be investigated by the unique client ID.

## **Implementation Plan**

Once this data quality plan has been authorized by the Continuum its implementation will begin immediately. The implementation steps are detailed below.

- All agencies contributing to the HMIS must accept this data quality plan within one month after authorization. A representative of each agency must sign the acceptance section of this plan.
- HMIS Administrator develops a basic data quality training to be scheduled for all participating agencies one week after authorization
- Agency heads and HMIS Administrator schedules data quality training for each agency within three weeks after authorization. All employees of the agencies using the HMIS are required to attend these data quality trainings.
- As part of the training all users are required to sign a statement that they have read this data quality plan and that they will follow its standards when using the HMIS
- All agencies complete data quality training within six weeks of authorization
- HMIS Administrator begins developing data quality reports immediately after authorization
- All data quality reports are completed, documented, and available six weeks after authorization
- Monthly data quality monitoring begins with the month beginning six weeks after authorization. The data quality reports are run, distributed, and reviewed within ten working days after the end of the month.
- The HMIS Administrator and HMIS Sub-committee review the improvement in data quality one year after authorization.

## **Continuing Activities**

After plan implementation is complete many data quality activities will continue as ongoing or periodic activities. These activities are:

- Monthly monitoring of data quality by agency and program management and HMIS administration
- Quarterly review of the Continuum's data quality by the HMIS sub-committee

- Annual review of the Continuum's data quality performance and progress by the HMIS sub-committee
- Annual review and revision of the data quality plan if needed by the Continuum led by the HMIS Administrator
- Annual acceptance of the data quality standards by all agencies including a signed acceptance from all HMIS users
- Ongoing initial data quality training and acceptance of standards for new users of the HMIS by agency and program management
- Quarterly trainings for new HMIS users will be offered by the HMIS administration. These can be part of an overall HMIS system training for new users.
- Ongoing development and customization of data quality reports by HMIS administration.



# Standard Operating Procedures (SOP)

For the operation of a Consumer Services Information System

September 2007

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## Introduction

A Homeless Management Information System (HMIS) is a computer software application that can record and store client-level information and services utilized for those persons or families who are homeless or who are at-risk of becoming homeless. An HMIS creates a more coordinated and effective housing services delivery program through out the community while benefiting consumers, service providers and the community as a whole.

Federal, state and local policy makers can use information extracted from the HMIS to better understand homeless issue within a geographic region over time. Participation is mandatory for all homeless service providers, recipients of Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) funded by the U.S. Department of Housing and Urban Development (HUD). Participation by additional agencies who serve homeless individuals and/or families and those at risk of being homeless are strongly encouraged to participate. This may include, but is not limited to agencies that provide: basic needs, income support, legal services, individual and family support services, education, employment, specialized treatment and general medical health. This system is able to provide unduplicated total counts of homeless in an area, analyze use patterns, and evaluate program effectiveness.

There are three main groups of stakeholders who will actively use and benefit from the system. These include consumers, service provider and the community as a whole. Examples of benefits from such a system are listed below.

	<u>System Participants</u>	<u>HMIS Benefits</u>
Residents (Consumers)	Individuals and families who are homeless or who are at risk of being homeless and utilize local services to meet existing needs.	Improves to customer service to individuals and families who are homeless or are at risk of being homeless by; <ul style="list-style-type: none"> <li>• Reducing intake time,</li> <li>• Coordinating of multiple services,</li> <li>• Streamlining referrals and</li> <li>• Assuring customer confidentiality.</li> </ul>
Service Providers	Agencies and key staff people who most often deal directly with the consumers. They represent a wide variety of services.	Improves efficiency and effectiveness by; <ul style="list-style-type: none"> <li>• Reducing the duplication of client intakes and assessments,</li> <li>• Tracking client outcomes and providing history,</li> <li>• Assuring confidentiality,</li> <li>• Providing real time information about client needs and available services,</li> <li>• Generating data reports for local, state and federal requirements and</li> <li>• Providing access to a community-wide database of service providers for referral selection.</li> </ul>
Community	Individuals, agencies and programs who utilize data extracted from the system in order to educate, promote and fund others on homelessness and related issues.	Helps the community define and understand the extent of homelessness and related issues by; <ul style="list-style-type: none"> <li>• Providing better understanding of homeless population,</li> <li>• Helping direct resources towards the areas and services with greatest need,</li> <li>• Allowing for better evaluation of programs and services and</li> <li>• Assisting in meeting local, state, federal reporting and funding requirements.</li> </ul>

In response to concerns over the guarding of private, protected information, HUD has published data and technical standards for the use of an HMIS. Each participating agency, workstation and end user must follow strict adherence to security standards. Consumers must consent to participation in the HMIS, while agencies are not allowed to share information unless they have had client consent. Further more, reports generated from the system do not report information on individuals. Any reported information are aggregate results. The HMIS, which operates and exists in order to better understand and serve the homeless and those at-risk of being homeless, can only succeed if client information is given the utmost importance and is protected in a secure fashion. Local information will not become a part of a national database.

HMIS implementation is funded and supported by HUD. As initial recipients of HUD funding, Catholic Charities of Chemung County, NY staffs the HMIS Administrator. HMIS implementation is recognized as a part of a regional, homeless Continuum of Care (CoC). HUD defines "Continuum of Care" as a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency. It includes action steps to end homelessness and prevent a return to homelessness."

HUD's definition of "community" indicates that the services coordinated under the CoC are done so in terms of geographic region including cities and or counties. Previously, the areas of Elmira / Chemung and Steuben Counties operated as separate CoCs. More recently, these geographic areas, plus the addition of Alleghany County, have merged to create a larger, regional CoC. The regional CoC recognizes that individuals and families who are homeless may desire to meet basic needs and that acquiring these needs may cause these persons to obtain service from one or more agencies or jurisdictions and may be more efficiently served and assisted on a regional level. Therefore, the local name of the HMIS used in the Elmira / Chemung, Steuben and Alleghany Continuum of Care service area is called *Southern Tier Entry to Program Services* or STEPS. This name was selected in order to better represent the goals and day-to-day activities of the initiative, reduce the limitations associated with the government assigned name of "Homeless Management Information System" and to establish geographic identity and focus.

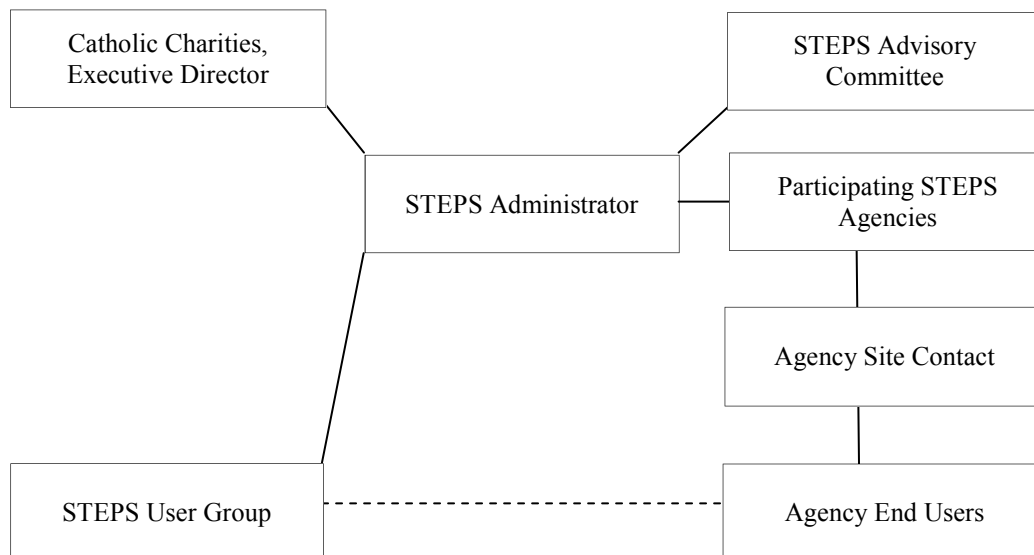
## Roles and Responsibilities

The success of the STEPS initiative largely depends on individuals and organizations who commit to and perform necessary duties and tasks. While some groups or individuals may have final authority in the decision making process, it should be made clear that all opinions, ideas and suggestions are welcome and encouraged by the Advisory Committee from all stakeholders. A list of participating persons and groups are listed and diagramed below (Figure 1).

### Participants

Bowman Internet System, Inc.  
 Catholic Charities of Chemung County, NY  
 STEPS Advisory Committee  
 STEPS Administrator  
 STEPS Participating Agencies  
 STEPS Site Contacts

Figure 1. STEPS Organizational Chart



**PARTICIPANT****ROLES & RESPONSIBILITIES**

3/17/2008

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BOWMAN INTERNET SYSTEMS, Inc.	<p>Responsible for the delivery of the Internet-based client assessments and reporting features.</p> <p><u>Bowman Internet Systems</u> will provide secure, on-going access to its <i>ServicePoint</i> applications via the Internet. In addition, <u>Bowman Internet Systems</u> will provide information about any system modifications and/or upgrades.</p>
CATHOLIC CHARITIES Of CHEMUNG COUNTY, NY	<p>Responsible for the administration and staffing of the STEPS Administrator. Because it has secured the initial funding for the STEPS system, its Board of Directors will have final say in administrative and staffing issues.</p> <p>Catholic Charities will also provide organizational oversight for STEPS through its participation in the STEPS Advisory Committee.</p>
STEPS ADVISORY COMMITTEE	<p>Responsible for developing and reviewing all system-wide policies and procedures for STEPS.</p> <p>In selecting participants for this committee, STEPS will attempt to secure and maintain representatives from:</p> <ul style="list-style-type: none"><li>• Homeless housing and service type,</li><li>• HUD-identified homeless subpopulation,</li><li>• Continuum of Care municipality and</li><li>• Current and formerly homeless individuals.</li></ul> <p>The STEPS Advisory Committee will provide input on an on-going basis for the local STEPS initiative. The Committee will share its recommendations on key issues such as, but not limited to:</p> <ul style="list-style-type: none"><li>• Determining and establishing guiding principle for STEPS,</li><li>• Selecting data elements to be collected by participating agencies,</li><li>• Defining guidelines for the release of aggregated STEPS data,</li><li>• Evaluating compliance with HUD data and technical standards,</li><li>• Reviewing STEPS performance of participating agencies, particularly in the area of adherence to established protocols and procedures and</li><li>• Addressing issues that arise from the use of STEPS including but not limited to client grievances and policy adjustments.</li></ul>

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STEPS  
ADMINISTRATOR

The STEPS Administrator is responsible for implementing and coordinating the local HMIS. The Administrator is the primary contact for STEPS and the STEPS Site Contacts. Responsibilities include:

- Orienting prospective STEPS participants to the system by demonstrating STEPS functions and features;
- Creating and monitoring the STEPS implementation plan;
- Maintaining a list of agency contacts and STEPS participants;
- Providing oversight of all contractual agreements.
- Assessing agencies readiness for STEPS;
- Providing STEPS trainings;
- Creating and updating any needed training manuals.
- Authorizing access to the STEPS system;
- Developing and implementing assessment tools not already in place;
- Providing basic technical assistance to participating agencies;
- Documenting database and policy/procedure changes;
- Developing and evaluating performance measures;
- Updating “Standard Operating Procedure (SOP) manual”;
- Auditing STEPS usage system-wide;
- Developing reports and queries for Continuum of Care;
- Presenting research findings to community stakeholders;
- Coordinating and participating in regular user-group meetings to address on-going system enhancements, facilitate information sharing and identify best practices;
- Communicating with participating agencies/CoC and community as a whole.

**The STEPS Administrator is NOT responsible for providing trouble shooting assistance for agency hardware, software, internet connectivity issues or providing remedial computer training to system users.**

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**PARTICIPATING  
STEPS  
AGENCIES**

Participating STEPS Agencies are responsible for overseeing the entry of client data into the system as well as identifying needs and concerns regarding STEPS to their Site Contact.

User are responsible for:

- Knowing the confidential nature of the data and taking appropriate measures to prevent any unauthorized disclosure of client information.
  - Complying with all local STEPS policies and procedures.
  - Reporting security violations to their STEPS site contact.
  - Any user within the Participating Agency are also responsible for their own actions and any actions undertaken with their usernames and password.
- 

**STEPS SITE  
CONTACTS**

Each Agency participating in STEPS must designate a primary person to serve as the Participating Agency's contact for the project and will facilitate access to the STEPS at an organizational level.

This person, known as the Site Contact, will help increase effective communication, both between and within agencies.

Each STEPS Site Contact will be responsible for:

- Participating in the STEPS readiness assessment.
  - Identifying STEPS users and facilitate access to training.
  - Granting STEPS access only to authorized staff members that have received training and demonstrated proficiency in application use and understand policies and procedures.
  - Monitoring staff compliance with standards of client confidentiality and ethical data collection, entry cleaning, and retrieval and enforcing established misuse policy.
  - Enforcing business controls and practices including detection and reporting of violations.
  - Providing on site support for the generation of agency reports and managing user licenses.
  - Ensuring stability in the agency Internet connection either directly or in communication with a technician.
  - Notifying users about interruptions in services.
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**SYSTEM  
END USERS**

System End Users are the staff, paid or voluntary, from participating agencies that will be entering client data into the system as well as identifying needs and concerns regarding STEPS to their Site Contact.

System End Users will be responsible for:

- Being aware of the confidential nature of data and taking appropriate measures to prevent any unauthorized disclosures of client information;
- Complying with all local STEPS policies and procedures and
- Reporting security violations to their STEPS Site Contact.

Agency End-users are also responsible for their own actions or any actions undertaken with their username and password.

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## Policies and Procedures: Section 1

### Participation

#### Policy Summary - 1.0

In conjunction with the STEPS Administrator, the STEPS Advisory Committee will establish requirements for participation in the local STEPS. Participation is mandatory for all HUD funded homeless service providers, recipients of Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA). Currently, participation is voluntary for other agencies within the Continuum of Care. Agencies that wish to participate in STEPS, either mandatory or voluntary, must implement and adhere to a set of policies and procedures set forth in this Standard Operating Procedures (SOP).

<u>Policy #</u>	<u>Topic</u>
1.01	Participants
1.02	Participation requirements
1.03	Voluntary termination
1.04	Involuntary termination
1.05	Program termination
1.06	Software provider termination

#### Related

#### Documents:

Appendix A - *Readiness Assessment*  
 Appendix B - *Agency Participation Agreement*  
 Appendix C - *User Policy, Responsibilities and Code of Ethics*

<b>1.01</b> Participants	Per HUD requirements, all recognized Continuums of Care (CoC) must have an active and operating Homeless Management Information System (HMIS) within their geographic coverage area. HUD-funded agencies such as homeless service providers, those receiving Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) as well as non-HUD funded agencies are welcome and strongly encouraged to participate.
<b>1.02</b> Participation requirements	<p>Participation in STEPS is open to all agencies within the CoC whether or not they receive HUD funding. In order to gain access to the system, each agency needs complete the following <i>Steps to Participation</i>:</p> <ol style="list-style-type: none"> <li>1) <u>Readiness Assessment</u> - Upon notifying the STEP administrator, interested agencies will receive a copy of the Standard Operating Procedures (SOP) for their review. A <i>Readiness Assessment</i> / site visit will be scheduled with the Agency's Executive Director, staff and the STEPS Administrator to review current record keeping needs and methods, client intake procedure, security / confidentiality issues, equipment and internet connection check and overall agency readiness (Appendix A).</li> <li>2) <u>Agency Agreements</u>. - Upon successful completion of the readiness assessment, participating agencies will be asked to review and sign a <i>Agency Participation Agreement</i> (Appendix B). This document outlines the responsibilities, obligations and project expectations for participating agencies.</li> <li>3) <u>Site Contacts</u> - Each participating agency will establish a Site Contact. The Site Contact will serve as the Participating Agency's contact for the project and will facilitate access to STEPS at an organizational level. Having a Site Contact will also increase the effectiveness of communication both between and within agencies.</li> <li>4) <u>User Training</u> - The Site Contact will set up training for their agency with the STEPS Administrator. All Users must demonstrate mastery of training information and complete post-training evaluations to be submitted to the STEPS Administrator. In addition, agency staff who will be end users of the system must complete the <i>End-user Rules, Responsibilities and Code of Ethics Agreements</i> (Appendix C).</li> <li>5) <u>System Access</u> - Following a successful completion of the training, the Site Contact and the STEPS Administrator will schedule a supervised, initial data entry period, no later than two weeks after the training. During this early data entry period the STEPS Administrator will assign user IDs and initial passwords, assist with system set up, monitor data entry techniques and be available for questions. After which time Agency questions should be directed towards the Site Contact, then the STEPS Administrator via phone, email or at user group meetings.</li> </ol>
<b>1.03</b> Voluntary termination	A participating agency may discontinue use of the system at any time. To discontinue participation in STEPS, an agency must submit written notice to the STEPS Administrator. Upon receipt of this written notice, all licenses assigned to that agency will be discontinued by 5pm on the last day of that month, unless an alternative termination date is agreed upon by the Agency and the STEPS Administrator.
<b>1.04</b> Involuntary termination	Security breaches are the primary reason for involuntary termination, of either a user or an agency. Permanent involuntary termination would follow a series warnings and corrective measures, including temporary suspension until the matter is resolved ( <i>See Sections 3.11-3.14</i> ). In the event the STEPS Advisory Committee recommends termination of STEPS access, the Committee will submit a written notice to the agency's Executive Director identifying a termination date. On that termination date, all licenses will be discontinued at 5pm, unless an effective date is otherwise established. The STEPS Administrator obtains the authority to temporarily shut off any one's access to the system if an immediate threat to the system exists.
<b>1.05</b> Program termination	In the event that STEPS ceases to exist, participating Agencies and their End-users will be notified and provided reasonable time to access and save Client data on those served by the agency, as well as statistical and frequency data from the entire system. Thereafter, the information collected by the centralized server will be purged or appropriately stored.

## Policies and Procedures: Section 2

### Hardware Requirements and System Availability / Support

#### Policy Summary - 2.0

A number of requirements have been set in place in order to assure the successful operation of STEPS, which is available to users 24 hour a days / 7 days a week. Purchase and maintenance of computer equipment will be the responsibility of participating agencies. Support for STEPS related issues is available during regular business hours, on a first come first serve basis and as time/scheduling permits.

<u>Policy #</u>	<u>Topic</u>
2.01	Hardware
2.02	Workstation safeguards
2.03	System availability
2.04	System support

The STEPS Advisory Committee strongly encourages participating agencies to follow Bowman Internet Systems, hardware, software and connectivity guidelines for use of *ServicePoint*.

This includes, but is not limited to:

**2.01**  
Hardware

- Computer: PC with a 2 Gigahertz or higher processor,
- Most recent version of Microsoft Internet Explorer or Firefox,
- 40GB Hard Drive and 512 MB RAM,
- Microsoft Windows 2000 or XP,
- 128-bit cipher encryption on Browser and
- Minimum Connectivity 56 Kbps to Optimal Connectivity 128 Kbps– 1.5 mps.

Participating Agencies are responsible for the purchase, maintenance and disposal of on-site computer equipment to all existing and new equipment needed for the utilization of STEPS.

**2.02**  
Workstation  
safeguards

All participating agencies must keep active, up-to-date safeguards against internet threats operating within their workstation(s) for the extent of their participation in STEPS. This includes: anti-virus software, Spam blockers, Spyware, operating system security patches and installation of firewalls. Participants may refer to OnGuardOnline.gov for more information or ask their own IT staff for assistance.

**2.03**  
System availability

STEPS is available 24 hours a day, 7 days a week year round with the exception of scheduled system back-ups and routine maintenance.

- In the event of planned downtime, the STEPS administrator will inform Site Contacts via electronic mail, phone and/or at User Group meetings.
- In the event of unscheduled downtime, STEPS staff will contact the Agency Site-Contact via electronic mail and/or phone to inform them of the cause and possible duration of the service interruption.

**2.04**  
System Support

The STEPS Administrator will provide system support by phone, electronic mail, computer shadowing and/or in-person consultations regarding use of the system. The STEPS Site Contact should act as the first level of contact when a system problem arises and should determine if the problem requires immediate rectification.

If an STEPS Site Contact cannot resolve the problem, they should contact the STEPS Administrator by either phone or electronic mail and leave a contact number. The STEPS Administrator will respond as soon as possible. and arrange for needed assistance.

If the problem is urgent and the STEPS Administrator is not immediately available, Site Contacts may contact the STEPS Administrator back-up person via phone or electronic mail.

It is the goal of the STEPS staff to respond to all participating agency needs within one business day of initial contact.

**The STEPS Administrator and their back-up person are NOT responsible for providing trouble shooting assistance for agency hardware, software, internet connectivity issues or providing remedial computer training to system users.**

## Policies and Procedures: Section 3

### Security

#### Policy Summary - 3.0

The *HMIS Data and Technical Standards, Final Notice* by the U.S. Dept. of Housing and Urban Development (HUD, 2004) sets forth baseline standards for communities implementing an HMIS like STEPS. It provides baseline standards and technical controls to protect client data throughout the use of the system. This includes multi-faceted approach to security standards. Participating agencies must establish and implement their own security measures regarding STEPS. Each user is responsible for work done under their User ID and Password. Access control violations must be monitored, reported and resolved.

<u>Policy #</u>	<u>Topic</u>
3.01	Security oversight
3.02	Bowman Internet Systems, Inc. security
3.03	Catholic Charities security
3.04	Participating Agency security
3.05	System access
3.06	User access
3.07	Limited viewing
3.08	Access levels
3.09	Client report / case file security
3.10	User suspension, termination or extended leave
3.11	Security incident definitions
3.12	Security incident reporting
3.13	Security incident review
3.14	Security incident sanctions
3.15	Security monitoring

#### Related

<u>Documents:</u>	Appendix D - <i>Security Incident Report</i> Appendix E - <i>Security Incident Review</i>
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**POLICY #****SECURITY**


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<b>3.01</b> Security oversight	System security and integrity shall be reviewed on a regular basis by the STEPS Advisory Committee, the STEPS Administrator, Executive Directors of participating agencies and Site Contacts.
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Bowman Internet Systems, Inc. (BIS) is the provider of *ServicePoint*, the web-based application that will be used with STEPS. The STEPS Advisory Committee and the STEPS Administrator will review their security measures on a regular basis. BIS, the STEPS Advisory Committee and the STEPS Administrator will be in regular communication to address any security issues or concerns.

BIS security strategies include:

Physical Security: Bowman Internet Systems (BIS) hosts the central server for the STEPS server. The BIS data center is located at its headquarters in Shreveport, Louisiana. Located in a 20-story office complex, 24-hour security is provided. After normal business hours, card access is required and monitored. In addition, separate, limited key access is required for entry into the main office and into the server room.

Access to Server: No one will have direct access to the STEPS system through any means other than *ServicePoint* software unless explicitly given permission by the STEPS Administrator during a process of maintenance, software upgrade, or conversion. BIS will monitor access to the STEPS server and employ security methods to prevent unauthorized database access. Access to client data will be tightly controlled using security technology and restrictive access policies. Only individuals authorized to view or edit individual client data will have access to that data.

Firewall Protection: BIS secures the perimeter of its network using technology from firewall vendors. The firewall provides real-time, in-line monitoring, interception, and response to network misuse through broad support for the most common attach intrusion detection signatures. Appropriate action can be taken on packets and traffic flows that violate a security policy or represent malicious network activity. Company system administrators monitor firewall logs to determine unusual patterns and possible system vulnerabilities.

SSL Data Encryption: BIS utilizes commercial-grade, 128-bit SSL encryption for data traveling over the Internet to the BIS network. The SSL (Secure Socket Layers) Handshake Protocol negotiates encryption keys and authenticates server before data is exchanged by the higher-level application. The SSL protocol maintains the security and integrity of the transmission channel by using encryption, authentication, and message authentication codes.

As a user enters *ServicePoint*, they access data with 128-bit encryption from their browser and 1024-bit RSA public key from the *ServicePoint* servers. Distinguished by a lock icon in the corner of their browser, users are ensured that their data is secure in transit.

User Authentication: *ServicePoint* can only be accessed with a valid username and password combination, which is encrypted via SSL for Internet transmission to prevent theft. If a user enters an invalid password four consecutive times, *ServicePoint* automatically marks them inactive. For added security, the session key is automatically scrambled and re-established in the background at regular intervals.

Application Security: In addition to restricting access to only authorized users, *ServicePoint* utilizes a system of multiple access levels. These levels automatically detect the user access level and controls access to appropriate data.

Database Security: All database access is controlled at the operating system and database connection levels for additional security. Access to production databases is limited to a minimal number of points; as with production servers, production databases do not share a master password database.

**3.02**  
Bowman Internet  
Systems, Inc. security

Catholic Charities of Chemung County, NY will staff and house the STEPS Administrator. The STEPS Advisory Committee and the Catholic Charities IT department will review their security measures on a regular basis. The STEPS Advisory Committee, Catholic Charities and the STEPS Administrator will be in regular communication to address any security issues or concerns.

Catholic Charities' security strategies include:

Physical Security: Catholic Charities of Chemung County, NY is housed at 2215 E. Church St., Elmira, NY 14901. Visitors to the building are required to sign in at the front desk. User ID and Passwords are required to access individual workstations. Any raw data or system information is stored in locked cabinets to maintain confidentiality and security. The office of the STEPS Administrator is locked with limited key access.

System Administrator Access: Access to all computing, data communications, and data resources will be controlled. Access is controlled through user identification and authentication. The STEPS Administrator is responsible and accountable for the work done under personal identifiers. Access control violations must be monitored, reported and resolved.

System Access Monitoring: The STEPS system automatically tracks and records access to every client record by use, date, and time of access. The STEPS administrator will monitor access to system software by regularly reviewing user access privileges and removing identification codes and passwords when users no longer require access. In addition, the STEPS Administrator, in conjunction with site contacts, will audit all unauthorized accesses and attempts to access information. Audit records shall be kept at least six months according to industry standards.

User Authentication: STEPS will only be accessed with a valid username and password combination, which is encrypted via SSL for Internet transmission to prevent theft. If a User enters an invalid password four consecutive times, STEPS automatically marks them inactive. For added security, the session key is automatically scrambled and re-established in the background at regular intervals.

Administration and System-wide Data: The STEPS Administrator will have full access to system. The STEPS Administrator can add, edit, and delete users, agencies, and programs and reset passwords. Access to system-wide data will be granted based on need to access data and with approval from the STEPS Advisory Committee.

Data Usage and Protection: See Section 5, Data Issues.

Data Security: Wherever possible, all database access is controlled at the operating system- and database-connection level for additional security. Only the STEPS Administrator will have access to changing database information at the server level. When this is done, an appropriate written summary of the information changed will be logged by the STEPS Administrator. The STEPS Administrator will produce a monthly report to be overseen and audited by the STEPS Advisory Committee.

### 3.03

#### Catholic Charities security

### Participating STEPS Agencies, Security

Participating agencies using STEPS shall establish and implement both physical and technology security protocols. These include, but are not limited to:

Physical Security: Agencies must develop rules to address physical access to workstations. This includes but is not limited to: establishing a private intake area, orienting computer monitors displaying client data to minimize viewing by unauthorized persons, using ID and passwords for work station log-in, locking screen savers, secure filing systems and offices.

User Authentication: STEPS will only be accessed with a valid username and password combination, which is encrypted via SSL for Internet transmission to prevent theft. If a user enters an invalid password four consecutive times, STEPS automatically marks them inactive and requires that they contact their STEPS Site Contact for reactivation. If the Site Contact is unavailable, the staff member should contact the STEPS Administrator and will be asked a security question to confirm their identity. For added security, the session key is automatically scrambled and re-established in the background at regular intervals.

### 3.04

#### Participating agency security

Access to Data - User Access: Users will only be able to view the data entered by users of their own agency or shared client records. STEPS has security measures in place which prohibit agencies from viewing each other's data. End-User are not to view other client data unless it is relevant to their job duties and responsibilities.

Access to Data - Raw Data: Users who have been granted access to the STEPS Report Writer tool have the ability to download and save client level data onto their local computer. Once this information has been downloaded from STEPS in raw format to an agency's computer, these data then become the responsibility of the agency. Partner Agencies must develop protocols regarding the handling of data downloaded from Report Writer, record disclosure, and storage.

Access to Data - Policies Restricting Access to Data: Each participating STEPS agency must establish internal access to data protocols. These policies should include who has access, for what purpose, inter-agency data sharing and how they can transmit this information. Issues to address include storage, transmission, and disposal of data.

Client Paper Record Protection: Partner agencies must establish procedures to handle client paper records. Issues to be addressed include:

- Who has access to client paper records and for what purpose;
- When staff can access those records (i.e. only for clients whom they work with or for data entry purposes);
- How and where client paper records are stored;
- Where and how long client paper records are stored and when and how they are disposed of; and
- When, how and to whom information contained in client paper records is disclosed.

Data Usage and Protection: See Section 5, Data Issues

**3.04**  
Participating agency  
Security, con't.

**3.05**  
System access

Access to the system is controlled through user identification and authentication. In order to ensure that only authorized personnel are able to enter, modify or read system data, only authorized users shall be granted a unique User ID and Password by the STEPS Administrator.

Users are responsible and accountable for work done under their personal identifiers. Access control violations must be monitored, reported and resolved.

**3.06**  
User access

Passwords are automatically generated by the STEPS system when a new user is created. The STEPS Administrator will communicate the initial system-generated password to each agency user.

Each user will be required to change the password the first time they log onto STEPS. The password is alphanumeric and case sensitive. It must have between 8 and 16 characters and contain at least 2 numbers. Passwords are the individual's responsibility and users cannot share passwords under any circumstances. Passwords should not be easily guessed or found in any dictionary. They should be securely stored and inaccessible to other persons. Passwords expire every 45 days.

**3.07**  
Limited viewing

Agencies are strictly prohibited from viewing each other's client data unless specific sharing agreements have been negotiated. Clients must also grant permission to share information with a specified agency. Users will only be able to view the data entered by users of their own agency unless agreements are in place.



In addition to User IDs and passwords, the STEPS Administrator, with input from the Agency's Executive Director and/or Site Contact, will assign appropriate levels of access to each user of STEPS. Access to STEPS will be controlled based on need. Need exists for those administrators, staff, volunteers or designated personnel who work directly with (or supervise staff who work directly with) clients or have data entry responsibilities. User access levels will be directly related to the user's job responsibilities and approved need for access to STEPS.

Following is a list of "Access Levels" available within the STEPS system. It is important to keep in mind that agencies using STEPS may have some or all of the Access Levels filled. Persons within each agency may assume multiple roles due to the size of the agency.

Resource Specialist I - Under this access level, a user may access only the *ResourcePoint* module. Users may search the database of area agencies and programs and view the agency or program detail screens. Access to client or service records and other modules and screens is not given. A resource specialist cannot add, modify or delete data.

Resource Specialist II - In addition to the access listed above, a Resource Specialist II is an agency-level "Information & Referral Specialist" who may update their own agency and program information.

Resource Specialist III - In addition to the access listed above, a Resource Specialist III may edit the system-wide news feature of STEPS.

Volunteer - Under this access level, a user may access *ResourcePoint*, and have limited access to *ClientPoint*, and to service records.

A volunteer may view or edit basic demographic information about clients (the profile screen), but is restricted from all other screens in *ClientPoint*.

A volunteer may also enter new clients, make referrals, or check-in/out a client from a shelter/facility. A volunteer does not have access to the "Services Provided" tab in STEPS. This access level is designed to allow a volunteer to perform basic intake steps with a new client and then refer the client to an agency staff or case manager.

Agency Staff - Under this access level, a user may access *ResourcePoint*, and have full access to service records, but only limited access to *ClientPoint*. Agency staff may access most functions in *ServicePoint*, however, they may only access basic demographic data on clients (profile screen). All other screens are restricted including Reports. Agency Staff can add news items to the *News-Flash* feature of *ServicePoint*.

Case Manager I - Under this access level, a user may access all STEPS screens and modules except "Administration." A Case Manager I may access all screens within *ClientPoint* except, for confidentiality reasons, the medical screen. They also may access *Reports*.

Case Manager II - In addition to the access listed above, a Case Manager II may access all screens within *ClientPoint*, including the medical screen and *Reports*.

Agency Administrator - Under this access level, a user may access all *ServicePoint* screens and modules. This level may add/remove users and edit agency and program data for his/her agency.

Executive Director - Same access rights as Agency Administrator, but ranked above Agency Administrator.

System Operator - Under this access level, a user may just access "Administration." The system operator can setup new agencies, add new users, reset passwords, and access other system-level options. The system operator may order additional user licenses and modify the allocation of licenses. They maintain the system, but may not access any client or service records.

System Administrator I - Same access rights to client information as Agency Administrator, but excludes shadow mode. Full access to administrative functions.

System Administrator II - No restrictions. Full access to STEPS.

### 3.08 Access levels

Certain STEPS Users will have access to agency-level STEPS data in the form of reports and client case files. Viewing this information is based on a User's Access Level. Reasonable care should be taken when reviewing STEPS materials to ensure information is secure.

**3.09**  
Client report /  
case file security

- Media and documents containing client-identified data should not be shared with any agency other than the owner of the data (and their branch offices) for any reason. *An Inter-Agency Data Sharing Agreement* and **signed Release of Information (ROI)** from the Client must be secured before the agency shares information with another member of STEPS. See Section 5, Data Issues.
- Printed versions of confidential data should not be copied or left unattended and open to unauthorized access. STEPS information in hardcopy format should be stored or disposed of properly.
- Authorized employees, using methods deemed appropriate by the participating agency, may transport STEPS data which meets approved security standards. However, a record of the transport – including information about the nature and type of information - must be maintained as well as a notification of information return.
- All client records containing identifying information that are stored within the Participating Agency's local computers are the responsibility of the participating agency.
- Media containing STEPS data that is released and/or disposed of by the participating agency should first be processed to destroy any data residing on that media. Degaussing, shredding and overwriting are acceptable methods of destroying data.

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**3.10**  
User suspension,  
termination or extended  
leave

Should any User be suspended or terminated from their current position, the Agency's Site Contact should notify the STEPS Administrator immediately (within 24 hours) for their termination from the system. If a staff person is to go on leave for a period of longer than 45 days, their password should be ineffective within 5 business days of the start of their leave. The STEPS Administrator is responsible for removing Users from the system. Both the STEPS Administrator and Site Contacts should review the agency access lists and signed agreements on a quarterly basis to ensure that records are up-to-date. The STEPS Site Contact must provide information about changes in personnel accessing the system to the STEPS Administrator.

A security incident is defined as any occurrence that adversely affects or has the potential to adversely affect the integrity and/or confidentiality of the information contained within STEPS or its operation. Examples include, but are not limited to:

Data or file extraction - Unauthorized, electronic removal of information from the STEPS System.

Introduction of Malicious Code or Virus - Intentional or unintentional, unauthorized introduction of malicious code or virus onto STEPS or agency computer equipment.

Modification of agency information - Intentional or unintentional, unauthorized modification of agency information.

### 3.11

#### Security incident definitions

Attempts to modify passwords or access rights - Intentional or unintentional attempt to modify STEPS user passwords or access rights.

Compromised or lost password - A compromise in a password occurs when staff believes that an individual other than the one to which the password is assigned becomes aware of the password. Sharing a password, except to the STEPS Administrator, is considered a compromise.

Dissemination of protected client information from STEPS system in electronic or paper form - Intentional or unintentional, unauthorized dissemination of client information in an electronic format. This includes sending email or a facsimile to an unintended recipient or sending of email in an unprotected manner (i.e., through an unsecured mechanism).

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Each Site Contact will be responsible for monitoring all user access within their agency. All security incidents must immediately be reported to the STEPS Administrator.

The STEPS Administrator will provide direction as needed to the individual(s) responding to the security incident and to evaluate the necessity of mobilizing additional resources. The STEPS Administrator is also responsible for ensuring that immediate action is taken to protect the security and integrity of the STEPS System and client data.

In addition to verbally reporting the incident to the STEPS Administrator, the site contact must complete a *Security Incident Report* as soon as possible and forward it to the STEPS Administrator (Appendix D). The purpose of the report is to provide subsequent readers with an accurate image of the security incident through written documentation.

### 3.12

#### Security incident reporting

The report should be written in a clear, concise, and specific manner and should focus on the facts and events that occurred immediately prior to the incident, the incident itself, and the events that occurred immediately after the incident.

In addition to the above items, the report should include:

- Parties involved including each staff member's full name;
- A summary of each party's actions;
- Time and location of the incident; and
- Observations of any environmental characteristics that may have contributed to the incident.

The STEPS Administrator will take responsibility for reporting the incident to the STEPS Advisory Committee, and when appropriate, law enforcement officials.

Security incidents will be reviewed at the next regularly scheduled meeting of the STEPS Advisory Committee to ascertain if the incident could have been avoided or the impact minimized. Each incident will be scrutinized to determine the appropriateness of staff actions and protocols. Recommendations about the need for additional resources, staff training, security modifications, and protocols will also be noted.

More specifically, the STEPS Advisory Committee will:

- Evaluate the timeliness, thoroughness, and appropriateness of the staff member's response to the security incident;
- Ascertain if the security incident could have been prevented;
- Recommend corrective actions, if warranted;
- Evaluate security incidents for trends and patterns;
- Monitor the agency's compliance with the security policies and protocols;
- Monitor the implementation of any preventative or corrective action; and
- Recommend changes to STEPS policies, procedures and practices, and working agreements that will reduce the likelihood that similar security incidents would occur.

**3.13**  
Security incident review

An aggregate report of security incidents will be compiled by the STEPS Administrator on a quarterly basis for review by the STEPS Advisory Committee (Appendix E). At minimum, these incidents will be analyzed by type of incident, location, employee/organizational involvement, time and date. Records of security incidents will be maintained by the STEPS Administrator.

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In the event of a security violation by an individual user, the necessary sanctions will be handled and imposed by the User Agency's Executive Director with input from the STEPS Advisory Committee. In the event of security violations by an agency, the necessary sanctions will be handled and recommended by the STEPS Advisory Committee.

**3.14**  
Security incident sanctions

In the event of either an individual or agency security violation, the STEPS Administrator may temporarily terminate access to the system while the issue(s) are resolved. Any agency that is found to have consistently and/or flagrantly violated security protocols may have their access privileges suspended or revoked. The STEPS Administrator will only terminate access if advised to do so by the STEPS Advisory Committee.

Recommended sanctions may include but are not limited to: a formal letter of reprimand, suspension of system privileges, revocation of system privileges, termination of employment and criminal prosecution.

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**3.15**  
Security monitoring

The STEPS Administrator and Site contacts will be responsible for advising staff about STEPS security protocols as per the Agency Partner Agreement and this Standard Operating Procedure (SOP). Following a security incident, the STEPS Administrator will also provide follow-up training to the organization staff, especially when new protocols have been recommended.

The STEPS Administrator, Site contacts and STEPS Advisory Committee will be responsible for providing on-going monitoring of agency compliance with STEPS Policies and Procedures. This monitoring will include review of security policy and procedures and will occur on an annual basis.

## Policies and Procedures: Section 4

### Confidentiality

#### Policy Summary - 4.0

This section describes the baseline standards that are required by the Homeless Management Information System (HMIS), Data and Technical Standards / Final Notice (Federal Register/ Volume 69, Number 146, July 30, 2004). Any organization that records, uses or processes Protected Personal Information (PPI) of those clients entered into STEPS must at the minimum must adhere to these standards. Participating agencies may wish to establish and implement additional confidentiality protocols. Participating agencies that must adhere to the Health Insurance Portability and Accountability Act (HIPAA) can and should participate in STEPS. However, those agencies may need to incorporate additional privacy and security measures when handling Client information.

Clients must give written consent before any of their PPI can be shared with another participating agency. *No client may be denied services of any kind if they decline to have the agency use or share their information through STEPS.* Clients may revoke their authorization for the agency to share information at any time. Agencies with questions regarding HIPAA and HMIS should review this document, the Data and Technical Standards / Final Notice (available at [www.hmis.info/ClassicAsp/documents/ HUD%20Data%20and%20Technical%20Standards.pdf](http://www.hmis.info/ClassicAsp/documents/HUD%20Data%20and%20Technical%20Standards.pdf)) and/or contact the STEPS Administrator.

<u>Policy #</u>	<u>Topic</u>
4.01	Confidentiality Commitment
4.02	Consumer Notice
4.03	HIPAA and HMIS
4.04	Privacy Protection notice
4.05	Oral Informed Consent
4.06	Commitment not to solicit

#### Related

Documents: Appendix F - *Consumer Notice*  
Appendix G - *Privacy Protection Policy*

**4.01**  
Confidentiality  
commitment

Participating agencies shall adhere to all relevant federal, state and local laws and regulations as well as security policies regarding the protection of confidential information.

The STEPS Advisory Committee and the STEPS Administrator will maintain a list of requirements that are expected to be enforced at participating agencies. Failure to do so may result in the loss of access to STEPS.

**A CLIENT MAY NOT BE REFUESED SERVICES OF ANY KIND IF THEY DECLINE TO HAVE THE AGENCY SHARE THEIR INFORMATION THROUGH STEPS.**

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**4.02**  
Consumer Notice

All Partner Agencies must post a *Consumer Notice* (Appendix F) at the point of data collection to inform clients of their intent to collect and enter data into STEPS. A copy of this notice must be made available to clients upon request.

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**4.03**  
HIPAA & HMIS

Participating agencies that must adhere to the Health Insurance Portability and Accountability Act (HIPAA) should adhere and comply with HIPAA privacy standards.

For all other agencies that provide homeless assistance and participating in this HMIS, which is NOT a clearing house as defined by HIPAA, they must adhere to HUD established privacy standards, as discussed in this Standard Operating Procedures manual, regarding the recording, use and processing of Protected Personal Information (PPI).

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**4.04**  
Privacy Protection  
Policy

The STEPS Administrator must publish a privacy notice describing the STEPS policies and practices for recording, processing and use of Personal Protected Information (PPI) (Appendix G). Participating Agencies must provide a copy of the STEPS Privacy Protection Policy notice to any individual upon request.

The Privacy Protection policies may be amended at any time. Amendments may affect information obtained prior to the date of change. The STEPS Administrator will maintain a record of any Privacy Protection Policy amendments.

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Upon entry into a service within the Continuum of Care, all clients will be provided an oral explanation that their information will be entered into a computerized record-keeping system with client consent. The partner agency will provide an explanation of both the STEPS Initiative and the terms of consent. The agency is responsible for ensuring that this procedure takes place at the initial contact for every client. In instances where the client does not speak English or has difficulty understanding, it is expected that the Agency will make the appropriate accommodations such as a document written in their Primary Language or providing an interpreter.

The Agency must share the following information:

What STEPS is: An Internet-based information system that homeless services agencies use to capture information about the persons they serve.

Benefits for Clients: Case manager can tell clients about services available on-site or by referral and Case manager/client can use information to assist in obtaining resources.

Why the Agency uses it: To understand their client's needs; To help the programs plan to have appropriate resources for their clients; and To inform public policy in an attempt to end homelessness.

Security: Only staff who work directly with clients or who have administrative responsibilities can look at, enter, or edit client records.

Privacy Protection: Information that is transferred over the web is through a secure connection; No client information will be released to another agency without written consent; Client has the right to not answer a question, unless admission to the program requires it; and Client has the right to know who has added to, deleted, or edited their record.

Following initial intake (preferably during the first visit with a case manager), Agency staff member will inquire if client is willing to have his or her information shared with other providers which are part of STEPS.

**Clients who choose not to authorize sharing of information cannot be denied services for which they would otherwise be eligible.**

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#### 4.06

Commitment not to solicit

Participating agencies must not solicit or input information from clients unless it is clearly in the client's best interest and is essential to provide services or to conduct research/program evaluation.

## Policies and Procedures: Section 5

### Data Issues

#### Policy Summary - 5.0

Following the completion of the *Steps to Participation* listed in Section 1, a partner agency may begin using STEPS. Agencies will collect and enter the minimum amount of data needed to meet required HUD and program-specific data elements as determined by the STEPS Advisory Committee. Both paper and electronic copies of client information should be protected at all times. All partner agencies take full responsibility of ownership and confidentiality protections of any and all data that is collected at their agency and/or downloaded from STEPS. Participating agencies must implement data quality procedures to insure their data and the STEPS data, as a whole, is of high quality.

<u>Policy #</u>	<u>Topic</u>
5.01	Data elements
5.02	Data ownership
5.03	Data entry
5.04	Data user group
5.05	Data controls
5.06	Data types
5.07	Data usage
5.08	Data protection
5.09	Inter-agency sharing
5.10	Client revocation of inter-agency data sharing
5.11	Agency reports
5.12	General reports
5.13	Data monitoring

#### Related

Documents: Appendix H - *Release of Information (ROI)*  
 Appendix I - *Refusal to Release information*  
 Appendix J - *Inter-Agency Data Sharing Agreement*  
 Appendix K - *Revocation of Client Consent*



Agencies participating in STEPS agree to collect HUD/HMIS required universal data elements derived from the HMIS, Data and Technical Standards / Final Notice, as well as data elements recommend by the STEPS Advisory Committee. Collecting universal data elements will make possible the unduplicated estimates of homeless people accessing services from service providers, provide basic demographic characteristics of homeless persons and those at risk of being homeless and patterns of use such as information on shelter stays and homelessness episodes over time.

Mandatory local data elements, as yet to be determined by the STEPS Advisory Committee, will help the CoC to address additional, more local issues.

In order to collect this information, participating agencies are responsible for ensuring that all clients are asked a mandatory set of questions. The STEPS System set up allows for mandatory data elements will be displayed in RED text or will otherwise indicate that the field is required. Partner agencies agree to enter this information into STEPS.

#### HMIS universal data elements:

- Name
- Social Security Number
- Date of birth
- Ethnicity and Race
- Gender
- Veteran Status
- Disabling Condition
- Residence prior to program entry
- Zip Code of last permanent address
- Program entry date
- Program exit date
- Unique ID number
- Program ID number
- Household ID number

#### **5.01** Data elements

There are additional data elements, which are required for HUD's Annual Progress Reports and may become mandatory for STEPS users.

#### APR required data elements:

- Income and sources
- Non-cash benefits
- Physical disability
- HIV/AIDS
- Destination
- Mental health
- Substance abuse
- Domestic violence
- Services received
- Reason(s) for leaving

Data elements that HUD may require within the APRs in the future include:

- Employment
- Education
- General Health Status
- Pregnancy status
- Veteran's information
- Children's education

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**5.02**  
Data ownership

Participating agencies are the owners of all client data collected and stored within the system. This data is protected and secured by the policies, technology and security protocols held in place. All partner agencies take full responsibility of ownership and confidentiality protection of any and all data that is collected at their agency and/or downloaded from STEPS.

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**5.03**  
Data entry

It is expected that participating agencies will provide the following levels of accuracy and timeliness:

- All names and Social Security Numbers will be accurate (in as much as possible);
- Data will be entered in a consistent manner; and
- Agencies will strive for real-time, or close to real-time, data entry.

Participating agencies are responsible for the overall quality, accuracy and completeness of data entered by staff members.

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**5.04**  
Data user group

A representative(s) from each participating agency will regularly attend STEPS User Group meetings.

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**5.05**  
Data controls

Participating agencies and staff members will administer data by adhering to a set of controls required for enforcing and maintaining security standards. This includes, but is not limited to, data types, procedures for transmission and storage, data usage, and procedures for handling public, internal or restricted usage.

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Participating agencies and users will classify all data classified open or confidential before it is transmitted or stored.

**Failure to do so may result in a breach of client confidentiality  
and privacy protection.**

**5.06**  
Data types

There are two mutually exclusive types of data available in STEPS.

Open Data: Unrestricted information that contains no data elements that are or could be used as personal identifiers. Open Data is typically subject to further classification and scrutiny depending on the intent for the data and its audience. Unless this data is to be used as “Public Data,” then it should be handled discretely.

Open Data is typically subject to further classification and scrutiny depending on the intent for the data and its audience. Unless this data is to be used as “Public Data,” then it should be handled discretely.

Confidential Data: Information that can be used to identify a client whose information is contained within the STEPS. Examples include: Social Security Number, name, address, or any other information that can be used to identify a client. Any material that includes any confidential information shall be considered confidential data.

Confidential Data may be used for internal analysis or in the preliminary process of creating open data. STEPS Administrators may also work with confidential data in the process of assisting partner agencies or correcting system errors.

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There are three mutually-exclusive types of usage for STEPS data.. All data usage must be classified as either public, internal, or restricted. Below each category is described and corresponding procedures for usage of STEPS data are given.

**Failure to do so may result in a breach of client confidentiality  
and privacy protection.**

**5.07**  
Data usage

Public Usage: Information from STEPS that is shared with the general public in written, electronic or verbal format

Security controls are not required but data must not include any client identifiers such that an individual could be identified even through inference. The data shall reasonably reflect the elements from which it was derived and shall identify constraints or inferences related to its use or generalization.

Internal Usage: Information scheduled, but not yet approved, for publication. Examples include draft reports, fragments of data sets, or data without context.

Data is accessible only to internal employees. No auditing is required. No special requirements around destruction of these data are required. These data must be stored out of site and can be transmitted via internal or first-class mail.

Restricted Usage: Information that has been created or accessed primarily for administrative purposes. This data may or may not eventually be made public.

Data is available only on a need-to-know access basis. Requires auditing of access and must be stored in a secure location. There are not special requirements around destruction of these data. If mailed internally or externally, it must be labeled confidential.

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**5.08**  
Data protection

Participating agencies and staff will provide adequate protection of both hard and electronic copies of their data.

Hard copies of data shall be:

- Stored in a secure environment generally inaccessible to other staff or the public
- Not left out in the open or unattended; and
- Properly disposed when no longer needed following agency policy (i.e., shredded).

Electronic copies shall be:

- Stored only where approved staff members can access the data;
  - Stored where a password is required to access data if on shared server space;
  - Kept under the staff members physical control (e.g., CD-ROM, personal computer); and
  - Properly disposed when no longer needed following agency policy (i.e., deleted).
-

Participating agencies that wish to share client data with another participating agency must adhere to all baseline standards required for any organization that records, uses or processes Protected Personal information (PPI) as mentioned in Section 4, Confidentiality.

It is strongly recommended that each agency wait at least 10 months of consistent data entry and system use before they share data with another. The purpose of this is to better serve the Client through:

- Established privacy and confidentiality procedures,
- Increased familiarity with the system
- and Assured high quality data to the receiving agency.

**Agency's wishing to share data must:**

- 1) Notify the STEPS Administrator
- 2) Obtain consent from each client whose record is being shared electronically with a partner agency, then have the client signed a *Client Consent and Release of Information Authorization* (Appendix H, v.1 or v.2). The client must specify what information can be shared and with whom it can be shared

Record of Client Consent should be documented in two ways:

*Release of Information (ROI)*: Clients must sign a paper copy of the *Release of Information* form indicated their permission to share STEPS data with other agencies. The release must be kept on file at the agency. At minimum, one paper copy of a release of information is required per agency and will cover all programs within an agency (unless agency policy differs). Clients should be given a copy of the paper release form for their information if requested.

*Software Release of Information (ROI)*: Client consent to the release of information must be attached to the client profile in the *ServicePoint* software. The ROI must be established prior to completing any assessment information in each program the client enters. The length of the ROI is one year, unless agency policy specifies otherwise.

If the client refuses to participate in Inter-Agency Data Sharing then, a client refusal form should be completed and filed by each agency with a of COPY being sent from the STEPS Administrator (Appendix J).

- 3) Sharing agencies must complete the *Inter-Agency Data Sharing Agreement* of which a copy is to be sent to the STEPS Administrator (Appendix K).

## 5.09

### Inter-agency data sharing

## 5.10

### Client revocation of inter-agency data sharing

A client has the right to revoke consent for Inter-Agency Sharing at any time. When a client makes such a request, the agency staff person should ask the client to sign a *Revocation of Consent* (Appendix L) to be forwarded to the STEPS Administrator and immediately close or "re-lock" the client's record.

In instances where the client will not or is unable to complete the *Revocation of Consent* form, the staff person should immediately close or "re-lock" the record and complete the bottom section of the *Revocation of Consent* form stating that the client orally made the closure request and forward it to the STEPS Administrator. This will ensure that the client's record was properly closed. This policy will be reviewed with staff periodically.

In the event that a client would like to "re-open" their file to sharing, staff members should follow standard consent procedures including written and electronic documentation of the decision.

The STEPS Administrator and an Agency's Site Contact will work together to identify the most appropriate STEPS reports and assessments for that agency.

**5.11**  
Agency reports

Site Contacts will be trained on how to create and run their own agency level reports. Site contacts will be the primary agency resource for report creation.

It is recommended that an agency does not begin running reports until at least six (6) months of continuous data entry. This is to insure high quality of the data and its results.

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**5.12**  
General reports

It will be the responsibility of the STEPS Administrator to address all external requests for data from non-participating agencies. Periodic public reports regarding the homeless and those at-risk of becoming homeless within the CoC will be generated and shared. No confidential client data or agency specific data will be included in such reports.

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**5.13**  
Data monitoring

The STEPS Administrator will regularly monitor data collection activities and review compliance of data standards of participating agencies. This will be done by running data access and data quality audits of participating agencies. In doing so, the STEPS Administrator will ensure that each program is completing the required HUD and local data elements as part of their regular client assessments.

Results of these audits will be shared with agency Site Contacts and the STEPS Advisory Committee. Persistent patterns of error will be reported to Site Contacts and the Advisory Committee. It will be up to the Advisory Committee to suggest changes to data entry policies and/or procedures to participating agencies and/or end users.

## Policies and Procedures: Section 6

### Grievances

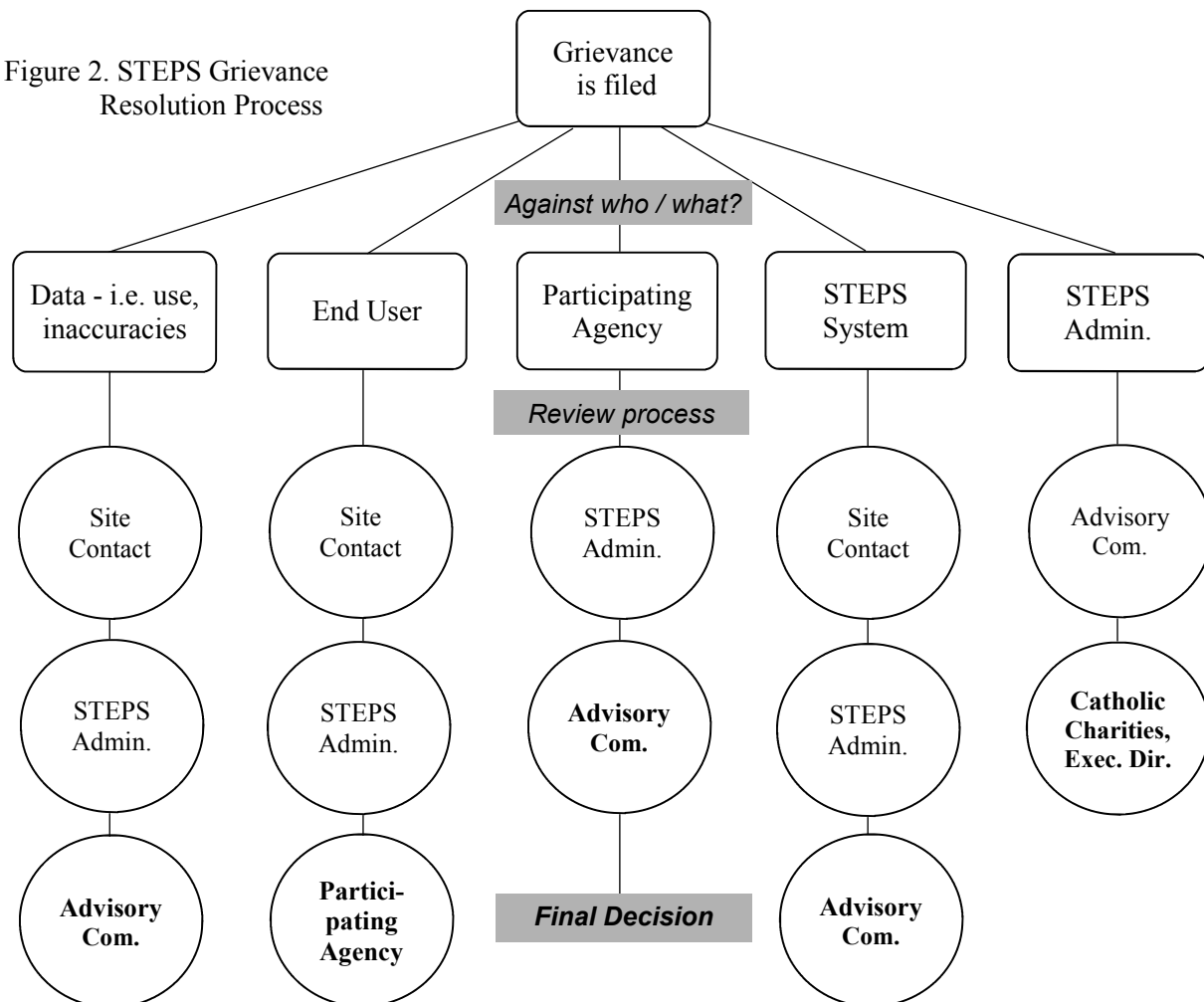
#### Policy Summary - 6.0

In the event of a grievance with overall STEPS operations, its privacy practices, staff, and/or use of data, a number of procedures have been established to address such issues. Depending on who or what a grievance is filed against, the review process will vary (Figure 2). In all instances, the STEPS Administrator will be involved in the grievance resolution process. While the STEPS Advisory Committee will provide input and its own recommendation for each instance, only the Executive Director of a participating agency has final decision regarding grievance resolution with an end user. Only the STEPS Advisory Committee can recommend that an agency's access to the system be terminated. In addition, the Advisory Committee will provide recommendations in regards to grievances against data issues, overall system operations and participating agencies. The Executive Director of Catholic Charities of Chemung County, NY will be responsible for resolving any grievances filed against the STEPS Administrator.

<u>Policy #</u>	<u>Topic</u>
6.01	Grievance monitoring
6.02	Client grievance filing
6.03	System grievance filing
6.04	System Administrator grievances

Related Documents: Appendix L *STEPS Grievance Form*

Figure 2. STEPS Grievance Resolution Process



**6.01**  
Grievance  
monitoring

The STEPS Advisory Committee will monitor all types of STEPS related grievances. The STEPS Administrator will be responsible for providing a summary of all grievances and their resolutions to the STEPS Advisory Committee on a monthly basis.

If necessary, the Committee will address and provide recommendations for any grievances against STEPS data, participating agencies, end users and overall system operations.

**As an Advisory Committee this group may only recommend final resolution actions.**

**6.02**  
Client  
grievance  
filing process

Clients with any STEPS-related grievance should first identify their concerns to an agency staff member. Upon learning of the grievance, the staff member is required to communicate the concern to their STEPS Site Contact for review and possible resolution.

Each participating agency is responsible for addressing client questions and complaints regarding STEPS to the best of their ability and in accordance with their agency grievance policies. Possible actions may include, but are not limited to: further investigation of incidents, clarification or review of policies and sanctions imposed by the participating agency.

Participating agencies are also obligated to report all STEPS-related client grievances to the STEPS Administrator using the STEPS *Grievance Form* (Appendix M)

If a client grievance is not satisfactorily resolved at the agency level, the client may contact the STEPS Administrator. The STEPS Administrator will attempt to resolve the issue. If necessary, the Administrator will present the problem to the STEPS Advisory Committee at their next meeting. The STEPS Advisory Committee will be given an opportunity to review the details and facts of a situation and will provide recommendations towards resolution.

**Participating Agencies have the final decision regarding grievance resolution and the action of their end-users.**

**6.03**  
System  
grievance  
filing

Any problems related to STEPS data, overall operations and/ or its participating agencies should be directed to the STEPS Administrator. S/he is responsible for addressing agency-level questions and complaints regarding the STEPS system to the best of their ability. Possible actions may include, but are not limited to further investigation of incidents, clarification or review of policies and/or temporary suspension of system access to end-users or agencies.

The STEPS Administrator is obligated to report all STEPS-related agency grievances to the STEPS Advisory Committee using the STEPS *Grievance Form* (Appendix M).

If an agency issue is not satisfactorily resolved by the STEPS Administrator, the agency may bring the issue to the STEPS Advisory Committee.

They will be given an opportunity to review the details and facts of a situation and will provide recommendations towards resolution.

**No STEPS End-user or participating agency can have their access to the system terminated without the recommendation of the Advisory Committee**

**6.04**  
STEPS  
Administrator  
grievances

Any grievances against the STEPS Administrator should be made directly to the Executive Director of Catholic Charities of Chemung County, NY for resolution.

*Appendix A - Agency Readiness Assessment*



# STEPS Readiness Assessment

3/17/2008

## GENERAL INFORMATION

Organization: \_\_\_\_\_

Date: \_\_\_\_\_

Person Interviewed: \_\_\_\_\_ Length at agency: \_\_\_\_\_

Position:	Exec. Dir.	Site Contact	End User	Other
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Activities/ Programs: \_\_\_\_\_

**To be reviewed and discussed by a representative from the participating Agency and the STEPS administrator.**

**SOFTWARE/HARDWARE:**

Which and how many computers will be used to access the system?

- |    |         |        |                                |                         |
|----|---------|--------|--------------------------------|-------------------------|
| 1. | A) Type | B) Age | C) Internet access<br>Y      N | D) Type of Connectivity |
| 2. | A) Type | B) Age | C) Internet access<br>Y      N | D) Type of Connectivity |
| 3. | A) Type | B) Age | C) Internet access<br>Y      N | D) Type of Connectivity |

Do employees/volunteers share computers?    Y        N        If yes, what is the ratio of worker/computer? \_\_\_\_:

If computers are shared, how is client security/privacy assured?

Is the computer(s) physically set up in a manner to protect client confidentiality? Y N

Explain:

How do you and your agency secure your equipment?

How does this agency protect electronic client information? NA (Catholic Charities) or Explain:

## RECORD KEEPING

Describe you current means or record keeping?    Electronic          Paper          Combination

What type of system are you using?

How long have you been using it?                      How satisfied are you with this system? 1      2      3      4

What do you like about it?

What do you dislike about it?

Describe how you track use of services including , client outcome tracking, billing service usage:

What are your funding sources:	HUD Local	FEMA State	United Way Federal	Donation Other	CDBG
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**RECORD KEEPING, Con't**

Does your current system have provisions for the following:

Client intake      Information/referral      Case Management      Service Tracking/reporting

What kind of reporting are you currently doing?      Quarterly      Annual      As needed

What is the format of your reporting?      Standard/required      Custom      Other

**DATA ENTRY/DATA QUALITY**

Describe your current process for a typical client intake?

Where \_\_\_\_\_ When \_\_\_\_\_ Length (Time) \_\_\_\_\_

Who: Staff or Volunteer      # intakes per day \_\_\_\_\_      # staff/volunteers doing intakes \_\_\_\_\_

What type of information do you collect? \_\_\_\_\_

How does this agency handle referrals?

Internally:

Externally:

Does this agency engage in case management with clients? Y      N

If so when /where does it take place? \_\_\_\_\_

How many staff members are involved? \_\_\_\_\_

How often do staff/volunteers record intake information?      Daily      Weekly      Monthly

**CONFIDENTIALITY/SECURITY**

Do you have any immediate questions or concerns? Y      N

(Review agency requirements: posting, agency and user agreements, training, ect.)

Is this organization covered under Health Insurance Portability and Accountability Act (HIPAA)? Y      N

Is your Organization covered under New York Mental Hygiene Act? Y      N

What policies and procedures does this organization have in place to protect client confidentiality? \_\_\_\_\_

**PERSONNEL READINESS**

	Low	Very Low	High	High	Very
Rate your current level of knowledge of STEPS?	1	2	3	4	
Rate your current level of interest in STEPS?	1	2	3	4	

What are you concerns and/or expectations about using STEPS? \_\_\_\_\_

**OVERALL READINESS**

Rate the overall readiness of this Agency to participate in STEPS.      1      2      3      4

Administrator Comments: \_\_\_\_\_

STEPS Administrator signature: \_\_\_\_\_

Date: \_\_\_\_\_

Appendix B - *Agency Participation Agreement*



## AGENCY PARTICIPATION AGREEMENT

This agreement is entered into on \_\_\_\_\_ (dd/mm/yy) between Catholic Charities of Chemung County, NY, hereafter known as, "CC" and \_\_\_\_\_, hereafter known as the Agency, regarding access and use of the Elmira / Chemung, Steuben and Allegheny HMIS, hereafter known as STEPS.

### I. Introduction

STEPS is an Internet-based, information database that allows authorized personnel at homeless and human service providers throughout the Elmira/Chemung, Steuben and Allegheny Counties to enter, track and report information concerning their own clients and to share information, subject to appropriate inter-agency agreement on common clients.

The goals of a STEPS are to:

- Improve coordinated care for and services for homeless persons and those at risk of being homeless in the Elmira/Chemung County, NY area
- Provide user-friendly and high quality automated records system that expedites client intake procedures, improves referral accuracy and supports the collection of quality information that can be used for program improvement and service-planning and
- Meet the reporting requirements of the U.S. Department of Housing and Urban Development (HUD) and other funds as needed.

In compliance with all federal requirements regarding client/consumer confidentiality and data security, STEPS is designed to collect and deliver timely, credible, high quality data about services and homeless persons and/or those persons at risk for being homeless. In order to gain access to the system, each agency needs complete the following *Steps to Participation*:

1) Readiness Assessment - Upon notification to the STEPS Administrator, interested agencies will receive a copy of the Standard Operating Procedures (SOP) for their review. A readiness assessment / site visit will be scheduled with agency staff and the STEPS administrator meet to review current record keeping needs and methods, client intake procedure, security/confidentiality issues, equipment and internet connection check and overall agency readiness.

2) Completion of Agency and end-user agreement. - Upon successful completion of the readiness assessment, participating agencies will be asked to review and sign a *Agency Participation Agreement*. This document outlines the responsibilities, obligations and project expectations for participating agencies. In addition, agency staff who will be end users of the system are required to complete the *End-user Rules, Responsibilities and Code of Ethics Agreements*. Copies of the documents listed are available in the SOP.

3) System Training - Upon return of signed document listed above, agency staff will attend system training. All users must demonstrate mastery of training information, prior to the activation of user IDs and passwords. Post evaluation surveys must also be completed and submitted to the STEPS Administrator.

4) System Access - Upon successful completion of system training, users will be given their User IDs and passwords. Initial passwords are only temporary and must be changed when the user first enters the system.

5) Site Contacts - After a participating agency begins using the system a Site Contact for the agency will be established. The site contact will serve as the Participating Agency's contact for the project and will facilitate access to the STEPS at an organizational level. Having a Site Contact will also increase the effectiveness of communication both between and within agencies.

## I. Introduction, Continued

STEPS utilizes the *ServicePoint* is a client information management system developed by Bowman Internet Systems, Inc. *ServicePoint* is a client information system that provides a standardized assessment of consumer need, creates individualized service plans and records the use of housing and services. Communities can use this information to better understand the use of services, identify gaps in the local service continuum and develop outcome measurements.

Parties in this Agreement are CC, who is the coordinating agency of STEPS, the STEPS administrator, and the “Agency” who is named above in the agreement.

References in this Agreement to “Partner Agency” describe all other agencies entering into an Agency Participation Agreement. “Client” is a consumer of services.

Signatures of Executive Directors from CC and the Agency indicate agreement within terms set forth before a *ServicePoint* account can be established for the Agency.

## II. CC Responsibilities

1. CC will provide the Agency 24-hour access to the STEPS data gathering system, via Internet connection.
2. CC will provide *Public Notice*, *Privacy Policy* and *Client Release of Information (ROI)* forms.
3. CC will provide initial and additional training to end users of the STEPS system.
4. CC will provide basic user support and technical assistance (i.e. general trouble shooting and assistance with standard report generation) in accordance with procedures that will be periodically updated and published by CC. Access to this basic technical assistance will be generally be available Monday through Friday, from 8:30 - 4:00 pm, as the STEPS administrator’s schedule permits. If service is not immediately available, in general a response will be given within 24 hours.

**The STEPS Administrator and CC are NOT responsible for providing trouble shooting topics for Agency hardware, software, internet connectivity issues or providing remedial computer training to system users.**

5. CC will not publish reports on Client Data that identify specific agencies or persons without prior agency (and where necessary, client) permission. Public reports otherwise published will be limited to presentation of aggregate or summary data within STEPS.

## III. Privacy and Confidentiality

### A. Protection of Client Privacy

1. The Agency that is considered a “covered entity” under the Health Insurance Portability and Accountability Act (HIPAA) of 1996, 45 C.F.R., Parts 160 & 164, and corresponding regulations established by the U.S Department of Health and Human Services is required to operate in accordance with HIPAA regulations.
2. The Agency not considered a “covered entity” under the Health Insurance Portability and Accountability Act (HIPAA) of 1996, 45 C.F.R., Parts 160 & 164, and corresponding regulations established by the U.S Department of Health and Human Services is required to operate in accordance with HMIS privacy and security rules.
3. The Agency shall comply with all applicable federal and state laws regarding protection of client privacy.
4. The agency will comply with all policies and procedures established by CC pertaining to protection of client privacy.

### III. Privacy and Confidentiality, Continued

#### B. Client Confidentiality

1. The Agency agrees to post a Consumer Notice at point of data collection to inform clients of their intent to collect and enter data into the STEPS. Copies of the notice will be available to Clients upon request.
2. The Agency will provide copies of the Privacy Protection Notice, detailing all privacy protection policies set in place within STEPS, to any client upon request.
3. The Agency will provide an oral explanation of STEPS and arrange for an appropriate interpreter in the event that an individual has difficulty understanding the material or does not use English as a first language.
4. The Agency will not solicit or enter information from Clients into the STEPS unless it is essential to provide services, conduct evaluation or research.
5. The Agency will not divulge any confidential information received from the STEPS to any organization or individual without proper written consent by the client, unless otherwise permitted by applicable regulations or laws.
6. The Agency will ensure that all persons issued User ID and Password abide by both the Agency and User Agreements, including all associated confidentiality provisions. The agency will be responsible for oversight of its own related confidentiality requirements.
7. The Agency will insure that all persons issued a User ID and Password will complete a formal training, provided by Bowman Internet System, STEPS Administrator or STEPS-designated trainer, on privacy and confidentiality. All users must demonstrate mastery of that information prior to the activation of their user license.
8. The Agency agrees that those granted Agency Administrator system access must first become a STEPS Agency Administrator through training provided by Bowman Internet System, STEPS Administrator or a STEPS-designated trainer.
9. The Agency acknowledges that ensuring the confidentiality, security and privacy of any information download from the system by the agency is strictly the responsibility of the Agency.

#### C. Inter-Agency Data Sharing

1. The Agency acknowledges that forms provided by CC (via the STEPS Administrator) regarding Client privacy and confidentiality are models which may require modifications in accordance with Agency - specific rules. Any modification to forms must be submitted in writing, reviewed and approved by CC.
2. The Agency acknowledges that Client consent is required before any basic identifying Client information is shared with other agencies in the system. The Agency will document Client consent on the *Client Consent and Release of Information Authorization* form.
3. If the Client has given approval through a completed STEPS *Client Consent and Release of Information Authorization* form, the Agency may elect to share information according to *Inter-Agency Data Sharing Agreement* that the Agency has negotiated with other partnering agencies in STEPS.
4. The Agency agrees to develop a plan for all routine sharing practices with partnering Agencies and document that plan through a fully executed *Inter-Agency Data Sharing Agreement* form.

### C. Inter-Agency Data Sharing, Continued

5. The Agency will incorporate an STEPS Release Clause into its Client *Release of Information (ROI)* form(s) if an agency intends to share restricted client data within STEPS.
6. Restricted information, including progress and psychotherapy notes about the diagnosis, treatment or referrals related to a mental health disorder, drug or alcohol disorder, HIV/AIDS and domestic violence concerns shall NOT be shared with other participating agencies without the client's written, informed consent as documented on the Agency's Release of Information Authorization form. The sharing of restricted information is NOT covered under the general STEPS Client *Release of Information (ROI)* form. Sharing or restricted information must also be planned and documented through a fully executed *Inter-Agency Sharing Agreement*.
7. Agencies with whom information is shared are each responsible for obtaining appropriate consent(s) before allowing further sharing of client records.
8. The agency acknowledges that the agency, itself, bears primary responsibility for oversight for all sharing of data it has collected via the STEPS.
9. The Agency agrees to place all Client *Release of Information (ROI)* forms related to STEPS in a file located at the agencies primary location and that such forms will be made available to STEPS for occasional audits. The agency will retain these STEPS related forms for a period of seven (7) years, after which time the forms will be discarded in a way that ensures that client confidentiality is not compromised.
10. **The agency acknowledges that clients who choose not to authorize sharing of information shall not be denied services for which they would otherwise be eligible.**

### D. Custody of Data

1. The Agency acknowledges and CC, agrees, that the Agency retains ownership of all information it enters into STEPS.
2. The Agency understands that client data will be encrypted at the server level using encryption technology.
3. The Agency understands the file server, which will contain all client information, including encrypted identifying client information, will be located at Bowman Internet Systems, Inc., with offices at 400 Travis Street, Suite 1900, Shreveport, LA 71101.
4. If this agreement is terminated, CC and remaining partner agencies shall remain their right to the use of all client data previously entered by the terminating agency. This use is subject to any restrictions requested by the client.
5. In the event that STEPS ceases to exist, partner agencies will be notified and provided reasonable time to access and save client data on those served by the agency, as well as statistical and frequency data from the entire system. Thereafter, the information collected by the centralized server will be purged or appropriately stored.
6. In the event that CC ceases to exist, the custodianship of the data within STEPS will be transferred by CC to another organization for continued administration, and all STEPS Partner Agencies will be informed in a timely manner.

#### IV. Data Entry and Regular Uses of STEPS

1. The Agency shall follow, comply with and enforce the *User Policy, Responsibility Statement* and *Code of Ethics* forms signed by agency employees. The *User Policy, Responsibility Statement* and *Code of Ethics* forms may be modified by CC as needed for the purpose of the smooth and efficient operation of STEPS. CC will announce approved modification to *User Policy, Responsibility Statement* and *Code of Ethics* forms in a timely manner.
2. The Agency will not permit User Ids and Passwords to be shared among users.
3. The Agency will only enter data into the STEPS for individuals that exist as clients under the Agency's jurisdiction. The Agency shall not misrepresent its client base in the STEPS system by entering known inaccurate information.
4. The Agency will not alter information that is entered into STEPS by another Agency with known inaccurate information (i.e., The Agency will not purposefully enter inaccurate information to override information previously entered by another agency).
5. The Agency will not knowingly enter inaccurate information into STEPS.
6. The Agency shall use client information in the *ServicePoint* database, as provided to the Agency or partner organization, to assist the Agency in providing adequate and appropriate services to the client.
7. If a Client has previously given the Agency permission to share information with multiple agencies beyond basic identifying information and non-restricted services transactions, and then chooses to revoke permission to one or more of these agencies, the Agency will contact its Partner Agency or Agencies and explain that, at the client's request, portions of the client record will no longer be shared. The Agency will then "lock" those portions of the record impacted by the revocation to the other agency or agencies.
8. If the Agency receives information that necessitates a client's information be entirely removed from STEPS, the Agency will instruct the client to complete a brief statement, which will be sent to the STEPS administrator for deactivation of the client record.
9. The Agency will enter all required data elements as defined by the STEPS Advisory Committee and the U.S. Department of Housing and Urban Development (HUD).
10. The Agency will enter data in a consistent manner and will strive for real time or close to real time data entry.
11. The Agency will routinely review records it has entered into STEPS for completeness and data accuracy.
12. The Agency acknowledges that with current standards, STEPS Client *Release of Information* form on file, it can update, edit and print out a client's information. Once the form is expired, the Agency can no longer edit or print the record.
13. The Agency acknowledges that once Client *Release of Information (ROI)* forms expire, any new information entered into the database will be closed to sharing. Information entered before the date of the expired release will continue to be available to the sharing partners.
14. The Agency acknowledges that a modified-Agency *Release of Information (ROI)* form, with a STEPS clause, permits it to share restricted client information with select agencies in compliance with the Agency's approved confidentiality, policies and procedures.



#### **IV. Data Entry and Regular Uses of STEPS**

15. The Agency will prohibit anyone with system access from entering offensive language, profanity or discriminatory comments based on race, color, religion, national origin, ancestry, handicap, age, sex and/or sexual orientation.
16. The Agency and its employees will utilize STEPS for business purposes only.
17. The Agency will keep updated virus protection software on Agency computers that access STEPS.
18. Transmission of material in violation of any U.S. federal or state regulations is prohibited. This includes, but is not limited to, copyrighted material, material legally judged to be threatening or obscene and material considered protected by trade secret.
19. The Agency will not use STEPS with intent to defraud the federal, state or local government or an individual entity or to conduct any illegal activity.
20. The Agency agrees that CC may convene local or regional user-group meetings to discuss procedures, updates, policy and practice guidelines, data analysis and software/hardware upgrades. The Agency will designate at least one specific staff member to regularly attend user meetings.
21. The Agency will incorporate procedures for responding to client concerns regarding use of STEPS into its existing grievance policy and procedures. While appeals to the Agency regarding STEPS should not be considered part of the formal process, a copy of any STEPS-related grievances and the Agency's response must be submitted to Advisory Committee via the STEPS Administrator.
22. Notwithstanding any other provision of this Participation Agreement, the Agency agrees to abide by all policies and procedures relevant to the use of STEPS that CC publishes from time to time.

#### **V. Publication of Reports**

1. The Agency agrees that it may only release aggregated or summary information generated by STEPS that is specific to its own services.
2. The Agency shall retain access to identifying and statistical data on the clients it services.
3. The Agency may make aggregated data available to other entities for funding or planning purposes pertaining to providing services to homeless persons or those at risk of being homeless. However, such aggregate data should not directly identify individual clients or agencies without expressed permission.
4. CC will use only unidentified, aggregate STEPS data for homeless policy and planning decisions, in preparing federal, state or local applications for homelessness funding, to demonstrate the need for and effectiveness of a program and to obtain a view of program utilization.

#### **VI. Database Integrity**

1. The Agency will not share assigned User IDs and Passwords to access STEPS with any other organization, governmental entity, business or individual.
2. The Agency will not intentionally cause corruption of STEPS in any manner. Any unauthorized access or unauthorized modification to computer system information or interface with normal system operations will result in immediate suspension of services and where appropriate legal action against the offending entities.

## VII. Hold Harmless

1. CC makes no warranties, expressed or implied. The Agency, at all times, will indemnify and hold CC harmless from any damages, liabilities, claims and expenses that may be claimed against the Agency; or for injuries or damages to the Agency or another party arising from participation in the STEPS; or arising from any acts, omissions, neglect or fault of the Agency or its agents, employees, licensees or clients; or arising from the Agency's failure to comply with laws, statutes, ordinances or regulations applicable to it or the conduct of its business.
2. The Agency will hold CC harmless for loss or damage resulting in the loss of data due to delays, non-deliveries, mis-deliveries or service interruption caused by Bowman Internet Systems, by the Agency's or other member Agency's negligence or errors or omission, as well as natural disasters, technical difficulties and/or acts of God.
3. CC shall not be liable to the Agency for damages, losses or injuries to the agency or another party other than if such is the result of gross negligence or willful misconduct of CC.
4. CC agrees to hold the Agency harmless from any damages, liabilities, claims or expenses caused solely by the negligence or misconduct of CC.
5. The Agency agrees to keep in force a comprehensive general liability insurance policy with combined single limit coverage of not less than one million dollars (\$1,000,000). Said insurance policy shall include coverage for theft or damage of the Agency STEPS-related hardware and software, as well as coverage of Agency's indemnification obligations under this agreement. The Agency shall list CC as additionally insured in such coverage.

## VIII. Terms and Conditions

1. The Parties hereto agree that this agreement is the complete and exclusive statement of the agreement between parties and supersedes all prior proposals and understandings, oral and written, relating to the subject matter of this agreement.
2. The Agency shall not transfer or assign any rights or obligations under the Participation Agreement without the written consent of CC.
3. This agreement shall remain in force until revoked in writing by either party, with 30 days advance written notice. The exception to this term is if allegations or actual incidences arise regarding possible or actual breaches of this agreement. Should such situations arise, CC may immediately suspend access to STEPS until the allegations are resolved in order to protect the integrity of the system.
4. This agreement may be modified or amended by written agreement executed by both parties with 30 days advance written notice.

Signature of Executive Director	Date	Signature of Catholic Charities, Exec. Dir.	Date
AGENCY	FEIN	AGENCY	FEIN
STREET ADDRESS		STREET ADDRESS	
CITY, STATE	ZIP CODE	CITY, STATE	ZIP CODE
MAILING ADDRESS (IF DIFFERENT THAN ABOVE)		MAILING ADDRESS (IF DIFFERENT THAN ABOVE)	
CITY / STATE	ZIP CODE	CITY / STATE	ZIP CODE

*Appendix C - User Policy, Responsibilities and Code of Ethics*



3/17/2008

## USER POLICY, RESPONSIBILITIES STATEMENT & CODE OF ETHICS

### USER POLICY

Partner Agencies will share information for provision of services to homeless persons through a networked infrastructure that establishes electronic communication among the Partner Agencies.

Partner Agencies will at all times have rights to the data pertaining to their Clients that was created or entered by them in STEPS. Partner Agencies shall be bound by all restrictions imposed by Clients pertaining to the use of personal data that they do not formally release.

It is a Client's decision about which information, if any, entered into STEPS shall be shared and with which Partner Agencies. The STEPS Client *Release of Information (ROI)* shall be signed if the Client agrees to share information with Partner Agencies.

Minimum data entry on each consenting Client will be:

- \* **Name, DOB and SS#**
- \* **STEPS profile page**

Data necessary for the development of aggregate reports of homeless services, including services needed, services provided, referrals and Client goals and outcomes should be entered to the greatest extent possible.

STEPS is a tool to assist agencies in focusing services and locating alternative resources to help homeless persons and those at-risk of being homeless. Therefore, agency staff should use the Client information in STEPS system to target services to the Client's needs.

### USER RESPONSIBILITY

Your User ID and Password gives you access to STEPS. Initial each item below to indicate your understanding and acceptance of the proper use of your User ID and password. Failure to uphold the confidentiality standards set forth below will result in disciplinary actions as recommended by the STEPS Advisory Committee.

- \_\_\_\_\_ My User ID and Password are for my use only and must not be shared with anyone.
- \_\_\_\_\_ I must take all reasonable means to keep my Password physically secure.
- \_\_\_\_\_ I understand that the only individuals who can view information in STEPS are authorized users and the Clients to whom the information pertains.
- \_\_\_\_\_ I may only view, obtain, disclose, or use information necessary to perform my job.
- \_\_\_\_\_ If I am logged into STEPS and must leave the work area where the computer is located, I **must log-off** of STEPS before leaving the work area.
- \_\_\_\_\_ A computer that has STEPS "open and running" shall never be left unattended.
- \_\_\_\_\_ Failure to log off STEPS appropriately may result in a breach in Client confidentiality and system security.
- \_\_\_\_\_ Hard copies of STEPS information must be kept in a secure file.
- \_\_\_\_\_ When hard copies of STEPS information are no longer needed, they must be properly destroyed to maintain confidentiality.
- \_\_\_\_\_ If I notice or suspect a security breach, I must immediately notify my Site Contact or STEPS Administrator.

## USER CODE OF ETHICS

STEPS Users must treat Partner Agencies with respect, fairness and good faith.

Each STEPS User should maintain high standards of professional conduct in the capacity as a STEPS User.

The STEPS User has primary responsibility for his/her Client(s).

STEPS Users have the responsibility to relate to the Clients of other Partner Agencies with full professional consideration.

I understand and agree to comply with all the statements listed above.

---

STEPS User Signature

Date

---

STEPS Site Contact

Date

**NOTE:** *The STEPS Site Contact must sign all User Policy forms for the agency's STEPS Users. STEPS staff will sign the User Policy forms for Site Contacts*

*Appendix D - Security Incident Report*

Organization:

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A separate typed sheet explaining the incident may also be submitted.

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

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## Appendix E - *Security Incident Review*



Date of Security Incident Review:

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- Evaluate the timeliness, thoroughness, and appropriateness of the staff member's response to the security incident;
- Ascertain if the security incident could have been prevented;
- Recommend corrective actions, if warranted;
- Evaluate security incidents for trends and patterns;
- Monitor the agency's compliance with the security policies and protocols;
- Monitor the implementation of any preventative or corrective action; and
- Recommend changes to the STEPS Advisory Committee regarding policies, procedures and practices, and working agreements that will reduce the likelihood that similar security incidents would occur.

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

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## Appendix F - *Consumer Notice*

# Consumer Notice

We collect personal information directly from you for reasons that are discussed in our privacy notice. We may be required to collect some personal information by law or by some organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons or those at risk of being homeless and better understand their needs.

We only collect information that we consider to be appropriate. The collection and use of all personal information is guided by strict standards of confidentiality.

A copy of our privacy notice describing our privacy notice is available upon request.



For more information, regarding STEPS, please contact the STEPS Administrator at : (607) 734 - 9874, Ext. 169

*Appendix G - Privacy Protection Policy*



## PRIVACY PROTECTION POLICY

### **THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND SHARED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION**

Effective Date: 10/1/07

\_\_\_\_\_ collects information about people who access services. When we meet with you, you will be asked questions about you and your family. It will then be entered into a computer program called STEPS. This information helps us keep track of your information. However, certain personal information is considered "*Protected Information*". We are required to protect the privacy of your identifying information and give you notice about how, when, and why we may use it.

We are also required to follow the privacy practices described in this notice, although \_\_\_\_\_ reserves the right to change our privacy practices and the terms of this notice at any time.

#### **HOW WE MAY USE AND DISCLOSE YOUR INFORMATION**

We use and disclose grouped information for a variety of community reports. We have a limited right to include some of your information on homelessness and services used by those who are homeless or at risk of being homeless. Information that could be used to identify who you are will never be used in these reports. We will not turn your information over to a national database. For uses beyond such reports, we must have your written consent. Please review our *Client Release of Information* form for details. You must sign this form before we can share your information but you do not have to sign the form in order to receive services.

#### **YOUR RIGHTS REGARDING YOUR INFORMATION**

- You have the right to get services even if you choose not to allow your information be added to the database,
- You have the right to know who has seen your information and
- You have the right to see your information and to request changes to it.

If you feel your rights were violated, information about filing a grievance is available. If you would like to file a grievance, please ask a staff person to receive information about the necessary actions.

*Appendix H - Client Release of Information (ROI)*

3/17/2008



## CLIENT RELEASE OF INFORMATION (ROI)

I, \_\_\_\_\_, authorize \_\_\_\_\_ to share my personal information with other agencies Participating in STEPS in order to provide me with needed and available services. I understand that I may cancel this authorization at any time by written request, but the cancellation will be active as of that date and not before it. I understand that this release is valid for three (3) years from the date of this document unless otherwise specified.

\_\_\_\_\_  
Client / Guardian Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Witness Signature

\_\_\_\_\_  
Date

*Appendix I - Refusal to Participate in Inter-Agency Data Sharing*



3/17/2008



## CLIENT REFUSAL

### Interagency Data Sharing

I hereby refuse to authorize \_\_\_\_\_ (Agency 1) to release information to the  
\_\_\_\_\_ (Agency 2).

\_\_\_\_\_  
SIGNATURE OF CLIENT

(PARENT OR GUARDIAN if under 18 years of age.)

\_\_\_\_\_  
SIGNATURE OF WITNESS

\_\_\_\_\_  
DATE

\_\_\_\_\_  
DATE

*Appendix J - Inter-Agency Data Sharing Agreement*



## INTER-AGENCY DATA SHARING AGREEMENT

Catholic Charities of Chemung County administers a computerized management information system that captures information about people and families who are homeless or at risk of being homeless and the services they utilize. This system known as Southern Tier Entry to Program Services (STEPS), enables programs to electronically share information about clients who have been entered in the system. Client-level information can only be shared between agencies that have established an Inter-Agency sharing Agreement and have received written consent from clients who agree to share their personal information with another agency. The agency receiving written consent has the ability to "share" Client information electronically through the system with the collaborating agency.

This process can benefit clients by eliminating duplicate intakes. Intake and exit interviews can be shared, with written consent, between \_\_\_\_\_ and \_\_\_\_\_ **(Names of collaborating agencies).**

By establishing this agreement, we the above listed agencies, agree that within the confines of STEPS:

- 1) System information in either paper or electronic form will never be shared outside of the originating agency without Client written consent.
- 2) Client-level information will only be shared electronically through the System with agencies the Client has authorized to see their information.
- 3) Information that is shared with written consent will not be used to harm or deny any services to a client.
- 4) A violation of the above by any agency employee will result in immediate disciplinary action by the Agency.
- 5) Information will be deleted from the system upon Client request.
- 6) Clients have the right to request information about who has viewed or updated their records on STEPS.
- 7) Agencies must comply with all applicable federal and state laws and regulations regarding privacy and confidentiality.

We, at \_\_\_\_\_ and \_\_\_\_\_ (Names of collaborating agencies) establish this Inter-Agency Sharing Agreement so that our agencies will have the ability to share Client-level information electronically through STEPS. This agreement does not pertain to Client-level information that has not been entered into the system. This electronic sharing capability only provides us with a tool to share Client-level information. This tool will only be used when a client provides written consent to have their information shared.

\_\_\_\_\_ and \_\_\_\_\_ (Names of Collaborating agencies) also have an agreement with Catholic Charities of Chemung County and have completed security procedures regarding the protection and sharing of client data.

By signing this form, on behalf of our agencies, I authorize Catholic Charities of Chemung County, New York to allow us to share information between our agencies through STEPS. We agree to follow all of the above policies to share information between our collaborating agencies.

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Agency 1

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Agency 1

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Print Name of Executive Director

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Print Name of Executive Director

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Signature of Executive Director

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Signature of Executive Director

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Date

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Date

*Appendix K - Revocation of Consent (Inter-Agency Data Sharing Agreement)*

3/17/2008



**REVOCATION OF CONSENT -  
INTER-AGENCY DATA SHARING**

I hereby cancel my permission for \_\_\_\_\_ (Name of Agency 1) to release information to \_\_\_\_\_ (Agency 2) . The cancellation becomes effective on the date signed. \_\_\_\_\_ is not required to retrieve information disclosed prior to the cancellation.

Reason(s) why: \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF CLIENT  
(PARENT OR GUARDIAN if under 18 years of age.)

\_\_\_\_\_  
SIGNATURE OF WITNESS

\_\_\_\_\_  
DATE

\_\_\_\_\_  
DATE

*Appendix L - STEPS Grievance Form*





## **Homeless Management Information System Acronyms and Terms**

### **Acronyms**

AIRS - Alliance of Information & Referral Systems

AHAR - Annual Homeless Assessment Report

APR - Annual Progress Report

CHO - Covered Homeless Organization

CoC - Continuum of Care

CSMIS - Community Service Management Information System

DOB - Date of Birth

DV - Domestic Violence

ESG - Emergency Shelter Grants

FIPS - Federal Information Processing Standards Codes for states, counties, and named populated places.

HIPAA - Health Insurance Portability and Accountability Act of 1996

HMIS - Homeless Management Information System

HUD - U.S. Department of Housing and Urban Development

I&R - Information and Referral

MH - Mental Health

NOFA - Notice of Funding Availability

PIT - Point in Time

PKI - Public Key Infrastructure

PPI - Personal Protected Information

S+C - Shelter Plus Care (McKinney Vento Program)

SA - Substance Abuse

SHP - Supportive Housing Program

SRO - Single Room Occupancy

SuperNOFA - Super Notice of Funding Availability.

SSN - Social Security Number

SSI - Supplemental Security Income

SSO - Supportive Services Only

STEPS – Southern Tier Entry to Programs & Services

TA - Technical Assistance

TANF - Temporary Assistance for Needy Families

VAWA - Violence Against Women Act

XML - Extensible Markup Language

## **STEPS (HMIS) TERMS**

***Alliance of Information and Referral Systems (AIRS)*** -The professional association for over 1,000 community information and referral (I&R) providers serving primarily the United States and Canada. AIRS maintains a taxonomy of human services.

***Annual Progress Report (APR)*** – A report that tracks program progress and accomplishments in HUD's competitive homeless assistance programs. The APR provides the grantee and HUD with information necessary to assess each grantee's performance.

***Audit Trail*** - A record showing who has accessed a computer system and what operations he or she has performed during a given period of time. Most database management systems include an audit trail component.

***Bed Utilization*** - An indicator of whether shelter beds are occupied on a particular night or over a period of time.

***Biometrics*** - Refers to the identification of a person by computerized images of a physical feature, usually a person's fingerprint.

***Chronic homelessness*** - HUD defines a chronically homeless person as an unaccompanied homeless individual with a disabling condition who has either been continuously homeless for a year or more OR has had at least four (4) episodes of homelessness in the past three (3) years. To be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency homeless shelter during that time.

***Client Intake*** - The process of collecting client information upon entrance into a program.

***Consumer*** - An individual or family who has or is currently is experiencing homelessness.

***Continuum of Care (CoC)*** - A community with a unified plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency. HUD funds many homeless programs and HMIS implementations through Continuums of Care grants.

***Coverage*** - A term commonly used by CoCs or homeless providers. It refers to the number of beds represented in an HMIS divided by the total number of beds available.

***Covered Homeless Organization (CHO)***- Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes data on homeless clients for an HMIS. The requirements of the HMIS Final Notice apply to all Covered Homeless Organizations.

***Data Quality*** - The accuracy and completeness of all information collected and reported to the HMIS.

***Data Standards*** - See *HMIS Data and Technical Standards Final Notice*.

***De-identification*** - The process of removing or altering data in a client record that could be used to identify the person. This technique allows research, training, or other non-clinical applications to use real data without violating client privacy.

***Digital Certificates*** - An attachment to an electronic message used for security purposes. The most common use of a digital certificate is to verify that a user is sending a message is who he or she claims to be and to provide the receiver with the means to encode a reply.

**Disabling Condition** - A disabling condition in reference to chronic homelessness is defined by HUD as a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions. A disabling condition limits an individual's ability to work or perform one or more activities of daily living.

**Emergency Shelter** - Any facility whose primary purpose is to provide temporary shelter for the homeless in general or for specific populations of the homeless.

**Emergency Shelter Grant (ESG)** - A federal grant program designed to help improve the quality of existing emergency shelters for the homeless, to make available additional shelters, to meet the costs of operating shelters, to provide essential social services to homeless individuals, and to help prevent homelessness.

**Encryption** - Conversion of plain text into unreadable data by scrambling it using a code that masks the meaning of the data to any unauthorized viewer. Computers encrypt data by using algorithms or formulas. Encrypted data are not readable unless they are converted back into plain text via decryption.

128 bit encryption, the industry standard, refers to the amount of space and number of characters used to create the key and the scrambled data.

Triple DES encryption is the same as 128 bit encryption except that it has been encrypted 3 times. In order to be unscrambled, the receiving computer must know all 3 codes.

**Final Notice** - See *HMIS Data and Technical Standards Final Notice*

**Firewall** - A way to regulate the flow of traffic between [computer networks](#) of different trust levels. Its purpose is to prevent unauthorized internet users from accessing private networks connected to the Internet. This can be on a network or individual computer. All messages entering or leaving the intranet pass through the firewall, which examines each message and blocks those that do not meet the specified security criteria.

**Hashing** - The process of producing hashed values for accessing data or for security. A hashed value is a number or series of numbers generated from input data. The hash is generated by a formula in such a way that it is extremely unlikely that some other text will produce the same hash value or that data can be converted back to the original text. Hashing is often used to check whether two texts are identical. For the purposes of Homeless Management Information Systems it can be used to compare whether client records contain the same information without identifying the clients.

**Homeless Management Information System (HMIS)** - The U.S. Department of Housing and Urban Development (HUD) name for a computerized data collection tool designed to capture client-level information over time on the characteristics and service needs of men, women, and children experiencing homelessness.

**HMIS Data and Technical Standards Final Notice** - Regulations issued by HUD via the Federal Register describing the requirements for implementing HMIS. The HMIS Final Notice contains rules about who needs to participate in HMIS, what data to collect, and how to protect client information.

**Inferred Consent** - Once clients receive an oral explanation of HMIS, consent is assumed for data entry into HMIS. The client must be a person of age, and in possession of all his/her faculties (for example, not mentally ill).

**Informed Consent** - A client is informed of options of participating in an HMIS system and then specifically asked to consent. The individual needs to be of age and in possession of all of his faculties (for example, not mentally ill), and his/her judgment not impaired at the time of consenting (by sleep, illness, intoxication, alcohol, drugs or other health problems, etc.).

**Information and Referral** - A process for obtaining information about programs and services available and linking individuals to these services. These services can include emergency food pantries, rental assistance, public health clinics, childcare resources, support groups, legal aid, and a variety of non-profit and governmental agencies. An HMIS usually includes features to facilitate information and referral.

**McKinney-Vento Act** - The McKinney-Vento Homeless Assistance Act was signed into law by President Ronald Reagan on July 22, 1987. The McKinney-Vento Act funds numerous programs providing a range of services to homeless people, including the Continuum of Care Programs: the Supportive Housing Program, the Shelter Plus Care Program, and the Single Room Occupancy Program, as well as the Emergency Shelter Grant Program.

**Notice of Funding Availability** - An announcement of funding available for a particular program or activity. See also SuperNOFA.

**Password Protected Computer** - A PC that requires you to sign on using a User ID and Password. The amount of time the PC can sit idle before needing the User ID and password again, can be adjusted.

**Penetration Testing** - The process of probing a computer system with the goal of identifying security vulnerabilities in a network and the extent to which outside parties might exploit them.

**Permanent Supportive Housing** - Long term, community based housing that has supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live independently as possible in a permanent setting. Permanent housing can be provided in one structure or in several structures at one site or in multiple structures at scattered sites.

**Point in Time Inventory** - A calculation of the numbers of beds in a region on one particular night.

**Point in Time Count** - A snapshot of the homeless population taken on a given day. Since 2005, HUD requires all CoC applicants to complete this count every other year in the last week of January. This count includes a street count in addition to a count of all clients in emergency and transitional beds.

**Privacy Notice** - A written, public statement of an agency's privacy practices. A notice informs clients of how personal information is used and disclosed. According to the HMIS Data and Technical Standard, all covered homeless organizations must have a privacy notice.

**Program Data Elements** - Data elements required for programs that receive funding under the McKinney-Vento Homeless Assistance Act and complete the Annual Progress Reports (APRs).

**Public Keys** - Public keys are included in digital certificates and contain information that a sender can use to encrypt information such that only a particular key can read. The recipient can also verify the identity of the sender through the sender's public key.

**Scan Cards** - Some communities use ID cards with bar codes to reduce intake time by electronically scanning ID cards to register clients in a bed for a night. These ID cards are commonly referred to as scan cards.

**Secure Websites or SSL** - A Secure Socket Layer (SSL) is a process by which private documents can be moved over the internet. SSL works by using a private key to encrypt data that is being transferred. These secure web sites will start their web address with an *https* rather than *http*. Netscape Navigator and Internet Explorer use SSL while HMIS and the *ServicePoint* website use a special process to obtain confidential information.

**Security** - Refers to the protection of client personal protected information and sensitive program information from unauthorized access, use or modification.

**Single Room Occupancy** - A residential property that includes multiple single room dwelling units. Each unit is for occupancy by a single eligible individual. The unit need not, but may, contain food preparation or sanitary facilities, or both. It provides rental assistance on behalf of homeless individuals in connection with moderate rehabilitation of SRO dwellings.

**Shelter Plus Care Program** - A program that provides grants for rental assistance for homeless persons with disabilities through four component programs: Tenant, Sponsor, Project, and Single Room Occupancy (SRO) Rental Assistance.

**Super Notice of Funding Availability** - The consolidation of all HUD's homeless grants program into one Notice of funding availability. The SuperNOFA funds the Continuum of Care Competition.

**Supportive Housing Program** - A program that provides housing, including housing units and group quarters that has a supportive environment and includes a planned service component.

**Supportive Services** - Services that may assist homeless participants in the transition from the streets or shelters into permanent or permanent supportive housing, and that assist persons with living successfully in housing.

**System Security** – Refers to security of the computer system itself. There are steps to take in order to protect persona information from those who are not authorized to have it. STEPS/HMIS uses several security measures.

**Transitional Housing** - A project that has its purpose facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months).

**Unduplicated Count** - The number of people who are homeless within a specified location and time period. An unduplicated count ensures that individuals are counted only once regardless of the number of times they entered or exited the homeless system or the number of programs in which they participated. Congress directed HUD to develop a strategy for data collection on homelessness so that an unduplicated count of the homeless at the local level could be produced.

**Universal Data Elements** - Data required to be collected from all clients serviced by homeless assistance programs using an HMIS. These data elements include date of birth, gender, race, ethnicity, veteran's status, and Social Security Number (SSN). These elements are needed for CoCs to understand the basic dynamics of homelessness in their community and for HUD to meet the Congressional directive.

**Virus** - A computer program that is loaded onto your computer without your knowledge and can use memory, destroy computers and can sneak past secure systems. These programs may enter the computer via email messages, files and/or web pages.

**Virus Protection or Anti-Virus Software** – A program that runs on your PC and/or computer networks to look for email messages, files or web pages that contain viruses. It prevents the virus loading on your PC or network. There are many free or low-cost anti-virus packages available.

**Written Consent** - Written consent embodies the element of informed consent in a written form. A client completes and signs a document consenting to an understanding of the options and risks of participating or sharing data in an HMIS system. The signed document is then kept on file at the agency.

