



Maine Homeless Management Information System (Maine HMIS)

Policies and Procedures Manual

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1 About this Manual

In 2004, the Department of Housing and Urban Development (HUD) put forth rules regarding requirements for recipients of HUD related funding and other providers of services for the homeless to collect electronic data on their homeless clients through the Homeless Management Information Systems (HMIS). The State of Maine Homeless Management Information System (Maine HMIS) is a collaborative effort between MaineHousing, the dedicated lead agency, and the Maine Continuum of Care (MCoC). The MCoC has an ongoing role in ensuring the success of Maine's HMIS by giving input into HMIS policy decisions within the parameters established by HUD.

This manual contains information and procedures related to the Maine HMIS. The purpose of this document is to provide for uniform technical requirements of HMIS, for proper collection of data and maintenance of the database, and to ensure the confidentiality of the information in the database. HMIS Governance Standards (§ 580.31)

The importance of the integrity and security of HMIS cannot be overstated. Given such importance, it is equally important that HMIS is administered and operated under high standards of data quality and security. To strive to meet these objectives, the HMIS Lead has adopted policies and procedures for the operation of its HMIS. These policies and procedures must not only meet HUD standards, but policies and procedures must meet applicable state or local governmental requirements.

In addition to the Policies and Procedures listed here, all Maine HMIS Participating Agencies must make themselves knowledgeable of, and adhere to, all of the requirements and directives outlined in the following documents, if applicable to their agency:

- The Agency Participation Agreement
- User Policy and Agreement
- The Maine HMIS Governance Model
- The Maine HMIS Data Quality Plan and Best Practices Guide;
- The HUD HMIS Data Standards Manual
<https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>);
- The HMIS Data Dictionary <https://files.hudexchange.info/resources/documents/HMIS-Data-Dictionary.pdf>);
- The HUD 12/09/2011 Proposed Rule of Homeless Management Information Systems Requirements (<https://www.federalregister.gov/documents/2011/12/09/2011-31634/homeless-management-information-systems-requirements>). Note: The mandates within the Final Rule of the Homeless Management Information System Requirements will need to be in place within six months of the rule being finalized.

Additional resources and information pertaining to Maine HMIS, and the above mentioned documents, can be found at <https://mainehmis.org>.

2 Roles and Responsibilities

2.1 Maine Continuum of Care (MCoC)

A MCoC is a group composed of representatives from organizations including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, participating agency districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve veterans, and homeless and formerly homeless persons organized to carry out the responsibilities of a Continuum of Care established under 24 CFR part 578.

The MCoC is responsible for ensuring that the HMIS for the MCoC is operated in accordance with any current regulations and applicable Federal, state, and local laws and ordinances.

CoCs can apply to HUD for McKinney-Vento funding. Local agencies wishing to access these funds must do so through their local MCoC's application for funding. HUD requires that every MCoC work together to implement a shared data system designed to provide an un-duplicated count of homeless individuals, provide information on the number of people who are homeless, related demographics, and their needs over time. In Maine, this work is accomplished by the MCoC. For additional information and detail please refer to www.mainehomelessplanning.org. This site assists with the year round planning process for the MCoC, the Point-in-Time (PIT) Count, System Performance Measures, and captures details about the outcomes of [Maine's Plan to End and Prevent Homelessness](#).

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91), the MCoC must:

(a) Designate a single information system as the official HMIS software for the geographic area. The software must comply with federal requirements.

(b) Designate an HMIS Lead, which may be itself, to operate the HMIS. The HMIS Lead must be a state or local government, an instrumentality of state or local government, or a private nonprofit organization.

(c) Develop a governance charter, which at a minimum includes:

(i) A requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Participating Agency requiring the Participating Agency to comply with this part and imposing sanctions for failure to comply;

(ii) The participation fee charged by the HMIS; and

(iii) Such additional requirements as may be issued by notice from time to time.

(d) Maintain documentation evidencing compliance with this part and with the governance charter; and

(e) Review, revise and approve the policies and plans (required by this part and by any notices issued from time to time).

MCoC Key responsibilities, as detailed in the Maine HMIS Governance Model, include:

- Ensures that activities related to HMIS growth and use are developed, reviewed regularly, and are in accordance with the MCoC's goals;
- Identifies general milestones for project management, including training, expanded system functionality, etc.;
- Ensures the HMIS generates other client served, utilization summary, and demographic reports both at the system and program levels for purposes of understanding the nature and extent of homelessness in the MCoC;
- Regularly monitors the HMIS Lead/Grantee on adherence to the agreement;
- Ensures membership of the Maine HMIS Data Committee is inclusive of decision makers representing the MCoC;
- Ensures that the HMIS is managed in accordance to MCoC policies, procedures, and goals;
- Regularly monitors program and agency-level participation in HMIS;
- Ensures participation in the NOFA (Notice of Funding Availability), LSA (Longitudinal System Analysis), PIT, and HIC (Housing Inventory Chart);
- Develops and enforces community level data quality plan and standards;
- Ensures the collection of each data variable and corresponding response categories on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating projects;
- Ensures the collection of each data variable and corresponding response categories specific to their program type on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating programs;
- Regularly reviews data quality reports at community planning level on data entry completion, consistency with program model, and timeliness as compared to the community data quality standards;
- Provides training and regularly reviews the progress of the Community Planning Goals and Objectives;
- Ensures the HMIS Lead has adopted a drug-free workplace policy. The policy is posted and available for review;
- Participation can include but is not limited to Advisory Council leadership, advisory committees, staff positions, and sub-committee positions;
- The HMIS Grantee has adopted a conflict of interest policy for board members, staff, and volunteers;
- The HMIS Grantee has adopted an equal opportunity and non-discrimination policy.

2.1.1 Maine HMIS Data Committee

The Maine HMIS Data Committee (Data Committee) is comprised of Participating Agencies, and the Lead Agency. The Data Committee reviews data analysis, systems mapping, the PIT, and other data-

related issues and topics within the MCoC. The Data Committee also oversees the quality of the data that is put into HMIS and is responsible for developing and implementing an ongoing data quality plan.

Key Maine HMIS Data Committee responsibilities, as detailed in the Maine HMIS Governance Model, include:

- Coordinate the resolution of data issues;
- Recommend community level data quality plans and standards;
- Recommends policy and procedures for Maine HMIS as it relates to the data, including software application, data elements to be collected, and intervals for data gathering;
- Consider the effectiveness, and what improvements can be made, to the intake process;
- Work with Participating Agencies to identify training needs to improve data quality;
- Review Participating Agency data quality reports for compliance with the data quality benchmarks;
- And provides regular data quality reports to the MCoC Board on the quality of the MCoC's data;
- Ensures that activities related to HMIS growth and use are developed, reviewed regularly, and are in accordance with the MCoC's goals;
- Identifies general milestones for project management, including training, expanded system functionality, etc.;
- Ensures an HMIS Governance Model is developed and formally documented between the HMIS Lead Agency/grantee and the community planning body(ies). Ensures that a formal agreement that outlines management processes, responsibilities, decision-making structures, and oversight of the HMIS projects has been executed;
- Manages and maintains mechanisms for soliciting, collecting, and analyzing feedback from end users, program managers, agency executive directors, and homeless persons. Feedback includes impressions of operational milestones and progress, system functionality, and general HMIS operations. Examples of feedback include satisfaction surveys, questionnaires, and focus groups;
- Ensures that the HMIS is managed in accordance to MCoC policies, procedures, and goals;
- Develops and enforces community level data quality plan and standards;
- Ensures the collection of each data variable and corresponding response categories on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating projects;
- Ensures the collection of each data variable and corresponding response categories specific to their program type on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating programs;
- Regularly reviews data quality reports at community planning level on data entry completion, consistency with program model, and timeliness as compared to the community data quality standards;
- Provides training and guidance on business practices to support MCoC and HMIS policies (MCoC-specific protocols, ethics, strategies for communication, etc.);
- Ensures the existence and use of HMIS Policies and Procedures;

- And ensures at least one homeless person or formerly homeless person participates in policymaking. Participation can include but is not limited to Advisory Council leadership, advisory committees, staff positions, and sub-committee positions.

2.2 Lead Agency

HMIS Lead means an entity designated by the MCoC to operate the Continuum's HMIS on its behalf.

HUD requires that every MCoC work together to implement a shared data system designed to provide an un-duplicated count of homeless individuals, information on the number of people who are homeless, related demographics, and their needs over time. The HMIS Lead works with the Participating Agencies to meet this goal. MaineHousing is the designated Lead Agency.

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:

- (a) Ensure the operation of and consistent participation by recipients of funds from the Emergency Solutions Grants Program and from the other programs authorized by Title IV of the McKinney-Vento Act. Duties include establishing the HMIS; conducting oversight of the HMIS; and taking corrective action, if needed, to ensure that the HMIS is compliant with the requirements of this part;
- (b) Develop written HMIS policies and procedures in accordance with § 580.31 for all Participating Agencies;
- (c) Execute a written HMIS Participation Agreement with each PARTICIPATING AGENCY, which includes the obligations and authority of the HMIS Lead and PARTICIPATING AGENCY, the requirements of the security plan with which the PARTICIPATING AGENCY must abide, the requirements of the privacy policy with which the PARTICIPATING AGENCY must abide, the sanctions for violating the HMIS Participation Agreement (e.g., imposing a financial penalty, requiring completion of standardized or specialized training, suspending or revoking user licenses, suspending or revoking system privileges, or pursuing criminal prosecution), and an agreement that the HMIS Lead and the PARTICIPATING AGENCY will process Protected Identifying Information consistent with the agreement. The HMIS Participation Agreement may address other activities to meet local needs;
- (d) Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Continuum of Care's geographic area, as directed by the Continuum, and, if selected for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved activities;
- (e) Monitor and enforce compliance by all Participating Agencies with the requirements of this part and report on compliance to the Continuum of Care and HUD;
- (f) The HMIS Lead must submit a security plan (see § 580.35), a data quality plan (see § 580.37), and a privacy policy (see § 580.31(g)) to the Continuum of Care for approval within [the date that is 6 months after the effective date of the final rule to be inserted at final rule stage] and within 6 months after the date that any change is made to the local HMIS. The HMIS Lead must review and update the plans and policy at least annually. During this process, the HMIS Lead must seek and incorporate feedback from

the Continuum of Care and Participating Agencies. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Continuum of Care.

According to the Proposed HMIS Requirements (24 CFR Part 91) only the HMIS Lead may carry out the following activities:

- (a) Host and maintain HMIS software or data;
- (b) Backup, recovery, and repair of the HMIS software or data;
- (c) Upgrade, customize, and enhance the HMIS;
- (d) Integrate and warehouse data, including development of a data warehouse for use in aggregating data from sub recipients using multiple software systems;
- (e) System administration;
- (f) Report to providers, the Continuum, and HUD;
- (g) Conduct training for recipients on the use of the system, including the reasonable cost of travel to the training; and
- (h) Such additional activities as may be authorized by HUD in notice.

Additionally noted in the Proposed HMIS rule:

- (a) An HMIS Lead must develop a privacy policy. At a minimum, the privacy policy must include data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault, and stalking; and such additional information and standards as may be established by HUD in notice.
- (b) Every organization with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including enforcement of sanctions for noncompliance.
- (c) An HMIS Lead or PARTICIPATING AGENCY that contracts with an HMIS vendor must, as part of its contract with an HMIS vendor, require the HMIS vendor and the software to comply with HMIS standards issued by HUD.

The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Continuum of Care.

Key Lead Agency Responsibilities as detailed in the Maine HMIS Governance Model:

- Ensures that activities related to HMIS growth and use are developed, reviewed regularly, and are in accordance with the MCoC's goals;
- Identifies general milestones for project management, including training, expanded system functionality, etc.;

- Ensures that the HMIS is able to manage the collection of each data element and corresponding response categories for the Universal Data Elements as outlined in the Current HMIS Data Standard;
- Ensures that the HMIS is able to manage the collection of each data variable and corresponding response categories for the Project-specific data elements as outlined in the Current HMIS Data Standard;
- Ensures the HMIS is able to generate a summary report of the number of unduplicated client records that have been entered into the HMIS;
- Ensures the HMIS is consistently able to produce a reliable required federal reports;
- Ensures the HMIS generates other client served, utilization summary, and demographic reports both at the system and program levels for purposes of understanding the nature and extent of homelessness in the MCoC;
- Provides technical expertise commensurate with the general HMIS program oversight; provides timely support on high level technical matters; reviews and authorizes HMIS software changes in response to the changing requirements of participating Agencies; and, generally reviews and authorizes special issues brought to it by participating Agencies;
- Provides technical expertise commensurate with the requirements of the HMIS software and/or system; provides timely support on software technical matters; is responsible for implementation of authorized changes to the HMIS software and processes; and, generally implements resolutions to any special issues authorized by the HMIS Technical Support Entity within the software and/or overall system;
- Maintains a regularly updated list of HMIS system service requests, activities, deliverables, and resolutions;
- Regularly reviews HMIS System service requests, activities, deliverables and resolutions. Provides authoritative support when necessary to expedite IT issue resolution;
- Maintains a current and accurate organization chart that clearly identifies all team members, roles and responsibilities, and general work activities/functions. Organization chart is available for review (see Appendix B: Organization Chart);
- Provides regular training on software usage, software and data security, and data entry techniques to participating Agencies. Develops, updates, and disseminates data entry tools and training materials, includes train the trainer. Monitors and ensures system and data security;
- Manages and maintains mechanisms for soliciting, collecting, and analyzing feedback from end users, program managers, agency executive directors, and homeless persons. Feedback includes impressions of operational milestones and progress, system functionality, and general HMIS operations. Examples of feedback include satisfaction surveys, questionnaires, and focus groups;
- Responsible for the day-to-day operation and maintains the HMIS System;
- Ensures that the HMIS is managed in accordance to MCoC policies, procedures, and goals;
- Regularly monitors program and agency-level participation in HMIS
- Ensures the completion and documentation of Maine's HMIS Authorization to Disclose Information as appropriate with the Maine's HMIS Authorization to Disclose Information policies and protocols;

- Ensures adherence by agency staff with the HMIS data and system security protocols as outlined by the MCoC and the Current HMIS Data Standard;
- Develops and enforces community level data quality plan and standards;
- Ensures the collection of each data variable and corresponding response categories on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating projects;
- Ensures the collection of each data variable and corresponding response categories specific to their program type on all clients served by HUD, other federally funded partners, the State of ME, and non-funded participating programs;
- Regularly runs and disseminates data quality reports to participating programs that indicate levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards;
- Provides technical assistance and training in response to data quality reports disseminated to participating programs that indicate levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality
- Regularly runs and disseminates data quality reports to the community planning entity that indicate cross program levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards;
- Regularly reviews data quality reports at community planning level on data entry completion, consistency with program model, and timeliness as compared to the community data quality standards;
- Provides regular training on client confidentiality and privacy requirements to intake staff, data entry staff and reporting staff at participating Agencies. Ensures all Agencies have sufficient privacy policies and protocols in place;
- Provides regular training and guidance on program performance measurement;
- Provides training and regularly reviews the progress of the Community Planning Goals and Objectives;
- Provides training and guidance on business practices to support MCoC and HMIS policies (MCoC-specific protocols, ethics, strategies for communication, etc.);
- Maintains documentation of the number of participating Agencies (utilizing the HMIS system) is up-to-date. A comparative analysis of planned versus actual deployments at the project level is highly desired but not compulsory;
- Provides regular reports on HMIS participation rates to MCoC Data Subcommittee. An analysis of agency-specific barriers with potential solutions is highly desired but not compulsory;
- Ensures the existence and use of HMIS Policies and Procedures;
- Ensures and maintains written agreements with participating Agencies that describes the protocols for participation in the HMIS;
- Ensures and maintains written agreements with participating Agencies who share client level data that describes the level of data element or program information sharing among the data sharing HMIS Agencies;

- Ensures and maintains a written agreement with each authorized user of the HMIS that defines participation protocols, including training criteria, consent protocols, system use, and privacy and security standards;
- Ensures that the MCoC has a defined and documented client Acknowledgement protocol for use as a baseline practice among all participating HMIS users;
- Ensures that the MCoC has a defined and documented HMIS data release protocol that governs release of all data from the HMIS;
- Ensures At least one homeless person or formerly homeless person participates in policymaking. Participation can include but is not limited to Advisory Council leadership, advisory committees, staff positions, and sub-committee positions.

2.3 Participating Agency

Participating Agencies are responsible for ensuring that HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data and the maintenance privacy, security, and confidentiality protections are in place for their individual programs and projects. A Participating Agency will include both an Agency Admin and End Users.

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the Participating Agency shall:

- (a)Purchase, lease, or license computer hardware and software;
- (b)Purchase or lease equipment, including telephones, faxes, and furniture;
- (c)Pay for technical support;
- (d)Lease office space;
- (e)Pay for electricity, gas, water, phone service, and high-speed data transmission costs necessary to operate and participate in the HMIS;
- (f)Pay salaries for operating HMIS,

Which includes:

- (i)Data entry;
- (ii)Monitor and review data quality;
- (iii)Data analysis;
- (iv)Report to the HMIS Lead;
- (v)Attend HUD-sponsored and HUD- approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Act;
- (vi)Conduct training for Participating Agency's on the HMIS or comparable database;

(vii) Travel to conduct intake and to attend training;

(viii) Implement and comply with HMIS requirements; and

(g) Pay the participation fee to the HMIS Lead that is established by the Continuum of Care in the governance

(h) If the Participating Agency is a victim services provider, as defined under 24 CFR 580.3, or a legal services provider, establish and operate a comparable database that complies with 24 CFR 580.25; and

(i) Such other activities as authorized by HUD in notice.

Key Participating Agency Responsibilities as detailed in the Maine HMIS Governance Model:

- Ensures the completion and documentation of Maine's HMIS Authorization to Disclose Information as appropriate with the Maine's HMIS Authorization to Disclose Information policies and protocols;
- Ensures adherence by agency staff with the HMIS data and system security protocols as outlined by the MCoC and the most recent version of HUD HMIS Data Standards;
- Ensures the collection of each data variable and corresponding response categories on all clients served by HUD, other federally funded partners, the State of Maine, and non-funded participating projects;
- Ensures the collection of each data variable and corresponding response categories specific to their program type on all clients served by HUD, other federally funded partners, the State of Maine, and non-funded participating programs;
- Regularly runs and disseminates data quality reports to participating programs that indicate levels of data entry completion, consistency with program model, and timeliness as compared to the Data Quality Plan and Best Practices Guide;
- Provides regular training on client confidentiality and privacy requirements to intake staff, data entry staff and reporting staff at participating Agencies. Ensures all Agencies have sufficient privacy policies and protocols in place;
- Ensures and maintains a written agreement with each authorized user of the HMIS that defines participation protocols, including training criteria, consent protocols, system use, and privacy and security standards;
- Ensures that the MCoC has a defined and documented client Acknowledgement protocol for use as a baseline practice among all participating HMIS users;
- Ensures that the MCoC has a defined and documented HMIS data release protocol that governs release of all data from the HMIS.

3 The Maine HMIS Participation Policy

3.1 Participation Requirements

Participation in HMIS. The recipient must ensure that data on all persons served and all activities assisted under ESG are entered into the applicable HMIS for the geographic area in which those persons and activities are located, or a comparable database, as provided under 24 CFR part 580. The entry, storage, and use of this data are subject to the HMIS requirements at 24 CFR part 580.

3.1.1 Mandated Participation

All designated agencies that are funded to provide homeless services by MaineHousing, State of Maine Department of Health and Human Services (DHHS), Office of Child and Family Services (OFCS), Runaway and Homeless Youth (RHY), Projects for Assistance in Transition from Homelessness (PATH), Supportive Services for Veteran Families (SSVF), Veterans Affairs Supportive Housing (VASH) and/or HUD in the State of Maine, must meet the minimum Maine HMIS participation standards as defined by this Policy and Procedures Manual. The proposed HUD Rule found at 24 CFR Parts 91, detailing HMIS Requirements states; “With respect to scope, this rule clarifies that all recipients of financial assistance under the Continuum of Care program, the Emergency Solutions Grant program, the Rural Housing Stability Assistance (RHS) program, as well as HUD programs previously funded under the McKinney-Vento Act (the Supportive Housing Program, the Shelter Plus Care program, and the Section 8 Single Room Occupancy Moderate Rehabilitation program) are required to use HMIS to collect client- level data on persons served.” Or for *victims service providers* a comparable database is to be used. A comparable database must have the ability to collect client-level data over time and generates unduplicated aggregate reports based on the data.

3.1.2 Voluntary Participation

The MCoC cannot require non-funded providers to participate in the Maine HMIS, however, they do work closely with non-funded agencies to articulate the benefits of HMIS, and to strongly encourage their participation. Full participation in the Maine HMIS ensures a comprehensive and accurate understanding of homelessness in the State of Maine. Non-funded agencies may voluntarily agree to participate but will need to meet minimum participation standards.

3.2 Participating Agency Standards

Participating Agencies are responsible for ensuring that a minimum set of data elements, referred to as the HUD Universal Data Elements (UDEs) as defined by the most current HUD HMIS Data Standards, are collected and/or verified from all clients at their initial program enrollment, or as soon as possible thereafter (with the exception of those serving domestic violence victims). Participating Agencies must report client-level detail in the “Required Response Categories” for the UDE’s that are shown in the most current HUD HMIS Data Standards.

HUD Universal Data Elements		
Name	Social Security Number	Date of Birth
Race	Ethnicity	Gender
Veteran Status	Disabling Condition	Project Start Date
Project Exit Date	Destination	Relationship to Head of Household
Client Location	Housing Move-In Date	Living Situation

A separate set of Program-Specific Data Elements for client level data are required for all programs funded by State or Federal programs, including but not limited to SSVF, VASH, OFCS, DHHS, PATH, RHY, and ESHAP. These elements are defined by the most current HUD HMIS Data Standards and are collected from all clients that are served by applicable HUD-funded programs.

HUD APR Program-Specific Data Elements	
Income and Sources	Substance Abuse
Non-Cash Benefits	Domestic Violence
Physical Disability	Services Received
Developmental Disability	HIV / AIDS
Reason for leaving	Mental Health

These standards are already incorporated into the Maine HMIS, and can be accessed from the Maine HMIS website at: <https://mainehmis.org/>. Data entry must be completed within a specific timeframe, depending on the type of program (see the attached Data Quality Plan and Best Practices Guide). The Maine HMIS uses all submitted data for analytic and administrative purposes, including the preparation of all Federal and State required reports.

3.2.1 Authorized Agency Users/ End Users

- Authorized Agency Users, also referred to as End Users, must enter client-level data directly into the HMIS database. End Users have rights to access data for clients served by their Agency and use the HMIS functionality based on their user level privileges. The Agency's data is stored in the HMIS central database server, which is protected by several levels of security to prevent access from unauthorized users;
- An End User has an active license to HMIS and uses ServicePoint as their primary tool for client intake, and reporting. An End User is expected to do the following:
 - Adhere to all of the policy and procedures outlined in the Maine HMIS Policies & Procedures;

- At intake, gather the most complete and accurate information about each client and the services they need according to the workflow provided at HMIS training;
- **Enter quality client data into HMIS in a timely and accurate manner and using the appropriate required work flow;**
- Adhere to the data requirements set by the HMIS Team and the HMIS Participating Agency;
- After HMIS training, pass the certification test with a score of 80% or better;
- Meet and follow the expectations of the Agency Admins;
- Regularly reviews data quality reports at community planning level on data entry completion, consistency with program model, and timeliness as compared to the community data quality standards;
- At intake, gather the most complete and accurate information about each client and the services they need according to the workflow provided at HMIS training.

3.2.2 Agency Administrator

Each Agency must designate at least one Agency Administrator (Agency Admin) who is the point person and specialist regarding the Maine HMIS for their agency. Some of the key roles of the Agency Admin are:

- Running HUD Universal Data Elements, Data Incongruities Reports, and other data quality reports in ART at least monthly and upon request of the Maine HMIS Team and/or the MCoC to check client data;
- Completing the Agency Administrator training;
- Informing the Maine HMIS Team of all program changes at least 5 business days prior to the change.
- Communicate and authorize personnel and security changes for End Users to the Maine HMIS Team immediately of a change; inactivating end users account when an End User leaves the agency;
- Ensure that end-users are using the correct HMIS-related forms and are following the most current Maine HMIS procedures and workflow;
- Correct any data quality issues as soon as possible and notify the Maine HMIS Team of findings and timelines for correction;
- Provide technical support by troubleshooting data and escalating unresolved issues to the Maine HMIS Team;
- Review and update HIC information in the HMIS annually;
- Attend the Maine HMIS-required meetings and conference calls;
- Resetting End Users accounts when they are locked out;
- Adhere to all of the policy and procedures outlined in the Maine HMIS Policies & Procedures.

4 Hardware, Connectivity and Computer Security Requirements

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:

4.1 Technical Standards

§ 580.33 HMIS technical standards.

- (a) In general, HMIS Leads and HMIS vendors are jointly responsible for ensuring compliance with the technical standards applicable to HMIS, as provided in this document and any supplemental notices, and for addressing any identified system or operating deficiencies promptly. Grant funds must be used only for software that meets the requirements of this part.
- (b) Required functionality. The HMIS must meet all required functionality established by HUD in notice.
- (c) Un-duplication requirements. An HMIS must be capable of un-duplicating client records as established by HUD in notice.
- (d) Data collection requirements.
 - (i) Collection of all data elements. An HMIS must contain fields for collection of all data elements established by HUD in notice. For fields that contain response categories, the response categories in the HMIS must either directly match or map to the response categories defined by HUD.
 - (ii) Maintaining historical data. An HMIS must be able to record data from a theoretically limitless number of service transactions and historical observations for data analysis over time and assessment of client outcomes, while following Federal, state, territorial, or local data retention laws and ordinances.
- (e) Reporting requirements.
 - (i) Standard HUD reports. An HMIS must be able to generate the report outputs specified by HUD. The reporting feature must be able to represent dates in the past for all historical and transactional data elements.
 - (ii) Data quality reports. An HMIS must be capable of producing reports that enable the PARTICIPATING AGENCYs and the HMIS Lead to assess compliance with local data quality benchmarks and any HUD- established data quality benchmarks.
 - (iii) Audit reports. An HMIS must be capable of generating audit reports to allow the HMIS Lead to review the audit logs on demand, including minimum data requirements established by HUD in notice.

4.2 Workstation Specifications

4.2.1 Monitor

Screen Display - 1024 x 768 (XGA)

4.2.2 Processor

A Dual-Core processor is recommended. Avoid machines with single core processors, which are usually much older computers.

4.2.3 Browser

ServicePoint is designed to be compatible with the newest versions of Google Chrome, Mozilla Firefox, and Apple Safari

Browser Performance: In the context of ServicePoint 5, there are three factors that outweigh all others: data transfer efficiency, memory management, and machine speed.

4.2.4 Memory Management

Some browsers handle memory differently than others. The best practice for determining the best browser is to see if you experience any of the following issues.

Effects of poor memory management:

Your overall system performance may degrade.

Your browser may suddenly seem to completely stop working. Blank pages may appear or certain page components won't work.

Your browser may run more and more slowly.

What to do:

If you suspect that you may have poor browser memory management, try updating your browser to a more recent version before switching to a different brand of browser. More than likely, any major issue will have been fixed with a more current release. If you still have issues, try switching to one of the other 3 major browsers. If you need help updating your browser, contact your IT Department.

4.2.5 Machine Speed

Avoid machines with single core processors, which are usually much older computers. If your computer is a single-core machine operating at less than 2 GHZ, and you are not content with its performance:

Switch to one of the fastest browsers. Chrome is recommended, Firefox is a good alternate; Internet Explorer versions 8, 9 and 10 are acceptable (see below for information regarding Internet Explorer version 11).

Run no unnecessary programs while using ServicePoint.

Monitor your CPU usage in Task Manager. If it is frequently at 100%, you need a more capable machine.

Think about getting more RAM. But before you buy enough RAM to max out your computer, consider replacing your old computer with a new or used dual-core machine. Even an old dual core tends to outperform a fully-upgraded, single-core in ServicePoint 5. Buying a used computer may actually cost less than buying a gigabyte or two of obsolete RAM for an older machine.

4.2.6 Art Users

ART only supports Java 7 release 7 (32 bit). Any higher versions of Java are not currently supported. We do not recommend the 64 bit version of Java because Chrome is a 32 bit only browser and the 64 bit version of Java does not function in Chrome.

4.2.7 Internet Connectivity

Participating Program must have Internet connectivity for each workstation accessing the HMIS. To optimize performance, all agencies are encouraged to secure a high speed Internet connection with a cable modem, DSL, FiOS, or T1 line.

4.2.8 Security Hardware/Software

All workstations accessing the HMIS need to be protected by a Firewall. If the workstations are part of an Agency computer network, the Firewall may be installed at a point between the network and the Internet or other systems rather than at each workstation. Each workstation also needs to have anti-virus and anti-spyware programs in use and properly maintained with automatic installation of all critical software updates.

Good examples of anti-virus software include McAfee and Symantec (Norton) Security systems, among others.

4.2.9 Agency Workstation Access Control

Access to the HMIS will be allowed only from computers specifically identified by the Participating Agency's Executive Director or authorized designee and The HMIS Agency Administrator. Laptop computers will require an additional security statement indicating that they will not be used for unauthorized purposes from unauthorized locations. Access to these workstations will be controlled through both physical security measures and a password. Each Agency's HMIS Agency Administrator will determine the physical access controls appropriate for their organizational setting based on the HMIS security policies, standards and guidelines.

Each workstation, including laptops used off-site, should have appropriate and current firewall, and virus protection as specified above, see *Section 6.1.8 Security Hardware/Software*. Devices must only access secured, password-protected Wi-Fi with non-public access.

4.2.9.1 Access to Maine HMIS ServicePoint from an authorized Home Office

MaineHousing and other participants in the Maine HMIS who have written and enforced work-at-home policies may authorize home office locations as authorized agency location for Maine HMIS ServicePoint use given the home office location is structured to assure that viewing of client

information by unauthorized persons does not happen. A signed copy of work at home authorization and the related work at home policy should be on file at the MaineHousing HMIS office for anyone who works with ServicePoint from a home office setting.

5 The Maine HMIS Training Requirements

5.1 Eligible Users

Each Participating Agency shall authorize use of the HMIS only to users who need access to the system for data entry, editing of client records, viewing of client records, report writing, administration or other essential activity associated with carrying out Participant Agency responsibilities.

5.1.1 Setting up a New HMIS End User

It is the responsibility of the Agency Administrator to contact the HMIS Team when a new user starts and access to the HMIS and related training is required.

The agency will email an “HMIS User Agreement” form to the HMIS Help Desk at HMIShelp@mainehousing.org, requesting access to the HMIS/ServicePoint. The Help Desk will acknowledge receiving the “HMIS User Agreement” that can be found here: <https://mainehmis.org/training>.

5.1.1.1 New End User Training Requirements

All Agency Admins and End Users will be trained, either in person, or using the online Learning Management System (LMS), Bridge. For each training course, End Users will be required to pass the associated quiz. When the Maine HMIS verifies the End User has passed the test (with a grade of 80% or higher), their HMIS account will be set up and the End User will receive a ‘Welcome to Maine HMIS?’ email with further instructions to obtain their HMIS credentials so they can access ServicePoint.

The HMIS Lead Agency shall authorize use of the HMIS only to End Users who need access to the system for technical administration of the system, report writing, data analysis and report generation, back-up administration or other essential activity associated with carrying out central server responsibilities.

The HMIS Help Desk will assist in enrolling in Bridge. Bridge is the LMS the Maine HMIS will be using for online new user and program specific trainings found at <https://mainehousing.bridgeapp.com>. Agencies should be aware that Bridge emails may be filtered to spam or junk folders.

5.2 Agency Administrator Training

After completing End User training, each new Agency Administrator must complete an additional Admin training session. This session will include how to configure and manage an Agency’s programs and users in the HMIS. Agency Administrators will participate in subsequent training sessions as

designated by the Maine HMIS Lead Agency, such as running the MCoC APR, LSA, HIC, CAPER and/or other project reports.

5.3 Reports Training

Reports training for Agency Administrators and other interested users will be made available as needed. This training will include how to use existing canned reports in ServicePoint and also include opportunities for training on the Advanced Reporting Tool (ART).

The Maine HMIS Team strongly encourages Participating Agencies to run their own data quality reports and APR report monthly so that Participating Agencies can monitor their own data quality and become more effective in serving clients across the Continuum.

5.3.1 Agency Admins & End User Requirements

Prior to being trained and granted a username and password, users must sign the HMIS User Policy Agreement. This agreement acknowledges receipt of a copy of as well as a pledge to comply with the Agency's Privacy Notice.

Agency Admins and End Users must be aware of the sensitivity of client-level data and must take appropriate measures to prevent its unauthorized disclosure. Administrators and End Users are responsible for protecting institutional information to which they have access and for reporting security violations.

Agency Admins and End Users must comply with all policies and standards described in the following documents:

- The Agency Participation Agreement;
- User Policy and Agreement;
- The Maine HMIS Governance Model;
- The Maine HMIS Data Quality Plan and Best Practices Guide;
- HUD HMIS Data Standards Manual

Users are accountable for their actions and for any actions undertaken with their username and password.

Agency Admins must ensure that users have received adequate training prior to being given access to the HMIS database. If any user leaves the Agency or no longer needs access to the HMIS, the Agency Administrator is responsible for ***immediately notifying the HMIS Team at HMIShelp@mainehousing.org*** so that the user's access can be terminated.

Volunteers have the same user requirements as paid staff. They must have an individual user account, go through the same training, and have the same confidentiality and privacy documents signed and on file with the Participating Agency they are serving.

The Executive Director or authorized designee is responsible for ensuring that the Agency Admin and End Users understands and complies with all applicable HMIS policies and procedures.

5.3.2 User Licenses

User licenses are provided to Participant Agencies as determined by the Lead Agency.

6 The HMIS Agency Implementation

6.1 Setting up a New HMIS Agency

If your agency would like to participate in the Maine HMIS, the Agency Participation Agreement is the first form you will need to complete. The agreement covers the areas of: terms of use, training and technical assistance, confidentiality, security, and access to data. This agreement should be signed by an official who is authorized to enter into contractual agreements on your agency's behalf.

After your agency has agreed to participate in Maine HMIS you will need to complete the HMIS Agency Information Form. This form tells us about the types of housing and services that your agency provides as well as contact information. You will also need to complete the Agency Administrator Agreement, these will assist the Maine HMIS administrators when configuring your agency in HMIS.

Your agency will also need to complete a Maine Annual Homeless Housing Inventory Form. Once your agency is set up in HMIS, all users must read, acknowledge and sign the HMIS Service Point User Policy, Responsibilities Statement, Code of Ethics and Request for Training before they are allowed access to the HMIS system. In addition to the signed form, assigned training courses must be completed.

It is recommended that agencies retain a copy of this Maine HMIS Policies and Procedures Manual for reference. Prior to setting up a new Participant Agency within the Maine HMIS database, the Maine HMIS Lead Agency will:

Verify that the required documentation has been correctly executed and submitted or viewed on site, including:

- Agency Participation Agreement
- HMIS Agency Information Form
- Maine Annual Homeless Housing Inventory Form
- HMIS Service Point User Policy, Responsibilities Statement, Code of Ethics and Request for Training
- Maine HMIS Policies and Procedures Manual
- Maine HMIS Governance Model document
- HMIS Agency Administrator Agreement

Follow the HMIS naming conventions (Agency name: Project).

6.2 Enforcement Mechanisms

The Lead Agency will investigate all potential violations of any security protocols. Any Agency Admin or End User found to be in violation of security protocols will be sanctioned.

Sanctions may include, but are not limited to:

- A formal letter of reprimand to the MaineHousing Security Compliance Auditor, MCoC Board, and the Agency Executive Director;
- Suspension or Revocation of Agency Access if serious or repeated violation(s) of Maine HMIS Policies and Procedures occur by Agency Admins and/or End Users.

6.3 Agency Information Security Protocol Requirements

At a minimum, Participating Agencies must develop rules, protocols or procedures to address the following:

- Policies in the event of a HIPPA breach;
- Internal Agency procedures for complying with the HMIS confidentiality and security requirements and provisions of other HMIS client and Agency agreements;
- Posting a sign in the areas of client intake that explains generally the reasons; for collecting personal information; Appropriate assignment of user accounts;
- Preventing user account sharing;
- Protection of unattended workstations;
- Protection of physical access to workstations where employees are accessing the HMIS;
- Safe storage and protected access to hardcopy and digitally generated client records and reports with identifiable client information;
- Proper cleansing of equipment prior to transfer or disposal (i.e. disk shredding);
- Procedures for regularly auditing compliance with the Participating Agency's information security protocol.

NOTE: If an Agency is not in compliance with these protocols, they risk losing funding.

6.4 User Access Levels

All the HMIS users must be assigned a designated user access level that controls the level and type of access the user will have within the system. Each user will only have access to client-level data that is collected by their own Agency unless they participate in Data Sharing.

6.5 Security Standards

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:

580.35 HMIS security standards.

(a) In general. Security standards, as provided in this section, are directed to ensure the confidentiality, integrity, and availability of all HMIS information; protect against any reasonably anticipated threats or

hazards to security; and ensure compliance by end users. Written policies and procedures must comply with all applicable Federal law and regulations, and applicable state or local governmental requirements.

(b) System applicability. All HMIS Leads, Participating Agencies, and HMIS vendors must follow the security standards established by HUD in notice.

(c) Security management.

(i) Security plan. All HMIS Leads must develop a HMIS security plan, which meets the minimum requirements for a security plan as established by HUD in notice, and which must be approved by the Continuum of Care.

(ii) Timeline for implementation. The HMIS Lead must submit the security plan to the Continuum of Care for approval within 6 months of [effective date of final rule to be inserted at final rule stage]. The HMIS Lead and Participating Agency's must implement all administrative, physical, and technical safeguards within 6 months of the initial approval of the security plan. If one or more of these standards cannot be implemented, the HMIS Lead must justify the implementation delay and produce a plan of action for mitigating the shortfall, and develop milestones to eliminate the shortfall over time.

(d) Administrative safeguards. The administrative actions, policies, and procedures required to manage the selection, development, implementation, and maintenance of security measures to protect HMIS information must, at a minimum, meet the following:

(e) Security officer. Each HMIS Lead and each Participating Agency must designate an HMIS security officer to be responsible for ensuring compliance with applicable security standards. The HMIS Lead must designate one staff member as the HMIS security officer.

(f) Workforce security. The HMIS Lead must ensure that each Participating Agency conduct criminal background checks on the HMIS security officer and on all administrative users. Unless otherwise required by HUD, background checks may be conducted only once for administrative users.

(g) Security awareness training and follow-up. The HMIS Lead must ensure that all users receive security training prior to being given access to the HMIS, and that the training curriculum reflects the policies of the Continuum of Care and the requirements of this part. HMIS security training is required at least annually.

(h) Reporting security incidents. Each HMIS Lead must implement a policy and chain of communication for reporting and responding to security incidents, including a HUD-determined predefined threshold when reporting is mandatory, as established by HUD in notice.

(i) Disaster recovery plan. The HMIS Lead must develop a disaster recovery plan, which must include at a minimum, protocols for communication with staff, the Continuum of Care, and Participating Agencies and other requirements established by HUD in notice.

(j) Annual security review. Each HMIS Lead must complete an annual security review to ensure the implementation of the security requirements for itself and Participating Agencies. This security review

must include completion of a security checklist ensuring that each of the security standards is implemented in accordance with the HMIS security plan.

(k) Contracts and other arrangements. The HMIS Lead must retain copies of all contracts and agreements executed as part of the administration and management of the HMIS or required to comply with the requirements of this part.

(l) Physical safeguards. The HMIS Lead must implement physical measures, policies, and procedures to protect the HMIS.

(m) Technical safeguards. The HMIS Lead must implement security standards establishing the technology that protects and controls access to protected electronic HMIS information, and outline the policy and procedures for its use.

6.6 Data Quality Standards

§ 580.37 Data quality standards and management.

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:

(a) In general. The data quality standards ensure the completeness, accuracy, and consistency of the data in the HMIS. The Continuum of Care is responsible for the quality of the data produced.

(b) Definitions. For the purpose of this section, the term:

(i) HMIS participating bed means a bed on which required information is collected in an HMIS and is disclosed at least once annually to the HMIS Lead in accordance with the requirements of this part.

(ii) Lodging project means a project that provides overnight accommodations.

(iii) Non-lodging project means a project that does not provide overnight accommodations.

(c) Data quality benchmarks. HMIS Leads must set data quality benchmarks for Participating Agencies. Benchmarks must include separate benchmarks for lodging and non-lodging projects. HMIS Leads must establish data quality benchmarks, including minimum bed coverage rates and service-volume coverage rates, for the Continuum(s) of Care. HMIS Leads may establish different benchmarks for different types of projects (e.g., emergency shelter projects, permanent housing projects) based on population.

(i) For the purpose of data quality, the bed coverage rate measures the level of lodging project providers' participation in a Continuum of Care's HMIS.

(ii) The bed coverage rate is calculated by dividing the number of HMIS participating by the total number of year-round beds in the geographic area covered by the Continuum of Care.

(iii) Bed coverage rates must be calculated separately for emergency shelter, safe haven, transitional housing, and permanent housing.

- (iv) Bed coverage rates must be calculated for each comparable database.
- (d) For the purpose of data quality, the service-volume coverage rate measures the level of non-lodging project participation in a Continuum of Care's HMIS.
 - (i) Service-volume coverage is calculated for each HUD-defined category of dedicated homeless non-lodging projects, such as street outreach projects, based on population.
 - (ii) The service-volume coverage rate is equal to the number of persons served annually by the projects that participate in the HMIS divided by the number of persons served annually by all Continuum of Care projects within the HUD-defined category.
 - (iii) Service-volume rates must be calculated for each comparable database.
- (e) Data quality management. (1) Data quality plan. All HMIS Leads must develop and implement a data quality plan, as established by HUD in notice.
- (f) The HMIS must be capable of producing reports required by HUD to assist HMIS Leads in monitoring data quality.

6.7 Maintaining and Archiving

To be in compliance with the Proposed HMIS Requirements (24 CFR Part 91) the HMIS Lead shall:

580.41 Maintaining and archiving data.

- (a) Maintaining data. Applicable program regulations establish the length of time that records must be maintained for inspection and monitoring to determine that the recipient has met the requirements of the program regulations.
- (b) Archiving data. Archiving data means the removal of data from an active transactional database for storage in another database for historical, analytical, and reporting purposes. The HMIS Lead must follow archiving data standards established by HUD in notice, as well as any applicable Federal, state, territorial, local, or data retention laws or ordinances.

7 HMIS Client Data Policies and Procedures

7.1 Client Notification Policies and Procedures

The Maine HMIS and the MCoC have prepared standard documents for the HMIS release of information: the Maine HMIS Authorization for Disclosure Information Form. All written consent forms must be stored in a client's file for record keeping and auditing purposes. Forms are located on the HMIS website <https://maineHMIS.org/>

By participating in the Maine HMIS, agencies and users agree to high standards of confidentiality and to seek explicit authority and permission from clients for release of any identifiable client information.

The client has the right to have access to their own data.

A Release of Information form must be signed by a client (even to low-barrier shelters) before any protected personal information can be shared.

The signed copy of the Agency Participation Agreement will have to be in place and on file at MaineHousing prior to sharing of information across agencies within the Maine HMIS.

All agencies participating in the Maine HMIS will be required to follow all current data security practices detailed in this document, and adhere to ethical data use standards, regardless of the location where agency users connect to the HMIS.

The client will have access to view, or keep a printed copy of, his or her own records contained in the HMIS.

The participating agencies and MaineHousing reserve the right, granted under federal and state statutes, to charge a fee to cover reasonable costs for the retrieval and printing of such client information.

A privacy notice shall be prominently displayed in the program offices where intake occurs. The content of this privacy notice shall be in accordance with the HMIS Privacy Standards in: Federal Register / Vol. 69, No. 146 / Friday, July 30, 2004 and any other applicable standards.

7.2 Accountability for the Maine HMIS Policy

Participating Agencies must establish a regular process of training users on the Maine HMIS policies and procedures outlined in this manual, regularly auditing that the policy is being followed by Agency staff (including employees, volunteers, affiliates, contractors and associates), and receiving and reviewing complaints about potential violations of the policy.

7.3 HMIS Data Quality Policies and Procedures

The Maine HMIS has prepared the following data quality document that outlines the data quality policies and procedures, Maine Data Quality Plan and Best Practices Guide this document is available at <https://mainehmis.org>.

8 The HMIS Data Access Control Policies

8.1 User Accounts

Agency Administrators are responsible for managing user accounts for their Agency. They must follow the procedures documented in *Section 3*, for user account set-up including verification of eligibility, the appropriate training, and the establishment of appropriate user type. The assigned user type will

determine each user's individual access level to data, and Agency Administrators must regularly review user access privileges.

The Agency Administrator is responsible for inactivating users in the system. They should deactivate the user immediately upon that user's departure from any position with access to the HMIS. Agency Administrators are required to notify the HMIS team immediately upon inactivation.

8.2 User Passwords

Each user will be assigned a unique identification code (User ID), preferably the first initial and last name of the user.

A temporary password will be automatically generated by the system when a new user is created. The Maine HMIS Lead Agency will communicate the system-generated password to the user. The user will be required to establish a new password upon their initial login. This password will need to be changed every 45 days. A password cannot be used again until another password has expired. Passwords should be between 8 and 50 characters long, contain at least two numbers, and should not be easily guessed or found in a dictionary. The password format is alphanumeric and is case-sensitive. Users are prohibited from sharing passwords, even with supervisors.

8.3 Password Reset

Users are able to reset their own passwords using the “Forgot Password” link on the ServicePoint logon page. The Agency Administrator and the Maine HMIS Lead Agency have the ability to temporarily reset a password. If an Agency Administrator needs to have his/her password set, they will need to email the HMIS Lead at HMIShelp@mainehousing.org.

8.4 System Inactivity

Users must log off from the HMIS application and their workstation if they leave their workstation. Also, HUD requires password-protected screen-savers on each workstation. If the user is logged onto a workstation and the period of inactivity on that workstation exceeds 30 minutes, the user will be logged off the system automatically.

8.5 Unsuccessful Login

If a user unsuccessfully attempts to log in three times, the User ID will be “locked out”, their access permission will be revoked. They will be unable to regain access until their User ID is reactivated by the Agency Administrator or Maine HMIS Lead Agency. They will need to email the HMIS Lead at HMIShelp@mainehousing.org.

9 The HMIS Data Ownership Policies

The client has the right to view and have corrections made on their own data. In the event that the relationship between the Maine HMIS and a Participating Agency is terminated, Participating Agency

access is terminated. If another program is assuming the program administration then the data migrates to the new program (fees may apply).

9.1 The HMIS Data Use and Disclosure Policies and Procedures

Each of the HMIS Participating Agencies must comply with use and disclosure standards, as outlined in the *HUD HMIS Data Standards Manual*. The most current HUD data standards document can be found on the Maine HMIS website <https://mainehmis.org/>.

9.1.1 Data Release Criteria

The HMIS client data will be released only in aggregate, for any purpose beyond those specified in *Section 12 (c) THE HMIS Data Use and Disclosure Policies and Procedures*, according to the criteria specified below.

9.1.2 Aggregate Data Release Criteria

All released data must be anonymous, either by removal of all identifiers and/or all information that could be used to infer an individual or household identity.

10 The HMIS Technical Support Policies and Procedures

10.1 The HMIS Application Support

As unanticipated technical support questions on the use of the HMIS application arise, users will follow these procedures to resolve those questions:

- Assistance is available during the normal Maine HMIS business hours: (8:00-4:00);
- Review the on-line help in ServicePoint and/or training materials on the HMIS website at <https://mainehmis.org/>;
- Direct the technical support question to the Agency Administrator;
- If the question is still unresolved, the Agency Administrator/user can direct the question to the Maine HMIS Team by sending an email to HMIShelp@mainehousing.org;
- After the normal Maine HMIS business hours:
 - Review the on-line help in ServicePoint and/or training materials on the HMIS website at <https://mainehmis.org/>;
 - If the question can wait to be addressed during the following business day, wait and follow the normal business hours procedure outlined above;
 - If the question cannot wait, direct the technical support question to the Agency Administrator, if available.

10.2 The HMIS System Availability Policies

The Maine HMIS ServicePoint portal will be available to participating agencies 24 hours a day, 7 days a week. In the case there is a planned outage or issues impacting availability, users will be notified through <https://mainhmis.org/> in advance, if possible.

Every Wednesday from 10:00PM-11:00PM Eastern (EST) time, ServicePoint is unavailable because WellSky is performing necessary backup and maintenance of the HMIS database when as few people as possible need access to the system. However, when the Maine HMIS receives notice of a planned interruption of service for other reasons or for an abnormal amount of time, the HMIS Lead Agency will notify Agency Administrators and End-Users via email. If there is an unplanned interruption to service, the Maine HMIS System Administrator will communicate with WellSky, and Agency Administrators will be notified of any information regarding the interruption as it is made available.

If you have any questions about policies and procedures, contact the HMIS Lead or your MCoC Data Committee.

10.3 Standards for a Comparable Database

(a) Standards for a comparable database.

- (i) The comparable database must meet the standards of this part and comply with all HMIS data information, security, and processing standards, as established by HUD in notice.
- (ii) The comparable database must meet the standards for security, data quality, and privacy of the HMIS within the Continuum of Care. The comparable database may use more stringent standards than the Continuum of Care's HMIS.

(b) Victim service providers and legal service providers may suppress aggregate data on specific client characteristics if the characteristics meet the requirements of this part and any conditions as may be established by HUD in notice.

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