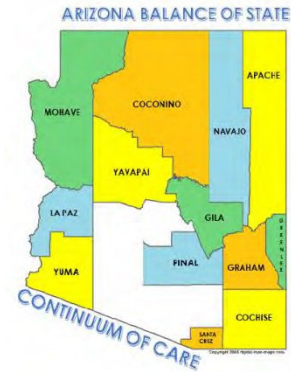




Arizona Department of Housing

Collaborative Applicant and Unified Funding Agency



Arizona Balance of State Continuum of Care HMIS Policies & Procedures

Revised by the HMIS Committee February 14, 2024

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I. BACKGROUND AND PURPOSE

A. Vision Statement

The vision of Arizona Balance of State Continuum of Care Homeless Management Information System (AZBOSCOC HMIS) is to operate a user-friendly data collection system that produces timely, accurate, and complete information for participants to use, ensuring the effective delivery of housing and services to end homelessness in Arizona.

B. Introduction

In the late 1990's, Congress mandated that States collect data regarding homeless populations as a condition to receive federal funds to serve that population. The U.S. Department of Housing and Urban Development (HUD) then mandated that each Continuum of Care (CoC) for the homeless must implement an HMIS, but they did not require any particular application. The AZBOSCOC Homeless Management Information System (AZBOSCOC HMIS) was instituted as a result of that mandate. AZBOSCOC HMIS' goal is to support the AZBOSCOC partner agencies in their mission of ending homelessness, by supplying them with the tools to meet the reporting requirements for their projects.

The AZBOSCOC HMIS is a client information database that provides a standardized assessment of client needs and records the use of housing and services used to meet those needs. The fundamental goal of the AZBOSCOC HMIS is to use the data to determine the utilization of services of Participating Agencies, identify gaps in the local service continuum, and develop outcome measurements according to the HUD/AZBOSCOC HMIS standards. The AZBOSCOC HMIS can identify patterns in the utilization of assistance, as well as document the effectiveness of services for clients.

All this will be accomplished through data analysis of the actual experiences of persons experiencing homelessness, as well as the service providers who assist them in shelters and homeless assistance projects throughout the state. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, service providers, advocates, researchers, and other representatives. Statewide reporting is based on aggregate, non-identifying data; therefore, such data may be shared by the Arizona Department of Housing (ADOH) and AZBOSCOC with the public without specific permission.

The AZBOSCOC HMIS uses a web-based software application owned and supported by WellSky commonly known as ServicePoint. The information contained in AZBOSCOC HMIS resides on a central server to facilitate data collection by homeless service organizations across the state. Access to the AZBOSCOC HMIS is limited to agencies that have entered into a partnership agreement with ADOH as the HMIS lead agency. Those agencies and their authorized staff members who have met the necessary training requirements and have signed the necessary privacy, security, and licensing documentation as listed in this manual will have full access to the database. As the guardians entrusted with personal data, agencies have both a moral and a legal obligation to ensure that data is being collected, accessed,

and used appropriately. All agencies must be vigilant to maintain client confidentiality, treating the personal data of Arizona's most vulnerable populations with the utmost respect.

Every project that receives federal homeless project funds from HUD is required to enter data on persons served with those funds into the AZBOSCOG HMIS. Some projects funded through the U.S. Veterans Administration (VA) and the U.S. Department of Health and Human Services (HHS) may be required to enter data into the AZBOSCOG HMIS, as well. In addition, AZBOSCOG encourages agencies that do not receive federal funds to participate in the AZBOSCOG HMIS so that service provision in the AZBOSCOG is coordinated and that data represents the broader network of service provision in the continuum.

The HUD HMIS Data Standards also require organizations to comply with CoC Program Interim Rule 24 CFR 578 and any federal, state, and local laws that require additional confidentiality protections.

As these data standards are subject to change, all providers are responsible for monitoring updates and being in constant compliance with all data standards.

C. Terminology

Many of the terms used in the AZBOSCOG HMIS Policies and Procedures Manual may be new to many readers. It is important to understand the terms used to better understand the roles, responsibilities, and liabilities of the AZBOSCOG HMIS.

SAP BusinessObjects (SAPBO, formerly Advanced Reporting Tool [ART]): WellSky continues to give users access to a wide variety of reports. New reports are under development.

Agency Administrator: This person who is responsible for HMIS administration at the Participating Agency level and is the lead agency contact with ADOH.

Annual Homeless Assessment Report (AHAR): The annual report to the U.S. Congress on the extent and nature of homelessness in America. The last AHAR submitted from CoC's was 2017. See Longitudinal Systems Analysis.

Annual Performance Report (APR): The HUD-required report is used to track progress and accomplishments of CoC-funded projects.

Arizona Balance of State Continuum of Care (AZBOSCOG): The HUD recognized CoC comprised of homeless projects in thirteen counties within the State of Arizona. The counties covered by the AZBOSCOG are Apache, Cochise, Coconino, Gila, Graham, Greenlee, La Paz, Mohave, Navajo, Pinal, Santa Cruz, Yavapai, and Yuma.

Arizona Balance of State Continuum of Care Homeless Management Information System

(AZBOSCOG HMIS): The database used collectively by partnering agencies within the AZBOSCOG to track coordinated assessment, service needs, progress, and accomplishments of clients.

Arizona Department of Housing (ADOH): The lead agency for the AZBOSCOG HMIS implementation and United Funding Agency/Collaborative Applicant for the AZBOSCOG.

Authentication: The process of identifying a user to grant access to a system or resource based on a username and password.

Client: An individual who has inquired about, is receiving, or has received services from a participating project about whom a participating AZBOSCOG HMIS project collects or maintains personally-identifiable information.

Code of Ethics Agreement: An agreement between Participating Agency users and ADOH that allows access to AZBOSCOG HMIS.

Continuum of Care (CoC) Project: Project receiving funding from HUD through the competitive CoC application process. These projects are identified in the AZBOSCOG HMIS as CoC projects.

Executive Director: A person who serves as the top executive official of a Participating Agency. This person may have a title of chief executive officer or president; this is the person who signs the Partnership Agreement

Housing Inventory Count (HIC): The inventory of beds available for persons experiencing homelessness, including HMIS, seasonal, and overflow beds for individuals and households.

Licensed User: An individual who has been granted access and uses AZBOSCOG HMIS. Licensed Users are the main guardians against violating a person's confidentiality.

Longitudinal Systems Analysis (LSA): This report replaced the AHAR and is produced from a CoC's Homelessness Management Information System (HMIS) and is submitted annually to HUD. The information from the LSA is used by HUD to submit the annual report to Congress, which is still called the AHAR.

Participating Agency: Any agency/project that enters client-level information into AZBOSCOG HMIS.

Point-In-Time (PIT): The annual count of sheltered and unsheltered persons experiencing homelessness on a single night in January. HUD requires that CoCs conduct an annual count of homeless persons who are sheltered in emergency shelter, transitional housing, and Safe Havens on a

single night.

Release of Information (ROI): A statement signed by the client authorizing or denying the AZBOSCOC Participating Agency/project to share their personal information, and information regarding their unique situation with other Participating Agencies.

ServicePoint: A software package written by Bowman Systems, now owned, and operated by WellSky, which tracks data about people in housing crisis to determine individual needs, provide a referral system and create aggregate data for reporting and planning. The software is web-based.

System Administrator: The company contracted by ADOH as the System Administrator for the AZBOSCOC HMIS (currently Solari).

TAY-VI-SPDAT: Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) designed for Transition Aged Youth, aged twenty-four (24) years or younger to predict youth most vulnerable to experience long-term homelessness.

VI-SPDAT: The Vulnerability Index and Service Prioritization Decision Assistance Tool is an assessment tool distributed by OrgCode Consulting Inc. designed to help prioritize housing services for individuals experiencing homelessness based on the acuity of their needs and personal situation.

VI-F-SPDAT: The VI-SPDAT adapted for assessment of families experiencing homeless

WellSky: Formerly known as "Bowman," this is the company/vendor who owns the AZBOSCOC HMIS software known as ServicePoint. ADOH maintains a yearly contract with WellSky for maintenance and support.

II. AZBOSCOC HMIS

ADOH is the lead agency for AZBOSCOC HMIS implementation in the AZBOSCOC.

To ensure the integrity and security of sensitive client confidential information and other data maintained in the database, ADOH requires all Participating Agencies to sign the AZBOSCOC HMIS Partnership Agreement (Attachment A). All Licensed Users must sign a Code of Ethics Agreement (Attachment B) prior to being given access to the AZBOSCOC HMIS. All clients must sign an ROI Form (Attachment C) prior to entry of the individual's data into the system.

A. Roles and Responsibilities

1. Arizona Department of Housing (ADOH)

ADOH is the lead agency for the implementation and maintenance of the statewide AZBOSCOC HMIS.

a. *General Duties*

Policy: ADOH will provide the necessary manuals and forms for all Licensed Users on the ADOH website at <https://housing.az.gov/documents-links/forms/special-needs-continuum> in the HMIS Documents section. Included documents are: AZBOSCOC HMIS Policies and Procedures Manual, the AZBOSCOC Data Quality Plan, the AZBOSCOC HMIS Code of Ethics Agreement, the AZBOSCOC HMIS Partnership Agreement, the Agency Profile Form, the ROI Form, and all other related forms.

These documents are kept up-to-date and in compliance with all HUD policies and requirements. Agency Administrators are responsible for downloading and distributing to Licensed Users within their agency as well as the HUD Data Standards Manual available on the HUD Exchange website <https://www.hudexchange.info/>.

Procedure: ADOH in conjunction with the AZBOSCOC HMIS Committee, updates the AZBOSCOC HMIS Policies and Procedures Manual, the Code of Ethics Agreement, the Partnership Agreement, the Agency Profile Form, and related forms annually by the beginning of each calendar year. Agencies must submit an updated Agency Profile Form **when changes occur in the programs that necessitate updating**. In the event HUD issues interim changes to the requirements, affected policies and procedures and any related documentation will be reviewed and updated at that time. All changes will be communicated to Participating Agencies through the AZBOSCOC HMIS HOME Page dashboard and electronically through the Licensed User e-mail distribution list. All documents will be available for download at <https://housing.az.gov/documents-links/forms/special-needs-continuum> in the HMIS Documents section, and from the System Administrator website <https://community.solari-inc.org/submit-a-ticket/>.

b. AZBOSCOC HMIS Management

Policy: ADOH is responsible for the organization and management of the AZBOSCOC HMIS. ADOH is responsible for all system-wide policies, procedures, communication, and coordination of the AZBOSCOC HMIS. ADOH will act as liaison between Participating Agencies and System Administrator.

Procedure: ADOH and the contracted System Administrator will follow protocols established by WellSky Systems, LLC, in regard to unauthorized access, as established in the WellSky Systems Securing Client Data Policy Manual. A member of ADOH and/or the System Administrator will notify WellSky of any software issues within twelve (12) hours of being made aware of the issue and after an investigation at the state level has taken place. All information received from WellSky pertaining to use, access, reporting, or live site system will be disseminated to Executive Directors or his/her designee within three (3) business days of receipt. No Licensed User, Executive Director, or agency may contact WellSky directly, without the express written consent of ADOH. ADOH's contracted System Administrators may contact WellSky to coordinate system updates, software issues, and other system administration functions.

c. Security Management

Policy: ADOH and System Administrator are responsible for the continuous monitoring of security and License User access.

Procedure: Refer to WellSky Securing Client Data Policy Manual (Attachment D).

d. Licensed User Management

Policy: ADOH and/or the System Administrator give appropriate levels of access to the system based on the Licensed User's position in the Participating Agency, configuration of projects, and designation by the Executive Director. Agencies will notify ADOH of new projects and new Licensed Users electronically or by telephone by contacting the ADOH CoC Coordinator or the ADOH Special Needs Administrator. Both positions can be reached through the ADOH main telephone number of 602.771.1000

Procedure: ADOH in consultation with the Participating Agency Executive Director or his/her designee assigns appropriate Licensed Users levels when adding a new user. ADOH always assigns the most restrictive access to users while still allowing efficient job performance to protect client confidentiality or privacy.

2. System Administrator**a. System Availability**

Policy: WellSky will provide constant availability of AZBOSCOC HMIS and will inform ADOH and/or System Administrator in advance of any planned interruption in service.

Procedure: Scheduled upgrades and maintenance will occur on Friday nights after 9:00 p.m. MST. The System Administrator will inform Licensed Users of the exact date and time at least five (5) business days prior to scheduled upgrade via direct e-mail to all Licensed Users on record. In the event of an unscheduled unavailability, the System Administrator will contact the Licensed Users via email and inform them of the cause and the anticipated duration of the interruption of service. Licensed Users will be notified as quickly as possible of system unavailability, but in no case more than twenty-four (24) hours after service interruption.

b. Licensed Users Management

Policy: ADOH and/or the System Administrator give appropriate levels of access to the system based on user's position in the Participating Agency, configuration of projects, and designation by the Executive Director.

Procedure: Upon notification from ADOH that appropriate documentation has been received by ADOH, the System Administrator will set-up and terminate agencies, projects, and Licensed Users, as needed.

c. Training:

Policy: The contracted System Administrator provides timely training for all new Licensed Users, annual refresher training for current Licensed Users, and SAPBO reporting training in the most efficient and effective way possible.

Procedure: ADOH and/or System Administrator notifies Participating Agencies and Licensed Users of upcoming trainings through the System News available in ServicePoint and/or electronically. Agencies are given no less than thirty (30) days advance notification of such training on the calendar. System Administrator conducts all new Licensed Users training, specialized training relevant to Licensed Users position, and report training. At no time will a Participating Agency contact WellSky directly for training. The System Administrator will send training confirmation responses to registered Licensed Users within three (3) business days of online registration.

3. Participating Agency

A Participating Agency is one that enters client-level data into the AZBOSCOC HMIS. The Executive Director or his/her designee is responsible for ensuring their agency and all Licensed Users within their agency abide by all CoC established regulations, standards, policies, and procedures related to the AZBOSCOC HMIS and clients' rights. Licensed Users will be assigned an appropriate user role in the AZBOSCOC HMIS.

a. General Duties:

Policy: The Executive Director or his/her designee is the person ultimately responsible for compliance with all policies and procedures in this manual, which includes but is not limited to: knowledge and understanding of client rights, grievance procedures, data sharing, agencies security, and all actions and work conducted by Licensed Users in

their agency, including those no longer employed at their agency.

Procedure: The Executive Director must verify and sign all reports or information distributed by their agency for submission or publication. The Executive Director or his/her designee must notify ADOH within twenty-four (24) hours if a Licensed User should be removed from the AZBOSCOC HMIS by notifying the CoC Coordinator by email or telephone.

The Executive Director or his/her designee must complete the Annual Progress Report and submit it to ADOH yearly or upon request. The Executive Director must verify and sign all client requests for information or grievances prior to the release of information to the client and adhere to any additional requirements that may be deemed necessary by the funder or the CoC. The Executive Director is responsible for ensuring that all HMIS Licensed Users comply with the Code of Ethics agreement.

Agencies with Licensed Users who fail to comply with the Code of Ethics agreement may be suspended from AZBOSCOC HMIS. Failure to comply may result in deactivation of all Participating Agency Licensed User accounts and the agency may be non-compliant with HUD and/or other funding regulations.

b. Security Management

Policy: Agencies are responsible for ensuring all hardware and software used to access and/or store AZBOSCOC HMIS client-level data is in a secure location where access is restricted to authorized staff.

Procedure: Agencies may be monitored for security by ADOH through on-site compliance visits. Failure to comply will result in deactivation of all Participating Agency Licensed User accounts.

Agencies **MUST** have:

- A secure broadband Internet connection.
- Wi-Fi is acceptable if the connection is protected by a network security code.

All Workstations at the Participating Agency that access the AZBOSCOC HMIS **must** have:

- Memory minimums:
 - ✓ If Win7 - 2 Gig minimum; 4 Gig recommended.
 - ✓ If Vista - 2 Gig minimum.
- Monitor:
 - ✓ Screen Display - 1024 by 768 (XGA) or higher (1280 by 768 strongly advised).
- Processor:
 - ✓ A Dual-Core processor.

- Browser:
 - ✓ Firefox is recommended.
 - ✓ Chrome is an alternate.
 - ✓ Internet Explorer is an alternate.
- Password Protected Workstation:
 - ✓ All workstations **must** be manually locked by the Licensed User if a they leave a workstation when ServicePoint is active. The system will automatically lock after fifteen (15) minutes of inactivity.
- Current and Active Security:
 - ✓ Real-time antivirus scanning.
 - ✓ Manual virus scanning.
 - ✓ Automatic virus removal.
 - ✓ USB virus scanning.
 - ✓ Anti-spyware.
 - ✓ A firewall.
 - ✓ Anti-phishing.
 - ✓ Anti-spam.

c. Educating Clients of Privacy Rights

Policy: The client intake worker, Licensed User, or caseworker will work with the clients to understand their privacy rights, benefits of sharing data and what their data is used for once entered into the AZBOSCOG HMIS.

Procedure: The Executive Director or his/her designee will ensure that a “Privacy Notice” is posted in an area that is clearly visible to the client. The client must be informed of his/her rights under the privacy policy and should receive a copy of the policy, if requested. The client intake worker, Licensed User, or caseworker will be knowledgeable regarding data sharing policies, release of information policies, and how to enter client-level data at the right confidentiality level in the AZBOSCOG HMIS. ADOH is not liable for client-level data that has been entered into the AZBOSCOG HMIS by a Licensed User in which the client’s right to privacy was violated.

d. Records Management

Policy: The Participating Agency must maintain appropriate documentation of any client ROI records obtained in a secure location for a period of five (5) years after the last date of client service and ensure their subsequent destruction by shredding. In addition, agencies must keep Agency Profile Forms, Agency Partnership Agreements, grievance documentation, and all other HMIS related documentation in a secure location for a period of five (5) years.

Procedure: Records must be made available to the client, upon written request, within fourteen (14) business days. Compliance monitoring is completed by ADOH, as requested by funders, or required by regulation. Agencies will be required to show proof of compliance with the above policy at time of compliance monitoring. Failure to comply will result in deactivation of all Participating Agency Licensed User accounts and the agency may also be considered non-compliant with HUD and/or other funding regulations.

e. Privacy Management

Policy: Agencies will be solely responsible for ensuring clients understand privacy. With the exception of agencies providing services solely to children and youth, all agencies must obtain a signed ROI form from each adult client before entering data into the AZBOSCOG HMIS. All Participating Agencies must post a Privacy Notice at all intake locations. A copy of the Privacy Notice will be made available to all clients at the client's request.

Procedure: A copy of the Privacy Notice and the current ROI form can be found at <https://housing.az.gov/documents-links/forms/special-needs-forms>.

The ROI Form will be in effect for one (1) year from the date of signing. A new ROI Form must be signed annually or when a client re-enters a project for all projects except those serving solely children and youth.

Compliance monitoring is completed by ADOH, as requested by funders, or required by regulation. Agencies will be required to show proof of compliance with the above policy at time of compliance monitoring. Failure to comply will result in deactivation of all Participating Agency Licensed User accounts and the agency may also be considered non-compliant with HUD and/or other funding regulations.

f. Data Sharing

Policy: Data sharing among participating AZBOSCOG HMIS agencies happens when a client agrees to have their information shared.

Procedure: All projects, with exception of HOPWA and Runaway and Homeless Youth (RHY), will have the opportunity to share data for client-level data. Data sharing is solely dependent on the client. No client information is shared in AZBOSCOG HMIS until the Participating Agency enters on the ROI that "Yes" the client agrees to share their information.

g. Documentation

Policy: Before any Participating Agency Licensed User is given access to the AZBOSCOG

HMIS, the Executive Director, or his/her designee, must complete and submit the necessary original documentation to ADOH.

Procedure: The Executive Director or his/her designee **must read, understand, and sign** the AZBOSCOC HMIS Partnership Agreement. The Agency Profile should be reviewed annually and updated when a change occurs.

In addition, the Executive Director must comply with applicable funding agreement requirements regarding AZBOSCOC HMIS participation. Original documents should be returned to ADOH by email to the ADOH CoC Coordinator.

Failure to comply will result in deactivation of all Participating Agency Licensed User accounts and the agency may be non-compliant with HUD and/or other funding regulations.

4. Agency Administrator

An Agency Administrator is the liaison between ADOH or the System Administrator and all other users of their Participating Agency. Agency Administrators will be given the role of “Agency Administrator” in the AZBOSCOC HMIS.

All Agency Administrators must have an e-mail address that is valid and up-to-date and acts as the single point of communication between ADOH and the System Administrator and all other agency Licensed Users.

a. System Management

Policy: Agency Administrators will assist, as needed, the System Administrator in report development and testing custom reports requested by the Participating Agency.

Agency Administrators will also be responsible for disseminating all information to Licensed Users within their agency.

Procedure: Agency Administrators will be made aware via e-mail from the System Administrator of all upcoming system and reporting changes. Agency Administrators are required to test and comment on all custom reports requested by the agency to the AZBOSCOC HMIS Help Desk at <https://community.solari-inc.org/submit-a-ticket/>.

If a response from the Agency Administrator is needed, ADOH or the System Administrator will provide a deadline date for response, which will be no less than five (5) business days and no more than twenty (20) business days. The System Administrator will make the Agency Administrators aware when the final changes are implemented in the AZBOSCOC HMIS or SAPBO reporting software.

Agency Administrators will disseminate system and report changes to all other Licensed Users within their agency within three (3) business days of final change.

b. Agency Management

Policy: The Agency Administrator(s) is the sole Licensed User(s) able and responsible for updating, correcting, and maintaining the provider information in the AZBOSCOG HMIS.

Procedure: Agency Administrators have the ability, in the AZBOSCOG HMIS, to change and update information regarding their agency and all projects for their agency. Agency Administrators verify this information quarterly and make changes as necessary. Failure to comply by maintaining correct agency and project information in the AZBOSCOG HMIS may result in suspension of all agency licenses until corrections are made.

c. Report Management

Policy: Agency Administrators are responsible for supplying the Executive Director or his/her designee with all required reports and/or information for verification and signature in a timely manner prior to submission.

Procedure: Agency Administrators must have knowledge and understanding of reports and due dates for submission or publication and the appropriate person/agency for submission.

d. Training

Policy: Agency Administrators have been selected by the Executive Director or his/her designee as staff members with skills beyond that of a basic Licensed User. Agency Administrators are required to attend a separate training at least one (1) time per year (twelve (12) months) or as needed/requested by ADOH.

Procedure: One (1) hour trainings will be scheduled throughout the calendar year by the System Administrator for Agency Administrators. The System Administrator may select topics in consultation with ADOH and/or based on evaluation of the AZBOSCOG HMIS FAQs on the Help Desk. Licensed User are responsible for checking dates, times, and class agendas on the System News in ServicePoint.

1) Initial Training

Policy: All new Licensed Users must have training with the System Administrator before entering data into HMIS. The System Administrator and agency requesting new Licensed User access will determine training date(s) within forty-

eight (48) hours of referral for access from the HMIS Lead (ADOH) for access to the system. Training must be completed within thirty (30) days of requesting HMIS Licensed User status.

Procedure: System Administrator will conduct trainings each month of the calendar year, except December, for new Licensed Users. Licensed Users must attend at least one (1) training prior to completing assigned tasks for course completion. If the Licensed User is unable to attend, a twenty-four (24) hour notice **must** be given to the System Administrator. The System Administrator shall provide at least thirty (30) days' advance notice of training opportunities. In some cases, shorter notice may be given in consultation with ADOH.

2) Continued Education Training

Policy: Licensed Users must attend at least one (1) AZBOSCOC HMIS Refresher Training course every year (twelve (12) months) to have the continuing skill set for data collection and reporting.

Procedure: ADOH and System Administrator will schedule training options throughout the year and publish information on the System News, as well as send notices directly to Licensed Users. The System Administrator shall provide at least thirty (30) days' advance notice of training opportunities. In some cases, shorter notice may be given with consultation with ADOH. Failure to comply with continuing education of the AZBOSCOC HMIS may result in suspension of the Licensed User's Agency Administrator status until requirements have been fulfilled.

e. *Data Management*

1) Client-Level Data

Policy: Licensed Users will not knowingly enter false or misleading information under any circumstances into AZBOSCOC HMIS regarding the agency, project, or client.

Procedure: Licensed Users will submit all reports and/or information to the Agency Administrator/Executive Director for verification prior to submission to ADOH or the System Administrator.

The Agency Administrator will analyze and verify all data contained in reports and/or information prior to final submission and/or publication. If issues concerning client-level data are raised, the System Administrator may conduct an audit and ask ADOH for a monitoring site visit. The failure of an agency or Licensed Users to comply or proof of violation can result in deactivation of the Licensed User's license permanently.

2) Ethical Data Use

Policy: Data contained in the AZBOSCOG HMIS is only be used to support the delivery of homeless and housing services. Each AZBOSCOG HMIS Licensed User must affirm the principles of ethical data use and client confidentiality contained in the AZBOSCOG HMIS Policies and Procedures Manual and the AZBOSCOG HMIS Code of Ethics Form.

Procedure: Licensed Users will sign an AZBOSCOG HMIS Code of Ethics Form before being given access to the AZBOSCOG HMIS. Any individual or Participating Agency misusing, or attempting to misuse, the AZBOSCOG HMIS will be denied access. Without limitation the failure to comply with the policies and procedures related to the AZBOSCOG HMIS may subject the agency to discipline and termination of access to the AZBOSCOG HMIS and/or termination of other ADOH contracts. Other funders will be notified by ADOH of failure to comply.

3) Data Sharing

Policy: At no time shall a Licensed User alter, change, or delete other agency's data when participating in data sharing.

Procedure: If at any time, client data is in question/conflicting, the AZBOSCOG HMIS Licensed Users **must:** 1) contact his/her own Agency Administrator and explain the data in question; and 2) either contact the agency that originally entered the data to receive clarification or ask the Agency Administrator to contact the agency that originally entered the data. If a resolution or conclusion cannot be reached between the two (2) Licensed Users, the Executive Directors or designees of both agencies must come to a resolution regarding correct data entry. At any time, ADOH or the System Administrator can be requested, in written form, to analyze audit trails for investigative purposes. If a resolution cannot be determined by the Executive Directors or designees of both agencies, one will be determined by ADOH.

4) Data Standards

Policy: Licensed Users must enter all data into the AZBOSCOG HMIS in accordance with the current HUD HMIS Data Standards and the ADOH Data Quality Policy and Procedures.

Procedure: Licensed Users must review and understand the most current HUD HMIS Data Standards and the HUD HMIS Data Standards: HMIS Data Dictionary available at <https://www.hudexchange.info/>. Licensed Users must

review and understand the most current ADOH Data Quality Policies and Procedures available on the ADOH website at <https://housing.az.gov/documents-links/forms/special-needs-continuum> in the HMIS Documents section. Failure to comply with these standards will result in the Licensed User's license being suspended by ADOH until further investigation or training can take place.

f. Client Release of Information

Policy: Licensed Users are the first to safeguard client privacy through compliance with client confidentiality and data sharing policies.

Procedure: Licensed Users in all agencies except for those that provide services to Run-Away and Homeless Youth must obtain a signed Client Acknowledgement Form for each client prior to entering data into AZBOSCOC HMIS. This can be a release or denial of sharing. If a client denies sharing, the Licensed User **must** contact ADOH or System Administrator prior to entering client-level data into the AZBOSCOC HMIS. The Client Acknowledgement Form and the ROI Form are in effect for one (1) year from the date of signing. Licensed Users **must** verify that the ROI entered into the AZBOSCOC HMIS has not expired for the project prior to entering client-level data into the AZBOSCOC HMIS or updating information in the AZBOSCOC HMIS. If the Client Acknowledgement and/or ROI has expired, the Licensed Users **must** obtain a new release prior to updating records. Signed ROI forms **must** be secure and retained for five (5) years from the date of the last service for the client.

5. Clients

AZBOSCOC HMIS is a vehicle for information to be passed from agency to agency regarding client information, services, and referrals. The AZBOSCOC HMIS is geared to save clients time in re-telling their "story" and providing documentation. At no time should a client's rights, confidentiality, or requests be violated.

a. Denial of Service

Policy: No client shall be denied a service for failure to release information for data sharing purposes or refusal to answer informational questions not required for service eligibility screening.

Procedure: Prior to collecting client-identifying information by the agency, clients **must** first sign the ROI form, acknowledging their approval to share or deny sharing of information. If the client is returning to the HMIS system after an absence, client data must be reviewed and updated.

b. Access to Data

Policy: Clients may have access to their data at any time and can ask for detailed explanation

of the information given to them.

Procedure: Clients may request a printed report of their data in the AZBOSCOC HMIS from an agency. Requests for data must be made in writing. Agencies will **only** print and distribute information collected by their agency and not all the client's data entered by other agencies and stored in the AZBOSCOC HMIS. Agencies must comply with a client's request within fourteen (14) business days. Clients can ask for and receive a verbal or written explanation of the report given to them by the agency within seven (7) business days of receipt. Clients may request, in writing and including a self-addressed envelope, a printed report from ADOH containing all their data in the AZBOSCOC HMIS. ADOH will have thirty (30) days to respond to such requests. Clients can ask for and receive a verbal or written explanation of the report given to them by ADOH within seven (7) business days of receipt.

c. Changing Information

Policy: Clients may request that agencies update incomplete and/or incorrect data.

However, if an agency believes the request will result in inaccurate data, the agency may deny the request.

Procedure: If the agency chooses not to update the client's information, they must supplement their decision with additional information within the client notes section of the AZBOSCOC HMIS client record within seven (7) business days of request. Agencies **must** give a written explanation of the decision, which will be copied to the client's file within five (5) business days of decision. When an agency denies a client's request for updating their information, agencies must have a written explanation for refusal in client file within five (5) business days of denial.

d. Denial of Access

Policy: Agencies and ADOH reserve the right to deny a client's request to release his/her information if the information is being compiled in reasonable anticipation of litigation or comparable proceedings, contains personal information about another individual not related to the client, and/or disclosure would possibly endanger the life or physical safety of any individual.

III. COMMUNICATION

A. From ADOH and System Administrator

Policy: ADOH is responsible for relevant and timely communication with each Participating Agency regarding all aspects of the AZBOSCOC HMIS, reporting, and data standards. All Licensed Users **must** provide contact information to receive HMIS communication.

Procedure: Neither ADOH nor the System Administrator is responsible for a Participating Agency's loss of funds due to their negligence in adhering to any updated regulations regarding reporting and data collection. General system and training communications from ADOH and/or the System Administrator will be directed to all persons enrolled in ADOH's HMIS Licensed User distribution list. General communications from ADOH and/or System Administrator will be sent through e-mail communication. Specific communications will be addressed to the person or people involved by direct e-mail communication. For emergency situations, communications will be directed through direct e-mail and the ServicePoint News system located on the HMIS-HOME Page Dashboard.

All FAQs, tip sheets, documentation, policies, procedures, reporting matrix and general help will be located on the ADOH website, <https://housing.az.gov/documents-links/forms/special-needs-continuum> in the HMIS Documents section, the System Administrator website, <https://community.solari-inc.org/homeless-management-information-system/>, and the HMIS-HOME Page Dashboard. Agency Administrators are responsible for distributing that information to any additional Licensed Users at their agency who may need to receive it, including, but not limited to, Executive Directors, client intake workers and data entry specialists.

B. To ADOH and/or System Administrator

Policy: Questions regarding new Licensed Users, Code of Ethics agreements, Agency Profile forms, and Agency Partnership Agreements are submitted to ADOH by email to the ADOH CoC Coordinator. Special reports requiring the System Administrator to adapt or create a report within ServicePoint must be submitted directly to the System Administrator. Licensed Users may submit HMIS questions to ADOH or through the HMIS help desk at <https://community.solari-inc.org/submit-a-ticket/>.

Procedure: To receive the best customer service from the System Administrator, agencies are encouraged to utilize the help desk at <https://community.solari-inc.org/submit-a-ticket/> or call the help desk at (602) 908-3605. The goal of ADOH and the System Administrator is to respond to all needs within one (1) business day of first contact.

C. AZBOSCOG HMIS Help Desk

Policy: The System Administrator maintains Help Desk support for assistance on requests including report issues, requests for system enhancements, technical support, helpful hints, training tips, documentation to download, password reset requests, etc.

Procedure: The HMIS Help Desk is available from 9:00 a.m. to 5:00 p.m., Monday through Friday, excluding observed holidays. Requests for help will be addressed in the order of receipt. Assistance requests will be addressed within twenty-four (24) business hours. All Help Desk requests received after 4:30 p.m. may be addressed the next business day. To receive the most complete response, requests asking for help to identify or resolve issues with reports **should** have the report in question attached to the request.

IV. ACCESS

A. ADOH and System Administrator

Policy: ADOH and the System Administrator have access to retrieve all data in the AZBOSCOC HMIS. ADOH and the System Administrator do not access individual client-level data for purposes other than direct client service-related activities, coordinated assessment, referral, reporting and maintenance, checking for data quality, and responding to Help Desk requests.

Procedure: ADOH is responsible for ensuring that no individual client data is retrieved for purposes other than direct client service, reporting, system maintenance, performing data quality checks, and responding to Help Desk requests. ADOH oversees all reporting to HUD and the public.

All special research requests must be approved by ADOH in coordination with the requesting agency. Reports necessary for funding agreements (e.g. APRs, Consolidated Annual Performance and Evaluation Reports) may be run at the request of the agency or the request of a federal or state partnering agency. Reports containing system-wide information or county/regional information must receive prior approval by ADOH before System Administrator runs and/or provides the report. Please refer to the HMIS Privacy Policy and Notice available on the ADOH website at housing.az.gov.

B. Agency Administrators

Policy: Agency Administrators have the ability to access client-level data in all of their agency projects.

Procedure: Participating agency's designated Agency Administrator have the ability to locate, change, add, or remove client-level data from their agency's projects. The Agency Administrator can generate reports for all of their agency's projects.

C. Licensed Users

Policy: AZBOSCOC HMIS System Administrator assigns the most restrictive security settings to all other Licensed Users not assigned as an Agency Administrator by the Executive Director.

Procedure: AZBOSCOC HMIS System Administrator, in consultation with the agency Executive Director, assigns appropriate user levels when adding or changing user access. Licensed Users do not have the ability to delete or change another project's client-level data. Licensed Users will not always have the ability to generate reports for any and all agency projects based on types of user roles. The AZBOSCOC HMIS System Administrator always assigns the most restrictive access, which allows efficient job performance in the interest of client security.

D. Public Access

Policy: ADOH, under the direction of the ADOH in consultation with the System Administrator, addresses all requests for data from entities other than Participating Agencies in AZBOSCOG HMIS. The public is not given access at any time.

Procedure: The AZBOSCOG HMIS can enter into data sharing agreement with outside organizations under contract with ADOH for:

- Research
- Data Matching
- Evaluation of Services/Planning.

Contracts must include a Data Sharing Agreement. Data Sharing Agreements will require that all parties certify that they will adhere to the strict standards of protecting client-level data employed by the AZBOSCOG HMIS. All AZBOSCOG HMIS-Participating Agencies will be notified in writing if and when ADOH is considering a contract with an outside organization at least thirty (30) days prior to execution of the contract. All public requests for information must be made in writing to ADOH. ADOH will issue periodic public reports and aggregate data about homelessness and housing issues with no previous notice to participating AZBOSCOG HMIS agencies. Such public reports will not reveal identifying information about clients.

V. SECURITY

A. WellSky

1. System Security

Policy: ServicePoint is supported by the most powerful system security measures available.

Using 128-bit encryption, user authentication, and user access levels, ServicePoint ensures that data is protected from intrusion.

Procedure: WellSky employees, who have access to client-level data, are subject to a national background check, training on confidentiality requirements, and must sign a confidentiality statement as part of their employee agreement. The system function logs the time and type of activity, as well as the name of the Licensed Users who viewed, added, edited, or deleted the information.

Servers are secured in complexes with the following security measures in place:

- Twenty-four (24) hour security personnel
- Twenty-four (24) hour video surveillance
- A dedicated and secured Data Center
- Are locked down twenty-four (24) hours per day
- Are only accessible by management-controlled keys
- No access is permitted for cleaning staff
- With a state-of-the-art HVAC and fire suppression system

2. Data Security

Policy: WellSky ensures availability of customer data in the event of a system failure or malicious access by creating and storing redundant records. All data goes across the Internet to the Licensed User's Web browser using AES-256 encryption in conjunction with RSA 2048-bit key lengths.

Procedure: The traffic that flows between the server and the Licensed User's workstation is encrypted using the SSL certificate. Database tape backups are performed nightly. Tape backups are maintained in secure offsite storage. Seven (7) days' backup history is stored on instantly accessible Raid 10 storage. One (1) month's backup history stored offsite. Licensed Users have twenty-four/seven (24/7) access to WellSky's emergency line to provide assistance related to outages or downtime.

3. Unauthorized Access

Policy: If an unauthorized entity were to gain access to the AZBOSCOC HMIS and client data, or if there were suspicion of probable access, the System Administrator and WellSky will take immediate action to protect the security of the system.

WellSky will adhere to the "Securing Client Data" manual (Attachment D).

Procedure: The system would be examined to determine the presence of system or data corruption. If the system has been compromised, the system would be taken offline. Using the previous night's backup, a restored copy of the system data would be loaded onto another server and the system brought back online with the back-up copy. Comparing the back-up database to the database taken offline, an investigation would be launched to determine the extent of the unauthorized activity/corruption and the corrective action needed. Upon completion of the investigation, findings would be reported to ADOH, and options would be discussed. Upon ADOH's approval, corrective action would be initiated. Corrective action could include all or part of the following:

- The original hard drive would be completely erased and rebuilt, including a new operating system, SSL Certificate, applications, and the back-up database.
- If applicable and feasible, lost data from the original database would be restored.

If WellSky or its employees are determined to be at fault for unauthorized access, ADOH may terminate the ServicePoint License and Service Agreement and pursue legal remedies.

B. Licensed Users

A Licensed Users is a person who has signed and submitted an AZBOSCOG HMIS Code of Ethics Agreement, and it is still in effect for the current year. When ADOH is not notified of their termination from the agency within twenty-four (24) hours of termination, neither WellSky, ADOH, nor the System Administrator will be liable for actions of a former agency employee with an active license. The Participating Agency shall be liable and ADOH may terminate access to the AZBOSCOG HMIS and/or terminate ADOH contracts if it determines that the Participating Agency acted carelessly in managing their Licensed Users.

1. Licensed Users Access

Policy: The System Administrator will provide unique usernames and initial passwords to each Licensed Users. Usernames and passwords may not be exchanged or shared with other users.

Procedure: The System Administrator will provide directly to the Licensed Users a unique username and initial password upon completion of training requirements as stated in this manual. ADOH will have access to the list of usernames. ADOH will perform an annual Licensed Users audit for invoicing and licensing proposes. The sharing of usernames will be considered a breach of the AZBOSCOG HMIS Licensed User Agreement and the Partnership Agreement. Exchanging usernames seriously compromises security and accountability to clients. If a breach occurs, it may subject the agency to discipline and termination of access to the AZBOSCOG HMIS and/or termination of other ADOH

contracts.

2. Passwords

Policy: Licensed Users will have access to the AZBOSCOG HMIS via a username and password. Passwords will expire every forty-five (45) days. Passwords are case sensitive and must consist of at least eight (8) characters and include at least two (2) digits. Licensed Users must keep passwords confidential. The Agency Administrators and the System Administrator can reset passwords. Licensed Users can also choose the option of “forgot password” to reset.

Procedure: On the 45th day or when the Licensed Users next logs in, the system will require the Licensed User to create a new password and enter it twice before accessing the database.

The sharing of passwords will be considered a breach of the AZBOSCOG HMIS Licensed User Agreement. If a breach occurs, ADOH may subject the agency to discipline and termination of access to the AZBOSCOG HMIS and/or termination of ADOH contracts.

3. Password Recovery

Policy: Agency Administrators or the System Administrator may reset passwords. Licensed Users can also select the “forgot password” option for a password reset.

Procedure: Licensed Users can request a password reset by submitting a request to the HMIS Help Desk at <https://community.solari-inc.org/submit-a-ticket/> or by calling the Help Desk at (602) 908-3605. Agency Administrators can also reset passwords as requested. Licensed Users can also select “forgot password option” for a password reset.

The Licensed User must enter the password given. The system will only accept this password one time. The system will require the Licensed User to create a new password and enter it twice before accessing the database.

VI. DATA

A. Location of Data Access

1. Remote Access

Policy: Licensed Users will ensure the confidentiality of client data, following all security policies in the AZBOSCOG HMIS Policies and Procedures Manual and adhering to the standards of ethical data use, regardless of the location of the connecting computer. The Executive Director has the responsibility to assure the Licensed User is in compliance with this and all other policies, procedures, agreements, and rules governing the AZBOSCOG HMIS.

All Licensed Users that access the AZBOSCOG HMIS remotely must meet the standards detailed in the security policies and procedures and may only access it for activities directly related to their job. Licensed Users may not access the system from unsecured networks (for example: coffee shops, restaurants, libraries, and other public places).

Examples of Remote Access:

- Personal laptops that were not purchased by the agency.
- Access to the AZBOSCOG HMIS on a network other than that of the agency.
- Private home desktops.

Procedure: ADOH in conjunction with the System Administrator may annually audit remote access by AZBOSCOG HMIS Licensed Users. If a Licensed User is found to have accessed the AZBOSCOG HMIS through an unsecured network, the Licensed User's license will be immediately suspended. ADOH may impose additional sanctions on the agency including termination of access to the AZBOSCOG HMIS and/or termination of ADOH contracts.

B. Agency Data

1. Data Retrieval

Policy: AZBOSCOG HMIS-Participating Agencies will have access to retrieve any individual client-level data and aggregate data for their own projects. Participating agencies will not have access to retrieve client-level or aggregate data for other Participating Agencies or system-wide.

Procedure: Agency Administrators using the ServicePoint SAPBO will only be able to extract data from those records to which they have access based on their level of security given by ADOH and/or the System Administrator. Whenever a Licensed User attempts to access an aggregate report for an unauthorized agency, the report will show "0". SAPBO will limit the user access and only report data from records to which the individual Licensed User has access.

2. Extracted Data

Policy: AZBOSCOC HMIS-Participating Agencies have access to retrieve any individual client-level data and aggregate data for their own projects and download the information onto a local storage vessel. Licensed Users will maintain the security of any client data extracted from the database and stored locally, including data used in custom reporting.

Procedure: Any data printed or downloaded from AZBOSCOC HMIS is protected data and should be held in secured paper or electronic files. All extracted data falls within the same confidentiality procedures as electronically-stored data. ADOH and the System Administrator are not responsible for breaches in data once removed from the AZBOSCOC HMIS. If a Licensed User extracts data, the Participating Agency for which the Licensed User works is responsible for any data breach on data extracted by the Licensed User.

Client personal information exported from the system, either printed or electronic file types, poses a security risk. Client information should only be copied out of the secure HMIS database when necessary. Exported documents with client information should be handled with care and should be immediately destroyed after use, stored in a locked area, or stored in a secure location.

ADOH or the System Administrator will dispose of personal information and remove personal identifiers not in current use seven years after the information was created or last changed.

3. Compliance Security Review

Policy: AZBOSCOC HMIS-Participating Agencies are subject to random or scheduled compliance monitoring checks completed by ADOH.

Procedure: All agencies are self-monitored for security risks and compliance with documentation. Agencies are currently utilizing a security self-certification checklist to verify compliance. The System Administrator will reach out to agencies individually if and when they are not compliant with the checklist.

C. AZBOSCOC HMIS Data Sharing

Agencies are able to share client information with agencies outside of their network with appropriate client authorization. The AZBOSCOC HMIS is a vehicle through which agencies can share data outside of their own agency and network. Statewide reporting is based on aggregate, non-identifying data; therefore, aggregate, non-identifying data may be shared with the public without specific permission. These policies must be made clear to clients as part of the ROI form. To comply with coordinated assessment required by HUD, AZBOSCOC will share the VI-SPDAT and the VI-F-SPDAT with all AZBOSCOC-Participating Agencies. ADOH requires that agencies attend training on the use of the VI-SPDAT and the VI-F-SPDAT.

Policy: All agencies and projects, with the exception of HOPWA, domestic violence service providers, RHY, and those that fall within Federal regulations prohibiting sharing client information, will share client-level data with other AZBOSCOG HMIS- Participating Agencies through the client’s ROI form.

Procedure: The Participating Agency’s Executive Director is responsible for ensuring that all Licensed Users within the agency abide by all the policies and procedures stated within all signed documents including the sharing of data. All clients must have a valid ROI form in their case file, to indicate either approval or denial of sharing their data, prior to Licensed Users entering client-level data into the AZBOSCOG HMIS.

D. Visibility Settings

Policy: All data sharing policies are enforced by ADOH.

Procedure: Each Licensed User’s access to data will be defined by their user type, as described in the Access section of this manual. ADOH conducts at least annual file checks for appropriate client authorization. The System Administrator conducts quarterly user audit reports and submits reports to ADOH.

1. Scanned Document Management

Policy: ADOH is responsible for the organization and management of the AZBOSCOG HMIS. It is necessary to follow standardized procedures to upload documents to ensure uploaded information is useable system-wide.

Procedure: Documents uploaded to a client’s record must have the naming standards of:

- Client ID#, Document Title, Date Saved

Example: *123456, Homeless Verification, 11/20/2013*

File attachments may only be uploaded to the client profile screen under “File Attachments.” Licensed Users may never remove documents of another agency and may only remove theirs when uploading an updated version. Unless otherwise noted by client denial, all file attachments will be shared by agencies sharing data.

E. Data Shared Information

Policy: All client information in AZBOSCOG HMIS is locked down and not shared until the agency enters the ROI and indicates whether or not the client gives permission.

Procedure: An ROI is required for each project through which the client is receiving access to services. Since all clients served by a participating AZBOSCOG project are required to enter a Coordinated Entry assessment, there has to be a corresponding Coordinated Entry ROI. Then

the project serving the client also requires a corresponding ROI. The client needs to sign only one ROI form, but the agency has to enter a separate ROI for each entry into AZBOSCOG HMIS in order to share data correctly and for reports to be able to pull correct data. Agencies are responsible for making sure that the client understands the importance of sharing their data for more efficient servicing of their needs, especially for Coordinated Entry.

F. Data Quality

The data standards established by HUD and ADOH are applied to all projects reporting client-level data in the AZBOSCOG HMIS. At no time do standards increase or decrease with the source of funding for the project. To have correct, accurate, and reliable reporting in a timely manner, all projects **must** adhere to the policies and procedures established. Please refer to the [HMIS Data Quality Plan](#) available on the ADOH website at <https://housing.az.gov/documents-links/forms/special-needs-continuum> in the HMIS Documents section, and the [HMIS Data Standards Manual](#) and [HMIS Data Standards: HMIS Data Dictionary](#) available on the HUD website <https://www.hudexchange.info/>.

1. License Suspension and/or Replacement

Policy: At any time, ADOH reserves the right to suspend a Licensed User's license if a Licensed User is having difficulty entering client-level data and providing accurate reports. ADOH and the System Administrator can recommend and require the Executive Director to assign a different staff member or volunteer to attend training and enter client-level data.

Procedure: The Agency Administrator will evaluate their data by use of the 0252 report. System Administrator will identify trends when running the agency score card. Contact will be made by the Agency Administrator to determine training needs of the agency, provide training, and evaluate the agency performance.

2. Violation of Data Quality and Integrity

Policy: In its discretion, ADOH may withhold funds or deduct points on future grant applications for agencies that violate the data quality policies and procedures.

Procedure: Such action will be handled pursuant to ADOH's SND Corrective Action and Monitoring Policies.

VII. LICENSING AND INVOICING

The fee structure outlined below is the investment needed by agencies to pay the software cost of the HMIS contract for Balance of State (BOS). The BOS HMIS program is committed to drive and inspire data-informed change to improve homeless systems.

Agency Access Fee

• <i>Tier 1- HUD COC/ESG/CDBG programs</i>	<i>\$250</i>
• <i>Tier 2- AHCCCS Health Plans, SSVF/VA, PATH, YOUTH, DES, DDD</i>	<i>\$2500</i>
• <i>Tier 3- Health Homes/MCOs</i>	<i>\$1000</i>
• <i>Tier 4- Non CoC Agencies</i>	<i>\$350</i>
• <i>Tier 5- Small non-profits/Access Points</i>	<i>\$150</i>

If an agency would like to purchase additional HMIS licenses they may do so at the additional costs listed below.

- The Access Fee as listed in the Tier scale above will be charged to all agencies regardless of the number of licenses each agency has.
- If agencies have more than one agency type/project type, the highest cost will be used
- Each agency will be charged this fee annually but only once across all projects
- The Access Fee will provide the basic level of service outlined in the partnership agreement:
 - 24/7 access to HMIS
 - Webinars & Online Trainings
 - Help Desk Assistance via web portal and phone during business hours

Access and license fees will be established each year based on the ADOH/Wellsky contract rate. HMIS licenses fees will also be charged annually.

- The User license fee is \$230.00, non-refundable and not pro-rated
- The ART license fee is \$98.00, non-refundable and not pro-rated

Additional Services Fees:

- Agencies will be allocated 1 hour of customization per user to be used for custom reporting, custom training or custom program setup. Requests which exceed this allocation may be contracted separately as outlined below.
- Services or data requests that require specific project planning can be contracted separately at a rate of \$150 per hour. This may be charged to HMIS-participating or non-participating entities. Projects cleared through the CoC MOU Process are exempt from this requirement.

1. Annual Invoice

Policy: ADOH will send an invoice to each Executive Director of each agency or the appropriate staff at a partnering federal or state agency.

Procedure: Notices will be sent via email and/or postal service. Payments are due within forty-five (45) days of receipt of invoice. Late fees may be assessed. Non-payment of license fees may result in suspension of access to HMIS by ADOH. ADOH will make all project

representatives aware of agencies that have had their Licensed User licenses suspended. All grant funds may be held for all components until payment is made to ADOH, if applicable.

2. Pro-Rated License

Policy: Licenses purchased during the calendar year separate from the annual invoice will not be pro-rated.

Procedure: The licensing ADOH HMIS User Fees structure is in the process of being revised. The fee structure was updated in December, 2023.

ADOH reserves the right to mandate follow-up training for the new Licensed User prior to reactivation, pursuant to ADOH's SND Corrective Action and Monitoring Policies.

VIII. GRIEVANCES

A. From a Participating Agency or Client to ADOH or the AZBOSCOC HMIS

Policy: AZBOSCOC HMIS-Participating Agencies have the right to file a grievance against ADOH. Clients have the right to file a grievance against a Participating Agency regarding AZBOSCOC HMIS.

Procedure: ADOH will respond within thirty (30) days to complaints from a Participating Agency, families, owners, employees, and members of the public. All complaints must be submitted in writing and will be documented.

- Categories of Complaints
 - ✓ Complaints from clients: a client disagrees with an action or inaction of ADOH or System Administrator.
 - ✓ Complaints from Participating Agencies or other HUD-funded programs: an AZBOSCOC HMIS-Participating Agency, a HUD-funded program or other federal-funded program disagrees with an action or inaction of ADOH and/or System Administrator.

The complaining party will submit the complaint in writing to ADOH's Special Needs Programs Administrator within seven (7) business days of the date of occurrence. It is ADOH's objective to resolve disputes at the lowest level possible and to make every effort to avoid the most severe remedies. However, if this is not possible, ADOH will ensure that applicants and participants will receive all of the protections and rights afforded by the law and applicable regulations.

IX. PARTICIPATION TERMINATION

A. Initiated by the Participating Agency

Policy: The termination of the AZBOSCOC HMIS Partnership Agreement by the Participating Agency will affect other contractual relationships with ADOH. In the event of termination of the AZBOSCOC HMIS Partnership Agreement, all data entered into the AZBOSCOC HMIS will remain an active part of the AZBOSCOC HMIS and the records will retain their original security settings.

Procedure: HUD-funded agencies are required to participate in the AZBOSCOC HMIS or a comparable database as a condition of their funding. For those that are terminating their contract with AZBOSCOC HMIS, this will be addressed in the context of the larger Agency Grant Agreement by ADOH. For those Participating Agencies that are not HUD-funded, the person signing the initiating AZBOSCOC HMIS Partnership Agreement will notify ADOH with a date of termination in writing. In all cases of termination of the AZBOSCOC HMIS Partnership Agreement, ADOH, in coordination with the System Administrator, will deactivate all Licensed Users from the agency on the date of termination stated by the agency. All client-level data entered into the AZBOSCOC HMIS will remain an active part of the AZBOSCOC HMIS and the records will retain their original security settings.

B. Initiated by ADOH

Policy: ADOH will terminate the AZBOSCOC HMIS Partnership Agreement for non-compliance with the terms of that agreement.

Procedure: HUD-funded agencies that work with the homeless are required to participate in the AZBOSCOC HMIS. For those that are terminated, this will be addressed in the context of the larger Agency Grant Agreement by ADOH. For those Participating Agencies that are not HUD-funded, ADOH will notify the person that signed the initiating AZBOSCOC HMIS Partnership Agreement or that person's successor with a date of termination in writing. ADOH will give thirty (30) days' written notice to the agency, regardless of funding source, to the attention of the Agency's designated HMIS representative. ADOH requires any AZBOSCOC HMIS violations to be rectified before the AZBOSCOC HMIS Partnership Agreement termination is final. ADOH may also terminate the AZBOSCOC HMIS Partnership Agreement without cause upon thirty (30) days written notice to the Participating Agency. The termination of the AZBOSCOC HMIS Partnership Agreement may affect other contractual relationships with ADOH.

In all cases of termination of the AZBOSCOC HMIS Partnership Agreement, ADOH will notify the System Administrator to make all Licensed Users from the agency inactive on the date of termination. All client-level data entered into the AZBOSCOC HMIS will remain an active part of the AZBOSCOC HMIS, and the records will retain their original security settings.

X. PROJECTS IN AZBOSCOC HMIS

A. Adding a New Project in AZBOSCOC HMIS by Participating Agency

Policy: The Executive Director or his/her designee will notify ADOH thirty (30) days prior to implementation of a new project.

Procedure: At least thirty (30) days prior to anticipated implementation date, the Executive Director or his/her designee will submit an Agency Profile form to ADOH. Being a newly added project in the AZBOSCOC HMIS, the following standard formula is used when creating a name within AZBOSCOC HMIS:

- Parent Agency - Project Name - Funding Source - Type of Service - CoC
 ✓ Example: *Johnson County CAP - Joe's House Step Two – CoC – TH – BOS*
- ADOH will send the completed partnership agreement with a New Agency Request form to the System Administrator via the Help Desk.

B. Changes to Existing Projects in AZBOSCOC HMIS

Policy: The Executive Director or his/her designee will notify ADOH of programmatic changes.

Procedure: The Executive Director or his/her designee will notify ADOH of any applicable programmatic changes to existing programs which may have an effect on data collection, data entry, data quality, or data reporting at least forty-five (45) business days prior to the implementation date of the change. Recommendations and timelines for the changes will be returned to the Participating Agency no more than ten (10) business days from receipt date of request. The System Administrator will complete changes at least seven (7) business days prior to the implementation date for final approval from the Participating Agency.

C. Additional Customization

Policy: The Participating Agency will be solely responsible for additional database customization costs. This includes the voluntary transfer of the existing grant's client-level data and custom-build reports beyond that of the System Administrator's scope of work.

Procedure: The Agency Administrator or Executive Director will notify ADOH of any applicable programmatic customization which may have an effect on data collection, data entry, data quality, or data reporting at least forty (40) business days prior to the implementation date of the change. Proposed customization and/or changes must be submitted in writing.

If support from WellSky is necessary to make the changes, ADOH and/or the System Administrator will communicate to WellSky the needs and scope of work for the Participating Agency.

Recommendations and timelines for the changes will be returned to the Participating Agency no more than ten (10) business days from receipt date of request, including a Statement of Work from WellSky,

if applicable. The System Administrator will complete changes at least seven (7) business days prior to the implementation date for final approval from the Participating Agency. If a Participating Agency voluntarily transfers an existing grant to another agency, ADOH will not pay for client-level data to be transferred. The agency requesting the transfer will be liable for any fees incurred.

**XI. ACKNOWLEDGEMENT OF RECEIPT
of the AZBOSCOG HMIS Policies and Procedures Manual**

By signing this form, you acknowledge receipt of the AZBOSCOG HMIS Policies and Procedures Manual from Arizona Department of Housing (ADOH). Your signature further certifies that you have read, understand, and will abide by the policies and procedures, as detailed in this document, as well as accept any measures taken for violation of these practices. Please note, the AZBOSCOG HMIS Policies and Procedures Manual is subject to change.

Signature of Licensed User

Print Name Licensed User

Date

Signature of Executive Director

Printed Name of Executive Director

Date

Return signed form to the ADOH CoC Coordinator, Cristina Benitez:

Via e-mail:

cristina.benitez@azhousing.gov

ATTACHMENT A – AZBOSCOC HMIS PARTNERSHIP AGREEMENT



ARIZONA BALANCE OF STATE CONTINUUM OF CARE HOMELESS MANAGEMENT INFORMATION SYSTEM PARTNERSHIP AGREEMENT

<https://housing.az.gov/documents-links/forms/special-needs-continuum> in the HMIS DOCUMENTS section.

ATTACHMENT B – CODE OF ETHICS



New HMIS User Setup Instructions Code of Ethics for Persons Using the HMIS

<https://housing.az.gov/documents-links/forms/special-needs-continuum> in the HMIS DOCUMENTS section.

ATTACHMENT C – CLIENT RELEASE OF INFORMATION

**ATTACHMENT C
AZBOSCOG HMIS
CLIENT RELEASE OF INFORMATION**

<https://housing.az.gov/documents-links/forms/special-needs-continuum> in the HMIS DOCUMENTS section.

ATTACHMENT D – WELLSKY SYSTEMS (SECURING CLIENT DATA)



SECURING CLIENT DATA

<https://housing.az.gov/documents-links/forms/special-needs-continuum> in the HMIS DOCUMENTS section.