ARIZONA BALANCE OF STATE

CONTINUUM OF CARE

Arizona Balance of State Continuum of Care
HMIS Policies and Procedures

**Arizona
Department
of Housing**

EQUAL HOUSING
OPPORTUNITY

Table of Contents

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.

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 US 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)/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 AZBOSCOC HMIS. Some projects funded through the U.S. Veterans Administration and the U.S. Department of Health and Human Services may be required to enter data into the AZBOSCOC HMIS, as well. In addition, the AZBOSCOC encourages agencies that do not receive federal funds to participate in the AZBOSCOC HMIS so that service provision in the AZBOSCOC 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 CFR578 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 for updates and being in constant compliance with all data standards.

Terminology
Many of the terms used in the AZBOSCOC 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 AZBOSCOC HMIS.

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 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 LSA.

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

Arizona Balance of State Continuum of Care (AZBOSCOC): The HUD recognized Continuum of Care comprised of homeless projects in thirteen counties within the State of Arizona. The counties

covered by the AZBOSCOC 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 (AZBOSCOC HMIS): The database used collectively by partnering agencies within the Arizona Balance of State Continuum of Care to track coordinated assessment, service needs, progress, and accomplishments of clients.

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

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 AZBOSCOC HMIS project collects or maintains personally-identifiable information.

Code of Ethics Agreement: An agreement between participating agency users and ADOH that allows access to AZBOSCOC HMIS.

Continuum of Care (COC) Project: Project receiving funding from HUD through the competitive COC application process. These projects are identified in the AZBOSCOC 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.

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 Annual Homeless Assessment Report (AHAR).

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

Point-In-Time (PIT): The annual **count** of sheltered and unsheltered persons experiencing homelessness on a single night in January. HUD requires that Continuums of Care 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 <u>authorizing</u> or <u>denying</u> the participating AZBOSCOC 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 staff contracted by ADOH as BOSCOC System Administrator for the AZBOSCOC HMIS. Community Information and Referral is the current System Administrator for AZBOSCOC HMIS.

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

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

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 formerly known as ServicePoint. ADOH maintains a yearly contract with WellSky for maintenance and support.

AZBOSCOC HMIS

The Arizona Department of Housing (ADOH) is the lead agency for AZBOSCOC HMIS implementation in the Arizona Balance of State Continuum of Care.

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

Roles and Responsibilities

Arizona Department of Housing (ADOH)

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

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 liaisons between 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 System Administrator will notify WellSky of any software issues within twelve (12) hours of being made aware of the issue and 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 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.

Documentation

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 Release of Information Form, and all other related forms.

Arizona Department of Housing

Policy: ADOH will provide the necessary manuals and forms for all users on the Arizona Department of Housing website: housing.az.gov These documents are kept up-to-date and in compliance with all HUD policies and requirements. Agency Administrators is responsible for downloading and distributing to end 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. Agencies must submit an updated Agency Profile Form **when changes occur in the programs that necessitate updating**. By the beginning of each calendar year, the documents will be reviewed and updated. 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 HMIS system (i.e., "System News") and electronically through the end user e-mail distribution list. All documents will be available for download at, housing.az.gov and the System Administrator website www.hmisaz.org.

Security Management

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

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

Training

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

Procedure: ADOH and/or System Administrator notifies participating agencies and 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 trainings on the calendar. System Administrator conducts all new user training, specialized training relevant to user 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 users within three (3) business days of online registration.

Agency Management

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

Procedure: Agencies will notify ADOH of new projects and new 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

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

System Availability

Policy: WellSky will provide constant availability of AZBOSCOC HMIS and will inform users 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 users of the exact date and time at least five (5) business days prior to scheduled upgrade via direct e-mail to all end users on record. In the event of an unscheduled unavailability, the System Administrator will contact the end users via email and inform them of the cause and the anticipated

duration of the interruption of service. Users will be notified as quickly as possible of system unavailability, but in no case more than twenty-four (24) hours after service interruption.

Participating Agency

A participating agency is one that enters client-level data into the AZBOSCOC HMIS.

General Duties:

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 agency user accounts and the agency may be non-compliant with HUD and/or other funding regulations.

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 user if a licensed user leaves 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.

Records Management

Policy: The participating agency must maintain appropriate documentation of any client Release of Information records obtained in a secure location for a period of five (5) years after the last date of client service and assure 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 agency user accounts and the agency may be non-compliant with HUD and/or other funding regulations.

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 Release of Information form from each adult client before entering data into the AZBOSCOC HMIS. All HMIS 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 Release of Information form can be found at housing.az.gov The Release of Information Form will be

in effect for one (1) year from the date of signing. A new Release of Information 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 above policy at time of compliance monitoring. Failure to comply will result in deactivation of all agency user accounts and the agency may be non-compliant with HUD and/or other funding regulations.

Data Sharing

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

Procedure: All projects, with exception of HOPWA and 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 AZBOSCOC HMIS until the participating agency enters the ROI stating that "Yes" the client agrees to share their information.

Executive Director:

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.

Documentation

Policy: Before any agency user is given access to the AZBOSCOC 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 the 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 agency user accounts and the agency may be non-compliant with HUD and/or other funding regulations.

Ultimate Responsibility

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 publications. The Executive Director or his/her designee must notify ADOH within twenty-four (24) hours if a 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 to ADOH annually 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 users comply with the Code of Ethics agreement.

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

Agency Administrator:

An Agency Administrator is the liaison between ADOH/System Administrator and all other agency users. 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 act as the single point of communication between ADOH/System Administrator and all other agency users.

System Management

Policy: Agency Administrators will assist, as needed, the System Administrator in report development and testing custom reports requested by the agency. Agency Administrators will also be responsible for disseminating all information to 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 HMIS-support@solari-inc.org.

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 ART reporting software. **Agency Administrators will disseminate system and reporting changes to all other users within their agency within three (3) business days of final change.**

Agency Management

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

Procedure: Agency Administrators have the ability, in the AZBOSCOC 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 AZBOSCOC HMIS may result in suspension of all agency licenses until corrections are made.

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.

Training

Policy: Agency Administrators have been selected by the Executive Director or his/her designee as the staff member with the skills beyond that of a basic 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 AZBOSCOC HMIS FAQs on the Help Desk. Users are responsible for checking dates, times, and class agendas on the System News in ServicePoint. Failure to comply with continuing education of the AZBOSCOC HMIS may result in suspension of the user's Agency Administrator status until requirements have been fulfilled.

User:

A licensed AZBOSCOC HMIS user is responsible for ensuring their agency's client-level data is entered correctly and complies with all client rights, confidentiality and data sharing in compliance with COC regulations, standards, policies, and procedures. Users will be assigned an appropriate user role in the AZBOSCOC HMIS.

Client-Level Data

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

Procedure: 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. ADOH or the System

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. Failure of an agency or user to comply or proof of violation can result in deactivation of the user's license permanently.

Ethical Data Use

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

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

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 AZBOSCOC HMIS 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) 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.

Client Release of Information

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

Procedure: Users in all agencies with the exception of 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 user **must** contact ADOH or System Administrator prior to entering client-level data into the AZBOSCOC HMIS. The Client Acknowledgement Form and the Release of Information Form are in effect for one (1) year from the date of signing. Users **must** verify that the Release of Information 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 Release of Information has expired, the user **must** obtain a new release prior to updating records. Signed Release of Information forms **must** be secure and retained for five (5) years from the date of the last service for the client.

Initial Training

Policy: All new users must have training with the System Administrator before entering data into HMIS. The System Administrator and agency requesting new 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 user status.

Procedure: System Administrator will conduct trainings each month of the calendar year, except December, for new users. Users must attend at least one (1) training prior to completing assigned tasks for course completion. If the user is unable to attend, a twenty-four (24) hour notice **must** be given to 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.

Continued Education Training

Policy: 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 users. 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.

Data Standards

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

Procedure: 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/. Users must review and understand the most current ADOH Data Quality Policies and Procedures available on the ADOH website at housing.az.gov Failure to comply with these standards will result in the user's license being suspended by ADOH until further investigation or training can take place.

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.

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 Release of Information form, acknowledging their request 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.

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 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.

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.

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 complied in reasonable

anticipation of litigation or comparable proceedings, contains personal information about another individual not related to the client and/or by disclosure would possibly endanger the life or physical safety of any individual.

Educating Clients of Privacy Rights

Policy: The client intake worker, 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 AZBOSCOC 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, user, and 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 AZBOSCOC HMIS. ADOH is not liable for client-level data that has been entered into the AZBOSCOC HMIS by a user in which the client's right to privacy was violated.

COMMUNICATION

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 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 End 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 though direct e-mail and the ServicePoint News system located on the home screen of the AZBOSCOC HMIS.

All FAQs, tip sheets, documentation, policies, procedures, reporting matrix and general help will be located on the ADOH website, housing.az.gov the System Administrator website, www.hmisaz.org, and the home screen of the AZBOSCOC HMIS. Agency Administrators are responsible for distributing that information to any additional users at their agency who may need to receive it, including, but not limited to, Executive Directors, client intake workers and data entry specialists.

To ADOH and/or System Administrator

Policy: Questions regarding new users, Code of Ethics agreements, Agency Profile forms, and Agency Partnership Agreements should be 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 through the ADOH. Users may submit HMIS questions to ADOH or through the HMIS help desk at HMIS-support@solari-inc.org.

Procedure: To receive the best customer service from the System Administrator, agencies are encouraged to utilize the help desk at HMIS-support@solari-inc.org 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.

AZBOSCOC 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 Solari observed holidays. Help requests will be addressed in the order of receipt. Help 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.

ACCESS

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 requesting agency. Reports necessary for funding agreements (Annual Performance Reports, 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.

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.

User Access

Policy: AZBOSCOC HMIS System Administrator assigns the most restrictive security settings to all other 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. Users do not have the ability to delete or change another project's client-level data. Users will not always have the ability to generate reports for any and all agency projects based on types of user roles. AZBOSCOC HMIS

System Administrator always assign the most restrictive access, which allows efficient job performance in the interest of client security.

Public Access

Policy: ADOH, under the direction of the ADOH Legal Department, addresses all requests for data from entities other than participating AZBOSCOC HMIS. The public is not given access at any time.

Procedure: The AZBOSCOC 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 AZBOSCOC HMIS. All AZBOSCOC 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 AZBOSCOC HMIS agencies. Such public reports will not reveal identifying information about clients.

SECURITY

WELLSKY

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 user who viewed, added, edited, or deleted the information.

Servers are located in complexes with:
- Twenty- four (24) hour security personnel.
- Twenty- four (24) hour video surveillance.
- Dedicated and secured Data Center.
- Locked down twenty- four (24) hours per day.
- Only accessible by management-controlled key.
- No access is permitted to cleaning staff.
- State-of-the-art HVAC and fire suppression system.

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 going across the Internet to the user's Web browser uses AES-256 encryption in conjunction with RSA 2048-bit key lengths.

Procedure: The traffic that flows between the server and the user's workstation is encrypted using the SSL certificate installed on ADOH's dedicated server. 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. Users have twenty-four/seven (24/7) access to WellSky   emergency line to provide assistance related to outages or downtime.

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.

Licensed Users

A licensed user is a person who has signed and submitted an AZBOSCOC 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 Agency shall be liable and ADOH may terminate access to the AZBOSCOC HMIS and/or terminate ADOH contracts if it determines that the Agency acted carelessly in managing their licensed users.

User Access

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

Procedure: The System Administrator will provide directly to the user 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 user audit for invoicing and licensing proposes. The sharing of usernames will be considered a breach of the AZBOSCOC HMIS 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 AZBOSCOC HMIS and/or termination of other ADOH contracts.

Passwords

Policy: Users will have access to the AZBOSCOC 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. Users must keep passwords confidential. Only the user knows his/her password. ADOH, agency administrators, and the System Administrators can reset passwords. Users can also choose the option of forgot password to reset. They cannot tell the user their password.

Procedure: On the 45th day or when the user next logs in, the system will require the 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 AZBOSCOC HMIS User Agreement. If a breach occurs, ADOH may subject the agency to discipline and termination of access to the AZBOSCOC HMIS and/or termination of ADOH contracts.

Password Recovery

Policy: Agency Administrators may reset passwords. If the Agency Administrator is unavailable or otherwise unable to reset a password for an end user, ADOH, or the System Administrator can reset a user's password in the event the password is forgotten. Users can also select the "forgot password" option for a password reset.

Procedure: Users can request a password reset by submitting a request to the AZBOSCOC HMIS Help Desk at hmis-support@solari-inc.org or by calling the Help Desk at (602) 908-3605. Agency administrators can also reset passwords as requested. Users can also select "forgot password option" for a password reset.

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

DATA

Location of Data Access

Remote Access

Policy: Users will ensure the confidentiality of client data, following all security policies in the AZBOSCOC 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 user is in compliance with this and all other policies, procedures, agreements, and rules governing the AZBOSCOC HMIS.

All users that access the AZBOSCOC 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. 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 AZBOSCOC HMIS on a network other than that of the agency.
- Private home desktops.

Procedure: ADOH may annually audit remote access by AZBOSCOC HMIS users. If a user is found to have accessed the AZBOSCOC HMIS through an unsecured network, the user license will be immediately suspended. ADOH may impose additional sanctions on the agency including termination of access to the AZBOSCOC HMIS and/or termination of ADOH contracts.

Agency Data

Data Retrieval

Policy: AZBOSCOC 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 Report Writer or ART 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 user attempts to access an aggregate report for an unauthorized agency, the

report will show "0". Both Report Writer and ART will limit the user access and only report data from records to which the individual user has access.

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. 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 user.

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. Solari will reach out to agencies individually if and when they are not compliant with the checklist.

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 polices would be made clear to clients as part of the Release of Information 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 exception of HOPWA, domestic violence service providers, RHY, and those that fall within Federal regulations prohibiting not sharing

client information, will share client-level data with other AZBOSCOC HMIS-participating agencies through the client's Release of Information 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 Release of Information form in their case file prior to users entering client-level data into the AZBOSCOC HMIS to indicate either approval or denial of sharing their data.

Visibility Settings

Policy: All data sharing policies are enforced by ADOH.

Procedure: Each 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 submit reports to ADOH.

Scanned Document Management

Policy: ADOH is responsible for organization and management of the AZBOSCOC 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". 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.

Data Shared Information

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

Procedure: An ROI is required for each project that the client is receiving access to services. Since all clients served by a participating AZBOSCOC project is 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 Release of Information form, but the agency has to enter a separate ROI

for each entry into AZBOSCOC HMIS in order data to share correctly and for reports to be able to pull correct data. Agencies are responsible to make sure that the client understands the importance of sharing their data for more efficient servicing of their needs especially for Coordinated Entry.

Data Quality

The data standards established by HUD and ADOH are applied to all projects reporting client-level data in the AZBOSCOC 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 Arizona Balance of State Continuum of Care Data Quality Plan available on the ADOH website at: https://housing.az.gov/hmis-data-quality-plan and the HMIS Data Standards Manual and HMIS Data Standards: HMIS Data Dictionary available on the HUD website https://www.hudexchange.info/

License Suspension and/or Replacement

Policy: At any time, ADOH reserves the right to suspend a user's license if a 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.

Violation of Data Quality and Integrity

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

Procedure: Such action will be conducted in accordance with the ADOH AZBOSCOC Policies and Procedures Manual.

LICENSING AND INVOICING

To carry out its responsibilities as the Lead Agency for the AZBOSCOC HMIS, ADOH has secured funding through the COC project funds. By seeking to maximize these resources, ADOH has been able to provide Service Point to AZBOSCOC users free of charge and keep fees at an affordable level to partnering agencies. Agencies that receive federal funds and are required through their funding agency to participate in AZBOSCOC HMIS but do not receive funds through the AZBOSCOC may be required to pay license fees and a nominal data collection fee to help cover the costs of handling data that is analyzed and combined with AZBOSCOC HMIS data for reporting.

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 thirty (30) days of receipt of invoice. Late fees may be assessed. Non-payment licenses may be suspended by ADOH. ADOH will make all project representatives aware of agencies that have had their user licenses suspended. All grant funds may be held for all components until payment is made to ADOH, if applicable.

Pro-Rated License

Policy: Executive Directors will be invoiced on a pro-rated basis for users that are licensed during the calendar year.

Procedure: ADOH will use the following formula to determine the amount that should be charged for the license:
- Total price/12 = price per month;
- Price per month x number of full months remaining in the year = price for pro-rated balance of year;
- Count the number of days left in the month;
- Price per month/number of days in month = price per day;
- Number of days left in month x price per day = price for that pro-rated month;
- Price for pro-rated month + price for pro-rated balance of year = total of user license.

Payment **must** be received by ADOH within thirty (30) days of activation. If the payment is not received, the new user license may be suspended by ADOH.

ADOH reserves the right to mandate follow-up training for the new user prior to reactivation.

GRIEVANCES

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 the AZBOSCOC HMIS.

Procedure: ADOH will respond within thirty (30) days to complaints from 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.

PARTICIPATION TERMINATION

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 the AZBOSCOC HMIS, this will be addressed in the context of the larger Agency Grant Agreement by ADOH. For those participating agencies that are non-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, the System Administrator or ADOH will deactivate all 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.

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 non-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 person who initiated the agreement or their successor. 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 inactive all users from the agency 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.

PROJECTS IN AZBOSCOC HMIS

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*

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.

Additional Customization

Policy: The participating agency will be solely responsible for additional database customization costs. This includes the voluntary transfer of existing grant 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.

ACKNOWLEDGEMENT OF RECEIPT
of the AZBOSCOC HMIS Policies and Procedures Manual

By signing this form, you acknowledge receipt of the AZBOSCOC 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 AZBOSCOC 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

<u>**Return signed form to ADOH:**</u>
Via e-mail:
To the ADOH COC Coordinator

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?tid_2=409

ATTACHMENT B – CODE OF ETHICS

Arizona Department of Housing

Code of Ethics for Persons Using

Arizona Balance of State Continuum of Care Homeless Management Information System (AZBOSCOC HMIS)

HMIS Homeless Management Information System

https://housing.az.gov/documents-links/forms/special-needs-continuum?tid_2=409

ATTACHMENT C – CLIENT RELEASE OF INFORMATION

ATTACHMENT C
AZBOSCOC HMIS
CLIENT RELEASE OF INFORMATION

https://housing.az.gov/documents-links/forms/special-needs-continuum?tid_2=409

ATTACHMENT D – WELLSKY SYSTEMS (SECURING CLIENT DATA)

Arizona
Department
of Housing

ADOH

HMIS Security and Confidentiality

https://housing.az.gov/documents-links/forms/special-needs-continuum?tid_2=409