Tampa/Hillsborough County Continuum of Care

HMIS Standard Operating Procedures

Developed by:
UNITY Advisory Committee
Tampa Hillsborough Homeless Initiative
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Purpose

This document provides the policies, procedures, guidelines, and standards that govern the UNITY Information Network (UIN). UNITY staff will provide each UNITY Member Agency provider with a copy of this document. As a condition of participation, each UNITY Member Agency is required to adhere to all policies within the document as signed in the UNITY Agency Agreement. Refer to Section 3 about UNITY Member Agency responsibilities and sanctions.

Exceptions

In order to mitigate risk from participation in the UNITY system, the UNITY Information Network has the right to grant exemptions to any UNITY policy only in the following instances:

- unique circumstances/programs not encountered before by UNITY staff,
- public policy decisions needing some considerations,
- or in need of quick timelines for implementation.

No other considerations will be considered.

Acknowledgments

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Glossary

This glossary includes a list of terms that will be used throughout this document and by the UIN staff.

Agency Administrator (AA) – A person designated by a UNITY Partner Agency Executive Director/Chief Executive Officer and who acts as a liaison and contract person to the UIN staff.

End User (EU) – Any user who has an active license to UNITY. This can include Agency Administrators.

HMIS Lead – refers to the designated Homeless Management Information System (HMIS) Lead agency that oversees the day to day operations of the HMIS.

HUD - Acronym used to refer to the Department of Housing and Urban Development.

UNITY Partner Agency – An agency who has signed all UIN agreements and who is actively entering data into the system.

Prospective Partner Agency – An agency who has inquired about joining UNITY.

ROI - Acronym used to refer to a Release of Information which gives permission for client data to be shared.

SSOM – Acronym used to refer to the Self-Sufficiency Outcomes Matrix.

UIN – Acronym used to refer to the UNITY Information Network.

UNITY – The identity given to the Tampa/Hillsborough County's HMIS.

THHI– Acronym used to refer to Tampa Hillsborough Homeless Initiative.

Section 1: Historical Perspective

Introduction

The concept of HMIS was a brainchild of the United States Congress and the Department of Housing and Urban Development (HUD). In 1999, Congress mandated the Department of Housing and Urban Development (HUD) find a way to adequately track the scope of homelessness in the United States in the HUD Appropriations Act. The following year, the Department of Housing and Urban Development (HUD) mandated that each community implement or be in the process of implementation of a Homeless Management Information System (HMIS) by October 2004. The Homeless Management Information System (HMIS) is the national title given to what we call in Hillsborough County the UNITY Information Network (UNITY).

The UNITY Information Network (UNITY) is a secure web-based centralized database where non-profit organizations across Hillsborough County enter, manage, share and report information about the clients that they serve. It is similar to an electronic health record system in a hospital. The UNITY staff provides training and technical assistance to UNITY Partner Agency providers and their users.

In 2005, the Tampa Hillsborough Homeless Initiative became the HMIS lead agency and system administrator for coordinating all HMIS related activity in the Tampa Hillsborough County Continuum of Care (CoC). HMIS activity is governed by an agreement with and monitored by the THHI, the CoC lead agency.

In subsequent years, Senate and House Appropriations Committee reports have reiterated Congress' directive to HUD to: 1) assist communities in implementing local Homeless Management Information Systems (HMIS), and 2) develop an Annual Homeless Assessment Report (AHAR) that is based on HMIS data from a representative sample of communities. Most recently, Congress renewed its support for the HMIS initiative and the AHAR in conjunction with the passage of the Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act of 2006 (PL 109-115).

In addition to Congressional direction, HUD, other federal agencies and the U.S. Interagency Council on Homelessness require HMIS under various statutory authorities and Congressional direction to collect information about the nature and extent of homelessness. Individual programs authorized under the McKinney-Vento Act require the assessment of homeless needs, the provision of services to address those needs, and reporting on the impact of federal assistance in helping homeless people to become more independent. The major congressional imperatives in HUD's McKinney-Vento Act programs are:

- Assessing the service needs of homeless persons;
- Ensuring that services are directed to meeting those needs;
- Assessing the outcomes of these services in enabling homeless persons to become more self-sufficient; and
- Reporting to Congress on the characteristics of homeless persons and effectiveness of federal efforts to address homelessness.

In 2007, the Tampa/Hillsborough Continuum of Care and the UNITY Information Network finally made an advanced move and transitioned from a completely closed, non-sharing database to a completely open shared system. This allows agencies, intake workers, and case managers to see client information entered from any provider across the system. This keeps clients from having to tell their story and give their data multiple times a day.

In 2009, the President signed into legislation the American Reinvestment and Recovery Act (ARRA). That legislation included financial assistance dollars for those at risk of homelessness called the Homeless Prevention and Rapid Re-housing Program (HPRP). In that section, it was written that participating providers who distribute funds must enter and report all data from their local Homeless Management Information System (HMIS).

For the Homelessness Prevention and Rapid Re-Housing Program (HPRP), the American Recovery and Reinvestment Act of 2009 requires that "grantees receiving such assistance shall collect data on the use of the funds awarded and persons served with this assistance in the HUD Homeless Management Information System ("HMIS") or other comparable database."

Our Community's Vision

"Incorporate a system for universal intake, assessment and referral with centralized technology and data systems, such as through the Homeless Management Information System (HMIS)."

The vision to create a centralized health and human service shared client data system is being realized with the growth and development of UNITY which is used to report on client and program successes as well as provide necessary data to local funding entities for health and human service planning purposes.

UNITY Program Goals

Measure the Extent and Nature of Homelessness

The goal is to inform public policy makers about the extent and nature of the homeless population in Hillsborough County, Florida. This is accomplished through analysis of homeless client and service provider data. UNITY gathers an unduplicated count of those accessing services, service trends, bed utilization rates, recidivism rates, and UNITY system usage. All data is provided in an aggregated format (void of any identifying client level information) and made available to public policy makers, service providers, advocates, and consumer representatives.

Streamline the Intake and Referral Process for Human Service Agencies

The goal is to streamline the intake and referral process for human service agencies in Hillsborough County, Florida. UNITY provides a standardized mechanism for collecting client information across all providers. Human service providers collect the same client information and then the client can share that information at each program with additional service providers for greater ease of service. As part of the system, a service provider can send an electronic referral to another agency. This streamlined process allows for the development of centralized intake centers where clients are assessed, appropriately referred to programs, and followed as they use services of various providers who all participate in the singe shared information system.

Provision for In-depth Case Management by Sharing Client Information

The goal is to allow for in-depth case management through the sharing of client information in a centralized system. UNITY provides a standardized mechanism in which human service providers collect information and then share it among every Continuum of Services agency to facilitate client assistance and promote collaboration among partner agencies through the availability of shared data.

Inventory Homeless Housing

The goal is to create a comprehensive inventory of homeless housing and track its usage in Hillsborough County. UNITY is the repository for the inventory that allows for real-time collection and tracking of shelter availability in Hillsborough County. As Case Managers are making referrals, they will be able to check which providers have housing beds/units available to which clients can be referred. In order to maximize the potential effectiveness of the system, it is essential for housing providers to regularly update data in the system. They can then check the system for referrals made to their programs for easy intake.

Section 2: Tampa Hillsborough Homeless Initiative Roles & Responsibilities

Role

The role of the Tampa Hillsborough Homeless Initiative's UNITY Information Network is to act as the Homeless Management Information System (HMIS) Lead Agency for the Tampa/Hillsborough County Continuum of Care. Approval has been granted by the Continuum of Care (CoC) to THHI to act in this capacity within the local Continuum of Care (CoC), State of Florida, and the Department of Housing and Urban Development (HUD) inquiries.

In addition to acting as the HMIS Lead Agency, the UIN role is to provide training and technical support to the Continuum of Care (CoC) Lead Agency and UNITY Partner Agency providers. Lastly, UNITY staff coordinates and participates in numerous projects annually regarding data collection and performance measurement.

The UNITY Information Network (UIN) is more than just a Homeless Management Information System (HMIS); it is a shared client management information system. This system can assist any health and human service organization needing a data system to capture client information, report on their successes and share client data with other partner organizations.

Responsibilities

UNITY Information Network (UIN) is responsible for coordinating the following items on behalf of UNITY Partner Agencies and the Tampa/Hillsborough County Continuum of Care (CoC).

- **All software-related issues with the vendor** - This includes all communication with the vendor including phone, email and conferences as well as submitting feature enhancement requests from UNITY Partner Agencies.
- **User training** - UIN staff is responsible for all End User training. This is to ensure continuity and consistency with training as well as to ensure that the proper workflow for UNITY Partner Agencies is properly taught and followed.
- **Technical support as it relates to the software or project -** UIN staff is responsible for providing technical support to Agency Administrators and End Users. Technical support services attempt to help the user solve specific problems with a product and do not include in-depth training, customization, reporting, or other support services.
- **Committee Liaison** – UIN staff will act as committee liaison to provide technical assistance and guidance to designated committees as necessary.
- **Data quality initiatives -** Together Partner Agencies, CoC lead staff and UIN staff are responsible for adhering to the data quality standards as set forth in the Data Quality Plan in order to ensure that reports both at the provider level and the system level are complete, consistent, accurate, and timely.
- **System-wide reporting on performance measures for Local, State and**

National initiatives - UIN staff is responsible for the training of the UNITY Partner Agency providers on how to access and run reports on the data they contribute to UNITY. Additionally, reports are provided to local community planners monthly and to Statewide and National partners quarterly and annually. This data is in an aggregate format and details the trends on how clients are being served in Hillsborough County.

Client Privacy & Data Security

Client privacy and data security are paramount to a successful collaborative community information system like the UNITY Information Network (UIN). The UIN staff spend time working with our vendor as well as each UNITY Partner Agency to protect clients' data and privacy within the network. UIN continues to refine its policies and procedures to protect client data and strengthen the network. All concerns, complaints and handling of privacy will be handled by the UIN Privacy Officer.

UIN Privacy Officer

Tampa Hillsborough Homeless Initiative has assigned a Privacy Officer to UIN who will outline network risk, monitor client privacy in the system, work on policy and procedure creation to protect client data, work with UIN trainer to improve privacy trainings, and field complaints regarding Privacy and Security violations. The UIN Privacy Officer is the UNITY Program Manager. All concerns about privacy should be sent to unity@thhi.org or call 813-223-6115.

UIN Data Security Officer

Tampa Hillsborough Homeless Initiative has assigned a Data Security Officer to UIN who will monitor system and data security, work to improve security within the network members, and work with UIN trainer to strengthen training around system and data security. The UIN Data Security Officer is the UNITY System Administrator. All concerns about privacy should be sent to unity@thhi.org or call 813-223-6115.

Annual Projects

The UNITY Information Network (UIN) coordinates and/or participates in numerous projects annually regarding data collection and reporting. Below is a list of projects that UIN is involved in:

Housing Inventory Chart (HIC) - An annual report submitted to the Department of Urban Development (HUD) that lists all homeless emergency, transitional, safe haven, shelter plus care, and permanent supportive housing beds in our Continuum of Care (CoC) and how they were used over the reporting period.

Homeless Point in Time (PIT) Count – An annual count and survey of the homeless client population where data is collected on a given day and is

submitted to local, State and Federal Government entities and other community planners. This data is used to estimate the number of homeless in our community and allocate funding based on those estimates.

System Performance Measures – Provide a more complete picture of how well a community is preventing and ending homelessness. Measures include: 1)Length of time persons remain homeless; 2)The extent to which persons who exit homelessness to permanent housing destinations return to homelessness; 3)Number of homeless persons; 4)Jobs and income growth for homeless persons in CoC Program-funded projects; 5)Number of persons who become homeless for the first time; 6)Homelessness prevention and housing placement of persons defined by Category 3 of HUD's homeless definition in CoC Program-funded projects; 7) Successful housing placement.

Longitudinal System Analysis (LSA) -- The LSA data provided by CoCs contains community-level information on people and households served by continuum projects over the course of one year. It includes demographic characteristics like age, race, gender, and veteran status; length of time homeless and patterns of system use; information specific to populations whose needs and/or eligibility for services may differ from the broader homeless population, such as veterans, people and households experiencing chronic homelessness, and others; and housing outcomes for those who exit the homeless services system.

Special Projects and Initiatives – Other reporting projects may occur related to Continuum of Care special projects and initiatives. Continuum of Care initiatives are coordinated efforts to rapidly rehouse persons experiencing homelessness by addressing the needs of specific subpopulations and providing the wrap around services needed for people to maintain their housing. These initiatives rely on HMIS tracking and reporting to demonstrate their impact.

Section 3: UNITY Partner Agency Role & Responsibilities

"UNITY Partner Agency" is the term given by the UIN staff to participating health care and/or human service providers who actively enter data into the UNITY Information Network (UIN).

Participation Requirements

Policy 3.1: All prospective health and human service providers who join UIN must sign and agree to abide by the UIN-related user and agency registration forms and policies.

> **Policy 3.1.1:** A service provider whose primary mission involves addressing the issue of homelessness is required to actively enter data in the UIN.
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> **Procedure:** Any 501(c)3 organization whose primary mission involves addressing the issue of homelessness is required to actively enter data in the UIN. To participate in UIN, Partner Agencies must sign and agree to abide by the terms of all agency and user-related UIN forms and policies and procedures outlined in this document.
>
> All Partner Agencies that receive funding from the United States Housing and Urban Development Department (HUD) or Department of Veteran Affairs (VA) funded Supportive Services for Veteran Families (SSVF) programs are mandated to participate in UIN by contract with the federal partners.
>
> Partner agencies may be required by their funders to enter data in to the UIN.
>
> **Policy 3.1.2:** A service provider whose primary mission is not homeless related, but who provides a basic needs, prevention, diversion, or wrap around service is strongly encouraged to actively enter data in the UIN.
>
> **Procedure:** Any organization that provides a health and human service may qualify to participate in UIN. To participate in UIN, Partner Agencies must sign and agree to abide by the terms of all agency and user-related UIN forms and policies and procedures outlined in this document. Participation is voluntary, but strongly encouraged. A fee may be assessed per user to access and enter data into UIN.

UNITY Partner Agency Agreement

Policy 3.2: The UNITY Partner Agency Agreement must be signed by a legal authorized representative of each UNITY Partner Agency.

Document: The UNITY Partner Agency Agreement is a legal contract between the UNITY Partner Agency and the Tampa Hillsborough Homeless Initiative regarding specific UIN guidelines and use. The agreement outlines specific details about the UNITY Partner Agency's UIN involvement including, but not limited to, the areas of confidentiality, data entry, security, data quality and reporting.

Procedure for Execution:

1. The Agency's Executive Director (or legal authorized officer) will sign two copies of the UNITY Partner Agency Agreement and mail them to THHI.
2. Upon receipt of the signed agreement, it will be signed by the THHI Executive Director.
3. Upon signature of the THHI Executive Director, one copy of the UNITY Partner Agency agreement will be scanned and filed electronically with THHI. The original will be mailed back to the UNITY Partner Agency

HIPAA Agreement

Policy 3.3: The UNITY Business Associate or Business Associate/Qualified Service Organization Agreement, along with the UNITY Partner Agency Agreement must be signed by the Executive Director (or a legal authorized representative) of each UNITY Partner Agency that identifies as a HIPAA covered entity.

Procedure: The UNITY Business Associate or Business Associate/Qualified Service Organization Agreement is a UIN document required by all UNITY Partner Agency providers who partner with UIN and are a HIPAA covered entity. This document details the basic business practices of the HIPAA rules to be followed. The document further explains that each UNITY Partner Agency may be working with other UNITY Partner Agency providers who are HIPAA covered entities. Therefore, all UNITY End Users will adhere to the basic business practices under HIPAA as it relates to client confidentiality, privacy and security.

1. The Agency's Executive Director (or legal authorized officer) will sign two copies of the UNITY Business Associate or Business Associate/Qualified Service Organization Agreement and mail them to THHI.
2. Upon receipt of the signed document, it will be signed by the THHI Executive Director.
3. One copy of the UNITY Business Associate or Business Associate/ Qualified Service Organization Agreement will be scanned and filed electronically with THHI and the original copy will be mailed back to the Agency.

Background Checks

Policy 3.4: In order to receive UNITY license access, each UNITY User must have completed and passed a background check prior to attending their first UNITY training to ensure that clients are protected from fraud or identity theft.

Procedure: The Tampa/Hillsborough County Continuum of Care (CoC) requires all end users of the UNITY system to complete and pass a level two background check. The HMIS Lead Agency (THHI) must verify that each UNITY Partner Agency conducts a criminal background check for all UNITY users. Additionally, the Florida Legislature has passed a law, effective August 01, 2010, that places new requirements on persons who work with vulnerable populations (children, elderly, and the disabled). This law, part of 2011 Florida Statute, XXXI, Section 435 regarding labor background changes, has been adopted by the Department of Children and Families (DCF), Agency for Health Care Administration (AHCA), Department of Elder Affairs, and Florida Department of Law Enforcement.

This new law requires that employees and volunteers who work with vulnerable populations undergo and pass a level 2 background check including fingerprinting prior to beginning work. Since UNITY is a shared client information system, each UNITY user must have completed and passed a level 2 background check prior to attending their first UNITY training to ensure that clients are protected from fraud and identity theft.

In order to secure the shared client data in UNITY, we encourage each organization to follow this new law for all users who have access to UNITY data. By law, we cannot ask for a copy of the results as proof of completion, therefore, each individual user will certify they have had and passed their level 2 background check during basic user training.

EXCEPTIONS: In rare circumstances, a service provider may not be able to obtain level 2 background checks for their employees and/or volunteers. Service providers who do not meet FDLE criteria to obtain level 2 background checks for employees and/or volunteers may request an exception to the background checking standard. HMIS Lead staff will consider exceptions to the level 2 background check standard for organizations on a case-by-case basis, prior to executing a UNITY Partner Agency Agreement. Exceptions will **only** be considered in rare situations when the organization:

- Is an organization/service provider whose primary mission involves addressing the issue of homelessness; AND
- Is not already required by law to perform state and national criminal history checks on employees or volunteers, AND

- Has been advised by the Florida Department of Law Enforcement (FDLE) that they do not meet criteria to obtain level 2 background checks.

If an exception is granted, the background check standard agreed upon during the exception review will be detailed in the organization's UNITY Partner Agency Agreement. Agencies meeting this exception will be required to have their employees and/or volunteers successfully complete the following criteria:

- State of Florida criminal history check, available at:
  https://cchinet.fdle.state.fl.us/search/app/default?31
- Complete and sign an Affidavit of Good Moral Character
- Complete an employment background check

HMIS Lead Staff will continue to be diligent in protecting clients from fraud and identity theft be encouraging organizations to adopt the most thorough background check standard possible.

Licensing Fees

Policy 3.5: The UNITY Information Network (UIN) will monitor and assess licensing fees for all existing and future UNITY Partner Agencies.

Policy 3.5.1: The UNITY Information Network (UIN) will provide subsidized licenses to UIN staff and UNITY Partner Agencies:

- whose program mission is to end homelessness;
- whose target population served is homeless;
- whose agency actively participates in Coordinated Entry as an access point

Objective: Basic need services that will be eligible for subsidized licenses in UNITY are categorized as follows:

- food - soup kitchen, food pantry, and food banks.
- homeless diversion - financial assistance providers who help current homeless individuals and families (defined by the HEARTH Act) exit to permanent housing (i.e. rapid re-housing or homeless prevention).
- housing/shelter - homeless emergency shelter, transitional housing, or permanent supportive housing listed in the housing inventory chart.
- clothing/drop-in center - a one stop center where a variety of basic needs are given such as telephone use, mailing address, clothing, computer use, showers, laundry, etc. or small organization whose mission is to provide clothes to homeless children.
- homeless street outreach - teams who contact and engage with homeless clients on the street or in local emergency or transitional facilities.

- homeless child care slots - dedicated programs that provide child care only to homeless children and families.
- Travelers Aid – funds for transportation assistance for clients returning home.

Each UNITY Agency Administrator will receive a subsidized license. Additionally, three subsidized licenses per project or service physical location will be granted, if needed. Additional subsidized licenses can be requested through the UIN staff to the UNITY Advisory Committee. Subsidized licenses will be granted upon a case by case basis by the HMIS Advisory Committee if there are subsidized licenses available.

Procedure:

1. Upon beginning participation in UIN, the organization, programs and services will be assessed for licensing fees.
2. If they meet the criteria above for subsidized licenses, UIN staff will generate a letter of leveraging outlining the license gift.
3. Licenses available in the subsidized pool will be granted for programs and services meeting the above criteria.
4. Users who enter data into the system under multiple programs where one program qualifies for a subsidized license and one program does not, the user will be required to follow policy 3.5.2.
5. All other organizations, program and services not meeting the above criteria will be required to follow policy 3.5.2.
6. For programs or services that need additional subsidized licenses, the Agency Administrator can make a request for additional subsidized licenses through the UIN HelpDesk (support@unityofhc.zendesk.com). Each request will be presented at the following UNITY Advisory Committee meeting for review and consideration. If the request is denied, the program or service will be invoiced for payment for their request as stated in 3.5.2.
7. When requests are approved, the UIN HelpDesk will update the ticket of the license availability. The UIN Trainer will then contact the program or service about training.
8. If a program or service does not need all the subsidized licenses allocated to them, they may return the surplus licenses to UIN for redistribution through the UIN HelpDesk. Licenses may be requested at a later date and, upon availability, reallocated back.
9. If subsidized licenses are allocated, but remain unassigned or the user assigned does not log into the system for 90 days or more, UIN staff will send a notification to the UNITY Agency Administrator about the potential license reallocation. The UNITY Advisory Committee will consider reinstatement on a case by case basis. Agency Administrator will notify UIN staff by submitting a ZenDesk ticket, if an end user will have an extended absence.
10. Any program or service that receives subsidized licenses, and at license renewal time must be in compliance with data quality plan. The

consideration of eligibility for a subsidized license will be assessed for possible reinstatement by the UNITY Advisory Committee on a case by case basis.

11. If a program receives subsidized licenses and no longer participates in Coordinated Entry, licensing fees will be reassessed.

Policy 3.5.2: The UNITY Information Network (UIN) will assess a licensing fee to UNITY Partner Agencies whose do not meet the criteria in 3.5.1 for a subsidized license.

Objective: The UNITY Advisory Committee in conjunction with the Tampa/Hillsborough County CoC Lead agency has developed the following fee structure for the UIN system. Each UNITY Partner Agency is required to pay any associated fees listed below for licenses requested. The fees listed below are non-negotiable and non-refundable. The fees listed below are for a 12 month period ending one year from the date of payment receipt.

Item	Description	Fee
New License	There is a one-time setup fee ($250/user), annual license fee ($92/user) plus an admin rate ($33/user) to purchase a new license for UNITY. Fees are per user.	$390/user
Annual License Renewal	There is an annual license fee ($92/user) plus an admin rate ($33/user). Fees are per user.	$135/user
Reporting License	There is an annual license fee associated with accessing the Advanced Reporting Tool ($181/Adhoc license or $98/Viewer license).	$181/adhoc license OR $98/viewer license
Vendor Assisted Reports, System Changes, or Technical Assistance	There is a fee for support from the vendor to create any new report. Fees are per report at the current vendor rate. Rates subject to change without notice. Will require upfront deposit to spec out report. Upfront dollars goes towards balance of report project.	$125/hour

Procedure:

1. Upon beginning participation in UIN, the organization, programs and services will be assessed for licensing fees.
2. Organizations who are currently receiving subsidized licenses and no longer meet the criteria above for a subsidized licenses (Policy 3.5.1), will be sent an invoice for payment of existing licenses in the new contract year.
3. The HMIS Lead agency finance department will generate an Invoice for Payment and send it to the program or services making the licensing request.
4. Partner agency must submit payment within 60 days of receipt of invoice. If payment is not received within 60 days, license may be suspended and/or revoked.
5. The Agency Administrator can make a request for additional non-subsidized licenses through the UIN HelpDesk (support@unityofhc.zendesk.com). An invoice will be generated for payment.

Agency Staff Roles and Requirements

Policy 3.6: Each UNITY Partner Agency is required to have an Agency Administrator to coordinate UNITY activities for their organization.

Policy 3.6.1: Partner Agencies will assign both an Agency Administrator and may have a back-up Agency Administrator to coordinate UNITY activities for their organization.

Procedure: The Executive Director (or legal authorized officer) of the Agency will complete Addendum A to assign the position to a specific staff person. This role is vital to the success of UNITY at the UNITY Partner Agency locations to ensure that the data is entered in a timely manner, the quality of the data is continuously monitored, and communication and support between UIN and the UNITY Partner Agency is streamlined.

An Agency Administrator is the staff member at a UNITY Partner Agency provider who acts as the centralized contact for the UIN staff and is the first line of defense for technical assistance to their users.

Agency Administrator Role and Responsibility. The Agency Administrator role is to act as the operating manager/liaison between the UIN staff and users at the UNITY Partner Agency. This position is necessary for the UIN staff to have a point of contact and vital to the success of UNITY at the UNITY Partner Agency. This position is required for all Partner Agencies. The CEO/President or Executive Director will designate an agency administrator based on a set of skills outlined in the UNITY Partner Agency Agreement, Addendum A.

Policy 3.7: A UNITY Partner Agency will ensure that at least one person will complete a Level 1 training in order to receive a license to access live client data in UNITY.

Procedure: Once the Agency Administrator position has been assigned, they will be able to work with UIN Staff to assign End Users and authorize additional licenses for the UNITY Partner Agency. The End User will complete training and then be responsible for the timeliness of the data being entered and the quality of the data they enter.

An End User is a term used to refer to all UNITY users at a UNITY Partner Agency.

UNITY End Users Roles and Responsibility. Every UNITY End User must attend at least one Basic User Training and sign a UNITY User Agreement in order to receive access to the live site.

Every UNITY End User is responsible for the following items:

- Adhering to all of the policy and procedures outlined in this document and in the Tampa/Hillsborough County CoC's Data Quality Plan.
- Attending all trainings required by UIN staff and the UNITY Partner Agency Administrator.
- Entering quality data in a timely and accurate manner, in accordance with the Data Quality Plan.

Initial UNITY Staff Site Visit

Policy 3.8: Prior to signing the UIN agreements, a prospective UNITY Partner Agency will first schedule and complete an on-site Initial UNITY Site Visit at the prospective Member Agency.

Procedure: Prior to signing the Agreements for participation, a prospective UNITY Partner Agency provider will first schedule and complete an on-site Initial UNITY site visit at the prospective Member Agency. This site visit is between the UIN staff, the prospective UNITY Partner Agency Executive Director or designee and other UNITY Partner Agency critical staff at the prospective UNITY Partner Agency location. Other staff may include data entry staff, supervisors, managers, intake workers, or case managers. The prospective UNITY Partner Agency should include any staff they feel is necessary to UNITY data entry, data quality or the reporting process.

At this site visit, UIN staff will document the goals of the prospective UNITY Partner Agency in regards to UNITY (what do they want to achieve by using the system), go over the required data elements, review the policy and procedures, define entry requirements and set expectations. The site visit also allows UIN staff to properly assess the prospective UNITY Partner Agency providers' workflow and user needs, specific implementation issues, and any constraints or risks that will need to be mitigated by the prospective UNITY Partner Agency prior to going live. A site demo using a training version of the UNITY system may also be used (at UIN staff discretion) during the visit to visually explain UNITY and its capabilities.

Minimal Technical Requirements

Policy 3.9: All UNITY End User workstations must meet minimum technical requirements in order for UNITY to be functional and to meet the required security specifications.

Procedure: The following details are the minimal set of technical requirements for hardware and Internet connectivity to the UNITY system. UNITY works with all operating systems.

Hardware:
- Memory: 4 Gig recommended, (2 Gig minimum), If XP – 2 Gig recommended, (1 Gig minimum)
- Monitor: Screen Display - 1024 by 768 (XGA)
- Processor: A Dual-Core processor is recommended.

Internet Connectivity:
- Broadband Internet Connectivity recommended (High Speed Internet).

Authorized Browsers:
- Firefox 3.5 or greater
- Internet Explorer 8.0 or greater
- Safari 4.0 or greater
- Google Chrome 5.0 or greater

Workstation Maintenance:
- Workstations should have their caches refreshed on a regular basis to allow for proper speed and functionality.
- Workstations should continue to be updated to the most current version of Java, as suggested by their software.
- Workstations may need their virtual memory increased.

UNITY Corrective Action

Policy 3.10: Once a UNITY Member Agency or any of its End Users has violated any UNITY policy, the UNITY Staff will implement a corrective action plan upon discovery of the violation.

Procedure: Violations in UNITY policy can occur, but Partner Agencies should work to ensure violations in policy are prohibited. Partner Agencies should, upon discovery of a violation, notify UNITY staff of the violation. When a violation is discovered, it is the role of the UNITY staff to swiftly respond in order to prevent further violations from occurring or the current violation from harming clients or other UNITY Partner Agencies. The UNITY staff will determine a course of action depending on the type and the severity of the policy violation.

Critical Risks (For example: Security Breach, Imminent risk to clients, Unresolved Data

Quality Errors)

- UNITY Staff will suspend all UNITY Partner Agency Active End User Licenses. Affected End Users will be suspended until retraining.
- UNITY Staff immediately reports the violation to the HMIS Lead Agency Management Team.
- UNITY Staff will contact the UNITY Partner Agency in question to discuss the violation and course of action.
- UNITY Partner Agency will be suspended until violation resolved and placed on probation for at least 90 days.
- HMIS Lead agency Management will contact the UNITY Partner Agency to discuss violation and action plan.

Medium Risks (For example: Grievance has been filed against UNITY Partner Agency or general complaints that threaten or endanger clients.)

- Agency Administrator immediately contacts and reports to the UNITY Staff to discuss the course of action and plan.
- UNITY Staff will contact the UNITY Partner Agency in question to discuss the violation and course of action.
- HMIS Lead Agency Management will contact the UNITY Partner Agency to discuss violation and action plan.
- UNITY Partner Agency will be placed on Probation for at least 90 days and possible suspension until violation resolved.
- If appropriate, UNITY System Administrator will suspend all UNITY Partner Agency Active End User Licenses.

Low Risks (For example: Unresponsive UNITY Partner Agency to UNITY Requests, Ceased Data Entry, Incorrect Bed List, End User Inactivity, and Timeliness Issues.)

- UNITY Staff will contact the UNITY Partner Agency in question to discuss the violation and course of action.
- If appropriate, UNITY Partner Agency will be placed on probation for at least 90 days or until violation resolved.
- If appropriate, UNITY System Administrator will suspend all or some of the UNITY Partner Agency End User Licenses in question.
- If appropriate, UNITY Staff will contact the funder(s) associated with the UNITY Partner Agency to discuss the violation and course of action.

Potential Courses of Action

Probation.
The UNITY Program Manager will notify the Agency's Executive Director and UNITY Agency Administrator in writing to set up a one-on-one meeting to discuss the violation in question. During the Meeting, an action plan will be developed and

documented with relevant time frames outlined set to correct actions. If a training issue is identified, the UNITY Program Manager will coordinate further follow up with the End Users in question. The Partner Agency will be placed on probation, to last a minimum of 90 days. Monitoring and auditing will be performed regularly during this period. Notification of probation will be communicated to all local contract funding managers.

Suspension.

If a violation is of critical risk or the corrective measure(s) are not achieved in the probationary period or more UNITY violations occur during the probationary period, the UNITY System Administrator will suspend their access to UNITY until the issues are resolved. The UNITY Partner Agency will receive a written notice, via certified mail, to the Partner Agency's Executive Director, of the suspension, reasons and effective date. During suspension, a mandatory meeting will be held between the Partner Agency Executive Director, HMIS Lead agency CEO, the UNITY Staff, and local Contract Manager, if appropriate, to discuss suspension and requirements for resolution. All meeting deliverables will be documented in writing and must be achieved within the set probationary period.

Termination.

If the Partner Agency violates any policies deemed of critical risk and fails to achieve resolution within the probation period, the UNITY Staff will permanently terminate the Partner Agency from UNITY. The UNITY Partner Agency will receive an official notice, to the Partner Agency Executive Director of the Termination, reasons and effective date. Notification of the termination will be sent to all local contract managers. In the case there are any costs, e.g. data quality costs, transfer costs, associated with the termination, the Partner Agency will assume responsibility for payment.

Reinstatement Policy

The CoC Lead Agency (Tampa Hillsborough Homeless Initiative [THHI]) has developed and approved a Policy and Procedures manual for organizations that access data in UNITY. Any organization that is approved as a UNITY Partner Agency receives a copy of the UNITY Policy and Procedures Manual. The Executive Management of each organization must sign a statement that they have received and read the UNITY Policy and Procedures Manual and agree to adhere to them. Violations of the UNITY Policies and Procedures will result in probation and may result in suspension or termination from the UNITY system, especially violations of those policies requiring:

- initial training and periodic re-training in using UNITY for persons entering and accessing data;
- staff members that enter and/or access data must meet the background check requirements with no past criminal records involving fraud or credit/identification theft;
- staff or volunteers must not be a current client of the UNITY member program in which they are entering data, and may not have been enrolled in a program of the UNITY Partner Agency within the previous six months.

Programs may also be placed on probation, suspension or termination from the UNITY system for criminal or illegal activity in which a client's rights, privacy, safety or security have been violated. Those violations are the most serious of all, must be addressed immediately, and take precedence for resolution over all other violations.

Policy: Organizations that have been placed on probation, suspension, or termination from the UNITY Information Network and who seek to be returned to full active UNITY Partner Agency status must complete the reinstatement process outlined below, and be granted approval for probationary reinstatement prior to the organization and any of its users being granted access to UNITY.

Procedure: A UNITY Partner Agency will be placed on probation, suspended, or terminated from UNITY for any violation of the UNITY Policies and Procedures. The decision to place on probation, suspend, or terminate from UNITY will be made by the UNITY Staff, who will officially notify the Partner Agency of the action. The UNITY Partner Agency on suspension or termination will be placed on inactive UNITY Partner Agency status. The UNITY Partner Agency that has been placed on probation, suspended, or terminated from the use of and access to UNITY under this Policy may be considered for reinstatement after completing the following process.

1. The UNITY Partner Agency must create a Corrective Action Plan that addresses each and every issue listed in the official notification of probation, suspension or termination from UNITY, and submit it to the UNITY Staff for review, negotiation, and approval.

2. The UNITY Partner Agency must demonstrate in writing and through desk and on-site monitoring that it has taken the actions needed to resolve all violations named in the Corrective Action Plan, and that it has ceased any and all specific activities or actions that violated the approved UNITY Policies and Procedures. Desk and on-site monitoring for quality and timeliness of data entry will be done by UNITY Staff, with the support of CoC Lead Staff.

3. Each specific activity or action that was in violation of the UNITY Policies and Procedures will be considered separately with separate written and on-site monitoring of the violations.

4. Once the Corrective Action Plan has been completed and all violations addressed and resolved by the UNITY Partner Agency, the organization must formally request reinstatement in writing to the UNITY Staff for their consideration. UNITY Staff will review the reinstatement request and make a recommendation to the HMIS Lead Agency. Final approval and course of action for reinstatement is given by the HMIS Lead Agency.

5. All required organization personnel (Agency Administrator and all licensed end users entering or accessing data) must complete all required/appropriate training presented by UNITY staff prior to final reinstatement or the lifting of probation, suspension or termination status.

6. Violations regarding criminal or illegal activity in which any client's rights, privacy, safety or security has been violated, will take precedence over all other violations. If the UNITY Partner Agency has been placed on probation, suspended or terminated for criminal or illegal activity, those violations must be remedied before other violations of UNITY Policies and Procedures are addressed.

7. After the UNITY Partner Agency has been reinstated, it will be on probation for six months from the day it begins entering and accessing data in the UNITY system. Additionally, the organization will be subject to greater scrutiny and monitoring during the probationary period and must demonstrate on-going change in adhering to the UNITY Policies and Procedures prior to probation being lifted.

8. UNITY Staff will make the final decision for lifting of the probationary status and will notify the CoC Lead agency for final action.

End to Courses of Action

Once the UNITY Partner Agency has been re-instated to UNITY by the HMIS Advisory Committee and CoC Lead agency, UNITY staff will re-instate the Partner Agency's access to the UNITY system and place them under a 12-month probationary period. All users who were previously suspended or terminated and/or who have not accessed the system in 90 days or more will be required to attend, at a minimum, a Level 1 refresher training.

Section 4: User Administration

UNITY End User Prerequisites

Policy 4.1: All End Users are required to have a minimum set of basic computer competency/skills to adequately perform their data entry roles in UNITY.

Procedure: Each UNITY Partner Agency Administrator and all other End Users should be prepared with basic computer competency/skills to adequately use and navigate UNITY. Users will be evaluated for competency at the beginning of training. Users who do not have a minimum competency will be asked to leave training and seek a basic competency class. Basic computer competency classes can be found at a local library, community center, college, or business learning center. Once the user has completed the basic competency class, they can register and attend UNITY training. Upon return, they will be required to produce proof of attendance at the basic computing class.

Policy 4.2: All End Users will have had a Level II Background Check or granted an exception by the Lead HMIS Agency prior to being assigned access to UNITY.

Procedure: UNITY Partner Agency providers are encouraged to have background checks on all staff and volunteers prior to assigning them access to UNITY. UNITY Partner Agencies shall review the received criminal history report before the end user signs-up for UNITY training. Background checks that come back with a criminal history

should be carefully considered prior to giving them access to client information. UNITY staff will investigate all potential UNITY users' history for violations and current client status prior to assigning a license or approving someone for training. Those potential UNITY End Users and Agency Administrator will be notified in writing if they do not meet the qualifications to be granted UNITY access. **See policy 4.3 for more information.**

UNITY End User Agreement

Policy 4.3: No prospective end user will be given a license for UNITY if they have entered a plea of nolo contendere (no contest) or been found guilty of any fraud (including identity theft or computer related crimes) or stalking-related felony crimes punishable by imprisonment of one year or more in any state.

Procedure: An End User will be denied UNITY access if they meet any of the following, whether a judgment of guilt was withheld or not:

- has entered **a plea of nolo contendere** (no contest) to a fraud or stalking-related felony crime (fraud, identity theft, stalking) punishable by imprisonment of one year or more.

- has entered **a plea of guilty** to a fraud or stalking-related felony crime (fraud, identity theft, stalking) punishable by imprisonment of one year or more for crimes concerning.

- has **been convicted or found guilty** of a fraud or stalking-related felony crime (fraud, identity theft, stalking) punishable by imprisonment of one year or more for crimes.

  This policy will be taken under consideration and possibly waived if the prospective user has passed a Level II Background Check.

Policy 4.4: Any prospective end user who is/was a current or previous client of the same program in which they now intend to work or volunteer must not have resided at the facility or been a program participant in the last 6 months prior to gaining access to UNITY.

Procedure: The end user for residential/homeless service programs must not have been a previous client of the same program in which they now intend to work or volunteer for the last 6 months prior to gaining access to UNITY. UNITY Partner Agencies who violate this rule are putting client information at risk of a privacy and confidentiality breach. Upon discovery of this practice within a Partner Agency, UNITY staff will immediately inactivate the end user in question and notify the agency administrator and end user of the inactivation in writing. Exceptions to this policy should be submitted in writing and will be considered on a case-by-case basis by UNITY Staff.

Policy 4.5 All End Users must be provided with a software license by and provided training through the UNITY staff prior to entering or accessing client data in UNITY.

Procedure: Due to the amount of personally identifying information and the confidential nature of the UNITY System, every end user must be assigned a software license to access the system and their initial training must come from the UNITY staff. In order to receive a license, a potential end user must not violate UNITY policies 4.0 through 4.4. Furthermore, a condition of being granted a license is that all users must sign and adhere to an End User Agreement. This document outlines the role and responsibility of having and maintaining their access in UNITY. An End User who violates the End User Agreement will be immediately inactivated from UNITY and required to attend re-training to re-gain access.

License Administration

Policy 4.6: Notification of issuance and revocation of access within the UNITY Information Network (UNITY) is the responsibility of Agency Administrator.

Procedure: Agency Administrators are responsible for notifying the UNITY staff of a new user, change in user access, or deletion of user access within 24 business hours of their organization's needed change to UNITY access. Agency Administrators that have attended Administrator training may remove End User access as appropriate. Agency Administrators work with the UNITY staff to ensure proper license access is given to qualified UNITY End Users. However, issuance, maintenance, and revocation of software license within the UNITY Information Network (UNITY) is the sole responsibility of UNITY staff.

Assignment of End User security settings. The UNITY staff will assign the security level of every End User based on the agreed-upon security settings established by the Member Agency at the Initial UNITY site visit. The Agency Administrator or Executive Director will assign access to individuals based on their role in the organization and needed access to UNITY. Assignments are best organized by the lowest level of security the staff or volunteer member would need to perform their normal work duties as defined by their official job/position description. If the user is to remain on the system, but has had a change in responsibilities, an Agency Administrator or Executive Director may request a change in any End User's security setting, at any time, by submitting a request form through ZenDesk.

Additional licenses/changes. All requests for new licenses must be submitted through ZenDesk by the UNITY Partner Agency Administrator. Requests must be received and approved no later than 72 hours before the scheduled training date. All new licenses are issued only after a UNITY Partner Agency agreement and HIPAA Agreement have been signed by the UNITY Partner Agency and the UNITY End User Agreement has been signed by the appropriate End User. Licenses are allocated on a first-come,first-served basis based upon agency size, use, and adherence to all policies and procedures set forth in this document. All requests will be reviewed and

rated for allocation by the HMIS Lead agency. If there are no more licenses available, the user will have to wait until a license is available or unless the UNITY Partner Agency is willing to pay for the license activation.

Inactivity. An End User must successfully complete Basic User training, log in within 5 business days, and allow no more than 60 days between log in sessions on the live site to keep their license active. Any End User who is in violation of these rules will have their access inactivated by UNITY staff immediately and the user will be required to attend re-training prior to regaining access. They may be charged a license fee. If a license is no longer needed by the Partner Agency, it will be distributed to the pool of available licenses open to all UNITY Partner Agency providers. An inactivity report is generated and shared with the Agency Administrator, Continuum of Care, local government entities, Funders, and other community stakeholders.

UNITY Staff removing a user license for cause. UNITY reserves the right to immediately inactivate or delete the license for any end user for cause. In all cases where a licensee is removed for cause, the assigned UNITY Partner Agency Administrator and Executive Director will be notified immediately via email with the stated cause of license removal. Reasons that a licensee would lose their license or otherwise have their license temporarily inactivated or revoked would include, but not be limited to:

- Multiple failed login attempts in the same day.
- A consistent lack of good data quality.
- Failure to log in within the 5 day period post training.
- Two consecutive "no call, no shows" to scheduled training.
- Failure to log on to system at least once in a consecutive 60 day period.
- Sharing system credentials (login and password) with any other party.
- Failure to pass a Level II Background Check at any time.
- Violation of client privacy or security (i.e. verbally disclosing client personal data, allowing non-authorized users to view any data from, have access to, see the screens of, or be provided any print-outs of client data from UNITY.)
- Other violations of these UNITY Policies.
- Other serious infractions that result in a compromise of the UNITY Member Agency and/or any client level data in the system.

Agency removing a user license. An End User license can only be deactivated by UNITY staff or Agency Administrator. Requests for removal of a license by a UNITY Partner Agency can only come from the Agency Administrator or Executive Director and the request must be submitted in writing through ZenDesk. All license requests should be communicated to UNITY within 24 business hours after the End User has left the employment of the UNITY Partner Agency, the End User has changed positions

and is no longer in need of UNITY access, or has knowingly breached or is suspected of a system breach where client data has been compromised. Terminations should be submitted using ZenDesk.

Changes in User Access

Policy 4.8: A UNITY User status will change in the system based on the change in status of the UNITY Partner Agency due to violations of the UNITY Policies and Procedures.

Procedure: A user is a direct reflection of the UNITY Partner Agency and vice versa. They work in tandem to provide services to clients and manage quality of the data entered into the system. Therefore, when a UNITY Partner Agency Status changes so will each user status. The status will change upon formal approval from the HMIS Lead Agency. .

Policy 4.8.1: A UNITY User can be placed on probation with just cause from the UNITY System for any violation of the UNITY Policies and Procedures.

Procedure: If a user is in violation of any UNITY policy and procedure and it is not found to be an offense worthy of suspension or termination by the HMIS Lead Agency, the user will be placed on probation in the system. Furthermore, when a user is placed on probation, the UNITY Partner Agency is also placed on probation and a Corrective Action Plan will be warranted.

Policy 4.8.2: A UNITY User can be suspended or terminated with just cause from the UNITY System for any violation of the UNITY Policies and Procedures.

Procedure: If a user is in violation of any UNITY policy and procedure and/or local, state or federal laws, the user will be suspended or terminated from the system. Furthermore, if the UNITY Partner Agency is placed on corrective action and recommended for suspension or termination from the UNITY system, all user access will also be suspended or terminated immediately.

Policy 4.8.3: A UNITY User can be suspended or terminated from the UNITY System if the user has had ongoing data quality errors related to completeness, accuracy and timeliness.

Procedure: If any user hasongoing data quality errors and is not in compliance with the Data Quality Plan, the user may be suspended or terminated from the UNITY system. If this occurs, the user will be required to attend a refresher retraining and pass a test prior to regaining access. If more than one user is affected, then the organization may be placed on corrective action.

Policy 4.8.4: Any UNITY Member Agency who fails to pay any associated UNITY fees within 60 days may have all users suspended from the system until payment is

received.

Procedure: The UNITY Advisory Committee and CoC Lead agency has worked together to establish a UNITY Licensing Policy (Policy 3.5). This policy has been set to establish baseline payment for services and licenses provided by the UNITY information Network. Any UNITY Partner Agency who fails to pay accrued associated fees within 60 days of the generated invoice date may have all users suspended from the system until payment is received. Accrued fees can be, but are not limited to, license renewals, training, and report generation by the UNITY staff. Any disputes in payment should be made to the CEO of the HMIS Lead agency (THHI).

Law Enforcement Access

Policy 4.9: No active member of law enforcement or detention and corrections staff will be an authorized End User of UNITY unless directly assigned as an officer to the homeless initiative.

Procedure: Active members of law enforcement shall not be granted access to UNITY, for the purpose of protecting current clients who may be accessing health and human service programs from harassment or harm. Limited exceptions may be negotiated and an agreement executed with the HMIS Lead agency concurrent to an agency's direct involvement in an active homeless outreach or jail diversion and/or prison release program. Any agreement with exceptions must include a statement that: UNITY use is (1) limited to the purpose for which it was intended; and (2) is only for work with program-involved clients.

UNITY staff works with law enforcement to ensure accurate data collection for unsheltered homeless clients. Law enforcement may utilize UNITY to add or update client information, complete Coordinated Entry assessments, and record services.

UNITY staff will provide law enforcement information related to evidence and information gathering concerning a criminal matter via Court Order, such as a search warrant or subpoena. UNITY staff will assist State Probation and Parole officials searching for individuals who are in violation of the probationary statutes.

Section 5: Clients' Rights

Client Consent

Policy 5.1: A UNITY Member Agency must obtain consent from all clients for whom they are entering or accessing client data into UNITY.

Procedure: No client shall be entered into UNITY without obtaining the client's consent for their information to be entered or accessed in UNITY. Consent and Authorization to

Release Information forms must be scanned and added to the client record in UNITY under the file attachments section. All consent procedures will be compliant with the HMIS Data and Technical Standards.

Consent and Authorization to Release Information (ROI). UNITY Partner Agencies are required to obtain written consent to authorize the sharing of client information with other UNITY Partner Agencies and CoC Member Agencies. The UNITY Consent and Authorization to Release Information form is used to record a client's authorization for their data to be shared with other UNITY Partner Agencies and CoC Member Agencies. The following UNITY procedures should be followed to remain in compliance.

- Member Agencies are required to use the UNITY Consent and Authorization to Release Information form provided.
- The original signed form must be uploaded and saved in the client's UNITY record by the UNITY Partner Agency. Once the signed Release is saved in a client's UNITY record, the paper form may be appropriately discarded or securely stored and protected from loss or theft.
- After it expires all clients still receiving services will need to sign another UNITY Consent Authorization to Release Information form and the new form will need to be uploaded and saved in UNITY.
- UNITY End Users should strive to communicate the release in a language the client understands.
- The form must be signed by each member of the household receiving services who is over the age of 18. The head of the household may sign for any children or members of the household under the age of 18 on a separate form.
- It is important to understand agencies cannot deny services to individuals solely on the basis of the individual deciding not to share information in UNITY.
- If the client requests a copy of the data record entered into UNITY, the UNITY Partner Agency Administrator is required to provide the copy to the client.

Client Access to UNITY Information

Policy 5.2: All clients entered into UNITY have a right to know who has accessed their information and obtain a copy of their electronic file contained in the UNITY Information Network.

Procedure: The UNITY Partner Agency must provide the client a copy of their full UNITY record including service transactions, case notes and other comments upon request. The client must make the request in writing through email or regular mail. Once the request is received, a UNITY Member Agency Administrator:

1. should validate the client making the request is the correct client in UNITY by matching names, social security number and other demographic information to ensure privacy of the information.
2. will request assistance from the HMIS Lead Agency with this matter.
3. should provide a copy of the client record entered into the system including, but not limited to, case notes and service transactions.

4. may provide, if requested, an audit trail of who at the organization has viewed or edited the client record over the course of service at the organization.
5. shall fulfill the client's request within 7 to 10 business days.

Upon review of the record by the client, the client can request that changes to the record be made. If this is the case, the UNITY Partner Agency should make the necessary changes and add a note to the system outlining the changes requested by the client.

Filing a Grievance

Policy 5.3: Clients have the right to file a grievance with the UNITY staff about any UNITY Partner Agency related to violations of data access in UNITY, violations of UNITY policies and procedures, or data discrepancies

Procedure: UNITY staff will review a grievance against any UNITY Partner Agency related to the items above. UNITY staff will contact the client by phone, email or regular mail regarding the nature of the complaint. If the client requests a copy of the record, the UNITY staff will follow the process in 5.2. Once the client has been contacted, validated, and the nature of the complaint understood, the UNITY Staff will investigate the complaint and provide its findings to the client who lodged the grievance. UNITY will notify the parties involved and the appropriate community planners about the alleged incident reported. If the client is not satisfied with the findings of the grievance, the client must submit a grievance request in writing to the CoC Lead Agency. All findings of the CoC Lead Agency will be final.

Policy 5.4: Other UNITY Partner Agencies have a right to file a grievance with the UNITY staff about any UNITY Partner Agency related to violations of access in UNITY, violations of UNITY policies and procedures, or violations of any law.

Procedure: UNITY staff will review any UNITY Partner Agency grievance against any other UNITY Partner Agency. In cases where a client leaves one UNITY Partner Agency to receive services from another UNITY Partner Agency and the client reports a suspected violation, the new UNITY Partner Agency may file a grievance on behalf of the client, with the client's permission. UNITY staff will follow grievance procedure as detailed in Policy 5.3.

Client Records Requests

Policy 5.5: Clients have a right to request a copy of their information in the system and be provided that information in a timely manner.

Procedure: All UNITY Partner Agencies are required to provide a copy of their client record from UNITY upon written request by the client. No UNITY Partner Agency should refuse the request. The client should be able to see any and all information entered into the system about them, even case notes. The information should be provided to

the client in a timely manner from the date of the request. Partner Agency shall fulfill the client's request within 7 to 10 business days.

Revoking Authorization for UNITY Data Collection

Policy 5.6: All clients who initially agree to participate in UNITY have the right to rescind their permission for data sharing in UNITY with the exception of those who have been entered into a financial assistance program, or a program prohibiting this because of funding sources.

Procedure: Clients who choose and are permitted to revoke their information sharing authorization must submit a signed and dated request to any UNITY Partner Agency. The Partner Agency will submit the request to HMIS Lead Agency. The UNITY staff will be responsible for closing the client record from view. Once "closed", the UNITY Partner Agency will no longer be sharing the currently collected set of client data being entered into UNITY with other Partner Agency providers. The previously viewable data will still be seen and shared with other Partner Agency providers. The new revocation request should be kept on file by the Partner Agency. In the case that a client is accepted into a UNITY-participating financial assistance program, the client must sign a UNITY Release of Information form and UNITY staff must be notified to re-open the client record for sharing.

Case Notes & Data Discrepancies

Policy 5.7: A Partner Agency must make corrections to any data in the system requested by a client if the client requests and can provide verifiable data.

Procedure: A client can request changes to their data record in the system at any time. The UNITY Partner Agency who provided the service to the client at the time of the discrepancy is the one responsible for correcting the issue.
If the discrepancy is of a universal data nature, the client must provide verification of the change they are requesting. For example, if the social security number is wrong, they should present a social security card.

If the discrepancy is about a case note, the UNITY Partner Agency should never edit, amend or delete a case note. The client can request a case note be added noting the correction of a previous case note.

The HMIS Lead Agency will not correct any issues about data discrepancies unless the data entered in question is by a Partner Agency who is no longer using UNITY.

Section 6: Privacy, Safety & Security

National Privacy Requirements

Policy 6.1: The UNITY Information Network complies with all federal, state, local laws, standards, and regulations.

Procedure: It is imperative that partner agencies have policies and procedures in place that ensure compliance with applicable laws and regulations that govern their programs.

HIPAA Covered Entities. Any Agency that is considered a "covered entity" under the Health Insurance Portability and Accountability act of 1996, 45 C.F.R., Parts 160 & 164, and corresponding regulations established by the U.S. Department of Health and Human services is required to operate in accordance with HIPAA regulations. More information about 45 C.F.R. may be found at: http://www.hhs.gov/ocr/privacy/

42 CFR Part 2 Entities. Any Agency that is considered a "covered entity" under 42 C.F.R. Part 2, and corresponding regulations established by the U.S. Department of Health and Human Services is required to operate in accordance with the corresponding regulations. More information about 42 C.F.R. may be found at: https://www.integration.samhsa.gov/operations-administration/the_confidentiality_of_alcohol_and_drug_abuse.pdf

Domestic Violence (DV) Shelters. Any agency that is a victim service provider is barred from disclosing identifying information to HMIS as of 2007. More information about DV Shelters and HMIS may be found at: http://epic.org/privacy/dv/hmis.html

Other Entities. Any Agency that is NOT considered a "covered entity" under any of the above mentioned programs is required to operate in accordance with HMIS/UNITY privacy and security rules, as well as any applicable federal, state, local laws and regulations. More information about HMIS Privacy and Security Rules may be found at: https://www.hudexchange.info/programs/hmis/hmis-data-and-technical-standards/.

Privacy Notice

Policy 6.2: UNITY Partner Agency providers must post a UNITY Privacy Notice prominently in areas of plain view of the public such as waiting rooms, intake areas, lobbies, or screening or assessment areas. UNITY Partner Agency providers are required to provide a copy of the UNITY Privacy Notice to all clients upon request by the client.

Procedure: UNITY Partner Agency providers are required to post a Privacy Notice that discloses collection and use of Client Information. UNITY has developed the document for posting by providers. **The UNITY Privacy Notice document may be**

found at http://thhi.org/unity/unity-documents/.

System Security and Privacy Statement

Policy 6.3: The UNITY Information Network has implemented extensive technical and procedural measures to protect the confidentiality of personal information. This allows for reasonable, responsible, and limited uses and disclosures of data as recommended in the HMIS Data and Technical Standards.

Procedure: The security and confidentiality of homeless and at-risk client information within HMIS/UNITY is a major issue. For certain providers and sub-populations, such as Domestic Violence Shelters, Substance Abuse Facilities and HIPAA Covered Entities, security and confidentiality of client information becomes even a much larger concern for all involved. The HUD HMIS Data and Technical Standards, published June 30, 2004 and updated through March, 2010 by the U.S. Department of Housing and Urban Development (HUD), include extensive HMIS Privacy and Security Standards to be followed by Continuums of Services, Homeless Assistance Providers, and HMIS Software companies. These standards were developed after careful review of the Health Insurance Portability and Accountability Act (HIPAA) standards for securing and protecting patient information. The UNITY Information Network has and will continue to be in compliance with these Privacy and Security Standards even while not being considered a HIPAA covered entity as an HMIS Lead Agency.

Policy 6.4: UNITY secures the location of the server in a HIPAA controlled hosting environment providing security from data loss and theft.

Procedure: UNITY Information Network contracts with a HUD-approved software vendor to provide HMIS to the Continuum of Care. As a web based HMIS solution, the HMIS software and data-bases are hosted on secure servers in a highly secure computer room accessible only by very few employees who are responsible for maintaining and supporting the system. The servers are also protected by firewalls to prevent unauthorized external access.

Policy 6.5: UNITY ensures that only appropriate staff and volunteers at UNITY Partner Agency providers gain and retain system access through a user authentication process.

Procedure: As a cloud or internet based software system, each UNITY user will access the system via their internet web browser. To access UNITY, each user must know the web address (URL) for UNITY. Once on the website, each user must use a valid user sign on and dynamic password. All user names and initial temporary passwords are issued by UNITY staff only. Passwords are considered expired every 45 days and users are prompted for new dynamic passwords. Additionally, after three failed login attempts, user ID's and passwords automatically become inactive and users must contact an Agency Administrator or UNITY staff for re-activation. Passwords are always encrypted and can never be seen in clear text.

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Policy 6.6: The UNITY Information Network secures data as it is traveling over the internet and is stored on the centralized server by providing encryption for all data.

Procedure: As a cloud or web-based software system, it is imperative that all data travel through the internet encrypted or unreadable to an outside user. All UNITY transactions are fully encrypted using Secure Socket Layer (SSL) with 128-bit encryption. This is the highest commercially available encryption level and is the same as used by financial institutions. Users can be assured that the data they are interacting with is secure by noticing the URL, or Web Address while using UNITY begins with the letters HTTPS.

Policy 6.7: UNITY staff, in conjunction with the UNITY Partner Agency Administrator, ensures that all End Users have access to the components of the system appropriate for their level of data usage.

Procedure: The UNITY software has a built-in security system that ensures each user only has the minimum access needed to perform their normal duties. Each UNITY End User is assigned a security level in their user profile that grants them access to only the areas they need to accurately do their work. A change to the level of system security for an end user may only be requested by an Agency Administrator or Executive Director for which the end user works.

Policy 6.8: UNITY staff uses system auditing tools to ensure system oversight, investigate privacy or security breaches, or filed client grievances.

Procedure: UNITY software has built-in audit trail applications that allow administrators to audit use and access of data. Audit reporting is an integral part of maintaining system security protocols and is performed on a scheduled basis by UNITY staff.

Policy 6.9: UNITY is a shared information system with its default visibility and security exceptions preset by UNITY staff based on the workflow of the Partner Agency.

Procedure: UNITY is an open or shared HMIS system. The default visibility settings for clients will be set to OPEN for all UNITY clients that are not registered or receiving services from any 42 or 45 CFR facility or program. If a client is enrolled in a 42 or 45 CFR covered entity program, program visibility settings will be set accordingly.

The UNITY system utilizes a set of Visibility Settings that allow sharing of only agreed upon data elements among the participating Continuum of Care UNITY partners. These visibility settings allow for the sharing of the most useful data while denying sharing of protected data.

The UNITY system utilizes a set of Security Exceptions that disallow sharing of certain information by provider programs based upon federal, state, or local laws and guidelines, and by agreement with each UNITY Partner Agency provider.

System Visibility settings may only be changed by the UNITY staff and requests to change visibility settings must be made via written request to UNITY staff. The UNITY System is constructed to offer a dynamic range of levels of security based on the needs of the agency and End User. As a default, End Users will only have enough security access to perform their normal job duties. Requests to change a user status must come from an UNITY Partner Agency Administrator or Executive Director.

Section 7: User Training

UNITY Training Descriptions

UNITY offers the following training opportunities for its end users:

- UNITY Agency Administrator Training

- UNITY Basic User Training

- UNITY Advanced User Training

- UNITY Reporting Training

- UNITY Refresher Training

UNITY Agency Administrator Training

Prerequisite: User must have successfully completed UNITY Basic User Training. A completed UNITY Partner Agency Agreement Addendum A form signed by the Executive Director/Chief Executive Officer must be on file with UNITY identifying the correct Agency Administrator in training.

Every Agency Administrator must attend Agency Administrator Training. This training is specially designed to teach the Agency Administrator about how to communicate with the UNITY staff and manage and monitor their UNITY data. Additionally, the class outlines the expectations required of Agency Administrators and how to request technical assist from the UNITY staff.

UNITY Basic User Training

Prerequisite: Proof of basic computer competency or proof of completion in a basic computing course.

All End Users must attend Basic User Training. All End Users must be registered for all trainings at least 4 business days in advance of attending. All users must arrive at training no later than 15 minutes past the start of the training or they will be required to re-register for another date.

This class will focus client rights, data security, and basic data entry requirements. Training includes a discussion on the current UNITY forms (the UNITY End User Agreement, UNITY Release of Information, UNITY Notice of Uses and Disclosures, and UNITY Privacy Notice). Users who successfully complete training will receive their User License and login credentials to access the UNITY Live Site within 3 business days. All users will continue to have access to the training site, where users are encouraged to practice the skills and knowledge they learned in training.

UNITY Advanced User Training

Prerequisite: Completed Basic User Training and were granted a license to the UNITY live site.

Users will register at least 4 business days in advance of attending. All users must arrive at training no later than 15 minutes past the start of the training or they will be required to re-register for another date.

Advanced Training is a continuation of Level 1 training for users who will be doing more advanced data entry and managing client case files in UNITY. This class will discuss usage of the case management tools, completing self-sufficiency outcomes matrix, logging service outcomes, and tracking referrals. When appropriate, Advanced training will include instruction for advanced modules in UNITY, including SkanPoint, SkanPoint Auxiliary, ShelterPoint Auxiliary, and ActivityPoint. Users will have had access in the UNITY live site, and post-training the features will be immediately available.

If your agency is interested in learning more about the advanced modules and tools available in UNITY, please submit a request through Zendesk by emailing support@unityofhc.zendesk.com.

Level 2 is not required for all users.

UNITY Reporting Training

Prerequisite: Completed UNITY Basic User Training and were granted a license to the UNITY live site.

Users will register at least 4 business days in advance of attending and must get approval from the Agency Administrator. All users must arrive at training no later than 15 minutes past the start of the training or they will be required to re-register for another date.

The Reporting training is an overview of the reporting tab in the system and how to read data quality reports. This class will focus on increasing knowledge of data quality basics and using the canned reports available in UNITY. Reports overview may include a combination of the following, as appropriate for trainees: HUD CoC APR, ESG CAPER, Client Served Report, Daily Unit Report, Exit/Entry Report, Outstanding Referral Report, Service Transaction Report, and the Advance Reporting Tool (ART).

Reporting Training is strongly encouraged for all users.

UNITY Training Process

Policy 7.1: All End Users are required to have a basic computer competency prior to attending any UNITY training.

Procedure: End Users should be able to turn on/off a computer, use a mouse and keyboard, launch a browser, enter a URL, and navigate the World Wide Web. End Users who cannot complete these tasks should be sent to a basic computer competency class prior to being scheduled for UNITY training. UNITY staff will verify the competency of all users prior to training.

Policy 7.2: UNITY staff offer Basic User, Advanced, and Refresher trainings as group trainings with no less than 2 scheduled participants for any class.

Procedure: Classes with less than the minimum may be canceled at the discretion of the trainer. If cancelled, registered participants will be moved to the next available training class.

Policy 7.3: UNITY staff offer the UNITY Agency Administrator training and Reporting training as an individual or group training based on the needs of the user or UNITY Member Agency.

Procedure: For UNITY Agency Administrator training and Reporting training, both initial training and follow-up can be scheduled as a one-on-one in order to answer specific questions or issues that have arisen about the data in the system. Both one-on-one and group training sessions for these courses will be offered to all UNITY partner agency providers.

Policy 7.4: All UNITY End Users must successfully complete Basic User training in order to obtain a license and gain access to the UNITY system.

Procedure: UNITY Basic User training is mandatory for every UNITY End User. Ensuring that everyone attends Basic User training allows the UNITY Information to ensure the integrity of data entry as well as compliance with client confidentiality and privacy policies. UNITY Staff may require additional training prior to providing a license as needed, at the discretion of the trainer. Additional training may include basic computer competency training, attending an additional Basic User training, or one-on-one training.

Section 8: UNITY Technical Support

Policy 8.1: The UNITY staff will provide a technical support help desk to capture End Users' technical assistance inquiries and requests.

Procedure: All requests for technical assistance must be submitted to the UNITY help desk. An end user may submit a ticket to the UNITY help desk by sending an email to support@unityofhc.zendesk.com.

Responses will be answered according to their level of priority. All inquiries will be answered during normal UNITY business hours, Monday through Friday, 8:30am to 5:00pm.

Policy 8.2: The UNITY staff will respond to all inquiries from Partner Agencies and clients in a timely manner.

Procedure: Inquiries consist of; client data and reporting related issues, data quality inquiries, and/or case or client inquiries. Response times for technical assistance vary based on the item that is submitted and the associated priority. UNITY Staff have the right to adjust priority levels based on the type of request.

Normal Business Hours. Requests for routine system technical support will be honored on a first come-first served basis categorized in the following manor:

Issue Type	Type Definition	Tool to Report	UNITY Staff Response Time
Urgent Priority Response	Users are unable to use system. For example: the system is down or the site is unreachable.	Submit a ticket using UNITY Zendesk and call 813.223.6115	Immediate. Less than 12 hours.
High Priority Response	Users can use the system, but one or more functions important to day-to-day operational use is severely affected. For example: password issues, permission issues, security issues, not accepting data, or screens have changed.	Submit a ticket using UNITY Zendesk	Less than 24 hours.
Normal Priority Response	A problem is noted, but users are able to use all functions in the systems without major difficulty. For example: reporting issues, general questions, workflow issues, data entry problems, change to a report, or change to	Submit a ticket using UNITY Zendesk	Less than 48 hours.

	screens.		
Low Priority Response	Questions not related to data entry, quality or reporting issues. For example, new membership requests, license requests, training requests, documentation requests, etc.	Submit a ticket using UNITY Zendesk	Less than 72 hours.
Feature Enhancement	Users are able to use all functions in the system as normal but are requesting an enhancement to the system that is currently not available.	Submit a ticket using UNITY Zendesk	Less than 72 hours.

After Hours. After hours and weekend requests will be treated as if the request was received at opening of the next business day. UNITY staff normal working hours for Technical Assistance are Monday through Friday, 8:30 am. through 5:00 pm. For after-hour requests, please contact your Agency Administrator.

Policy 8.3: The UNITY staff will submit to the vendor all feature enhancement requests submitted through the proper channels from Agency Administrator(s) or End Users.

Procedure: It is a stated goal of UNITY to be as efficient and user-friendly as possible within the technical restraints of the system. Feature enhancement requests are welcomed and encouraged. Please submit all possible feature enhancements in the following manner:

- Begin by submitting an email to UNITY Help Desk.
- Type feature enhancement in the subject line.
- Be as specific as possible in the request.
- If appropriate, describe the current workflow first and the suggested feature enhancement right after.
- If enhancement is for new system functionality, please describe a workflow and diagram as much as possible.
- If appropriate, please denote how much time savings would be achieved if the feature enhancement were to be enacted.
- If appropriate, please denote all of the possible benefits for your agency or End Users and other Member Agency providers if feature enhancement were to be enacted.

Policy 8.4: The UNITY Information Network staff will hold in-person meetings or conference calls for Agency Administrators and other end users to discuss system changes and provide technical support.

Procedure: Meetings and conference calls will be scheduled as needed. Agendas will be driven by HMIS changes/updates, HMIS system reporting needs, and requests submitted by partner agencies for discussion. All information, including agenda and instructions, will be sent to agency administrators via e-mail 48 hours before the meeting. All attendance records are open to review by local government entities and other community planners.

Section 9: Data Collection Process

Clients Served vs. Clients Benefiting from Service

Policy 9.1: All client data entered into UNITY by the Partner Agency should be that of a client receiving services and/or its family in attendance.

Procedure: Adult clients entered into UNITY should consist of the adult clients in attendance at the day of enrollment into the program or services. UNITY is not meant for individuals who are not in attendance or may benefit from services at a later date. UNITY Partner Agency providers should refrain from entering clients into UNITY that are not physically seen to be enrolled in the program or provided the service. For example, if a person has a household of 8 people, but the UNITY Partner Agency is only serving 1 person in the family, then that 1 person only should be entered into UNITY until the other family members come in for services. For those providing financial assistance services per address, it is expected each member of the household receiving the service by the same address must provide consent and be entered as a household unit in UNITY and linked together using a service transaction, otherwise there is a risk of duplication of services. Data on all members of the family should be entered individually, but tied together as a household. Parent or guardian can give consent for all minor children (under 18 years of age) in a family but cannot give consent for any adult members (over the age of 18). All adults must give their consent individually. Minors under the age of 18 should not be entered into the system without consent from a legal guardian. Minors under 18 may be entered only if the child is an emancipated minor.

Notice of Uses and Disclosures and Release of Information (ROI)
Refer to Section 5: Client Rights for details.

Data Entry Requirements

Policy 9.2: The UNITY Information Network requires each UNITY Partner Agency to enter client level data based on the most recent approved Data Quality Plan.

Procedure: The UNITY Data Quality Plan is based on the most current revision of the HUD Homeless Management Information System (HMIS) Data Standards. Every program entering into UNITY must adhere to the requirements set by HUD and the Tampa/Hillsborough County Continuum of Care.

Managing Bed Inventory *(Housing/Shelter Providers Only)*

Policy 9.3: All Housing Providers are required to maintain the most current bed inventory in UNITY. UNITY must be notified at least 5 days in advance of a change to any beds at the facility and client inventory in UNITY in real-time must reflect the most current program utilization.

Procedure: All Housing Providers must work with UNITY Staff to build accurate bed lists in UNITY. Each UNITY bed list should be assigned to the appropriate program (Emergency, Transitional, Permanent Supportive, etc.). If there are any changes to the bed lists, the Agency Administrator is required to notify the UNITY System Administrator at least 5 business days prior to the beds becoming available. Clients being assigned to beds or exited from beds in the system should be done in real time as the client is entering and exiting the program. In cases where clients are unable to be entered or exited in real time due to technical difficulties, all data must be current within 24 hours. Clients entering as families must be built as families in UNITY prior to bed entry and must be assigned together as part of the ShelterPoint module.

Social Security number collection, viewing and changing

Policy 9.5: Client social security numbers will be collected to uniquely identify clients in the system.

Procedure: UNITY Partner Agencies are encouraged to secure any social security numbers that exist on paper from the time it is collected up to and including digital and non-digital storage. Furthermore, UNITY Partner Agencies are strongly encouraged to review their intake area for privacy and security to ensure client social security numbers are not overheard during the intake interview or collection process by other clients or staff.

> **Policy 9.5.1:** Client social security numbers should be collected in full upon creation of a new client record.
>
> **Procedure:** For each client in the system entered for the first time, it is a requirement to get a full or partial social security number upon creation of the client record in the system. This full or partial social security number is used to create a unique client record in the system to help obtain unduplicated counts of clients served.
>
> UNITY encourages the collection of at least the last 6 numbers. If a client does not know, please enter 999-99-9999.
>
> For those clients applying for a Social Security Number, such as newborns

and/or refugees the number will be entered in to the client record upon receipt of the Social Security Card.

Policy 9.5.2: Client social security numbers that need to be edited must have back-up documentation verifying the change is accurate.

Procedure: If a case manager, intake worker, volunteer or other data entry person would like to make a change to the social security number already in the system, they will verify backup documentation supporting the change. Backup documentation would include a letter from the client or copy of the consent to release of information AND a copy of the social security card showing the correct number to be changed.

Case Management Tools

Policy 9.6: UNITY Partner Agency providers are encouraged to use the case management tools to track a clients' progress towards behavioral change and self-sufficiency.
Procedure: UNITY has several case management tools that will assist Partner Agency providers in helping clients reach self-sufficiency. These tools include case notes, goals, action steps, tracking referral progress and the self-sufficiency outcomes matrix. Training for these tools are covered in UNITY Advanced training on case management.

Policy 9.6.1: Partner Agency providers are encouraged to use the UNITY Client Self-Sufficiency Outcomes Matrix as an assessment tool for all clients that are entering and exiting in a program.

Procedure: The Client Self-Sufficiency Outcomes Matrix is an optional assessment tool for each client in the UNITY system. The matrix is built with a series of assessment domains that a case manager may use to evaluate the strengths and weaknesses of a client as they begin and continue their case plans and assistance strategies. The domains are as follows: Income, Employment, Shelter, Food, Childcare, Children's Education, Adult Education, Legal, Health Care, Life Skills, Mental Health, Substance Abuse, Family Relations, Mobility, Community Involvement, Safety, and Parenting Skills. Case Managers utilizing this tool usually pick a series to focus on and then complete at entry, at several points during, e.g.(interim), and finally at exit. Client Self-Sufficiency Outcomes Matrix training is part of Advanced training.

UNITY ScanCard Program

The UNITY Information Network and the UNITY Advisory Committee has made the UNITY ScanCard Program available to the UNITY Partner Agencies of the Tampa/Hillsborough Continuum of Care . The UNITY ScanCard Program provides

homeless individuals served with the ability to obtain an UNITY ID card that may assist in quicker access to services at UNITY Partner Agencies and serve as proof of residency for accessing certain services. The UNITY Staff and UNITY Advisory Committee will continue to explore potential uses of the UNITY ID card.

The UNITY ScanCard Program provides high volume homeless service projects with with the ability to generate individual ID cards for homeless persons served and to use those ScanCards to quickly log service transactions in UNITY. ScanCard equipment, training, and limited hardware support will be provided, as needed, by UNITY Information Network.

Service providers must maintain compliance with data quality standards to participate in the ScanCard Program.

Policy 9.7: Member Agency providers are encouraged to create and disseminate UNITYScanCards for all homeless clients being entered into UNITY.

Procedure: The UNITY Information Network and ServicePoint have made available the UNITYScanCard to serve as the identification for all homeless clients in the system. End users creating the UNITY ScanCards must follow the procedure set forth in the ScanCard Production Guide. Per the ScanCard Production Guide, UNITY ScanCards may or may not have the client's photo included, depending on the type of verification of identity provided by the client. UNITY Partner Agency providers are encouraged to accept the UNITY ScanCards with photos as proof of ID for all clients to whom they provider services.

Section 10: Data Quality and Performance Measurement

Data Quality

Data quality is vitally important to the success of the UNITY Information Network. Together the Tampa/Hillsborough County Continuum of Care (CoC), UNITY Partner Agency providers and UNITY staff will work diligently on adhering to data quality standards in order to ensure that reports both at the provider level and the system level are complete, consistent, accurate, and timely. Adherence to set data quality standards will help bring additional funding into our community as well as ensure that our data reflects our communities' level of service when reported at the local, state or national level.

Policy 10.1: The UNITY Partner Agency Administrator in conjunction with the UNITY staff will follow the procedures and standards set forth by the Tampa/Hillsborough County CoC Data Quality Plan.

Procedure: All client data entered into UNITY should be congruent with program type standards outlined in the Tampa/Hillsborough County CoC Data Quality Plan.

The UNITY staff will measure the performance of UNITY Partner Agency providers as it relates to the quality of the data entered into the system. Additionally, performance

on a system and project level will be measured to show the progress towards our Continuum of Care goal of ending homelessness.

Policy 10.2: The UNITY Partner Agency staff will monitor the timeliness, completeness, and accuracy of data entered by their agency to ensure the accuracy of system and project performance measurement.

Procedure: UNITY Partner Agencies must adhere to the standards detailed in the Tampa/Hillsborough County CoC Data Quality Plan for monitoring the timeliness, completeness, and accuracy of data entered by their agency.

Performance Measurement

Policy 10.3: The UNITY staff will measure the bed utilization rates of homeless shelter providers and publish it to the Internet in real-time.
Procedure: As a quality monitoring tool, the UNITY staff has published the real-time bed utilization rate for each homeless shelter provider to the Internet. Information on how to access this information can be obtained by contacting the UNITY staff.

This live real-time information is pulled from the active bed list in the system. As beds become used or available, the utilization rate shows live online for the public to see. Each bed list will be monitored for accuracy. Providers who cannot fill vacant beds because the unit is full should place the bed(s) as HELD to accurately reflect their unit availability. However, upon review of any bed list in the system regardless of designation, if it is determined that a bed is being HELD without cause, the UNITY staff will take the bed off of hold to show the true vacancy. This practice will be reported to the local contract managers and the Tampa/Hillsborough County Continuum of Care Lead Agency

Policy 10.4: The UNITY staff will measure system-level performance of the Continuum of Care and publish the measurement.

Procedure: UNITY has been requested by HUD, Other Federal Programs, Local Government Entities, and the Tampa/Hillsborough County Continuum of Care Lead Agency to measure performance of our Continuum of Care towards the established System Performance Measures. UNITY staff will work to meet the deadlines set and provide technical assistance to providers who are attempting to meet these metrics.

- Measure 1: Length of Time Persons Remain Homeless
- Measure 2a: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 6 to 12 Months
- Measure 2b: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 2 Years
- Measure 3: Number of Homeless Persons
- Measure 4: Employment and Income Growth for Homeless Persons in CoC Program funded Projects
- Measure 5: Number of Persons who Become Homeless for the First Time
- Measure 6: Homelessness Prevention and Housing Placement of Persons Defined by Category 3 of HUD's Homeless Definition in CoC Program-funded Projects

- - Measure 6a: Preventing Returns to Homelessness within 6 and 12 Months Among This Subset of Families and Youth
    - Measure 6b: Preventing Returns to Homelessness within 24 Months Among This Subset of Families and Youth
    - Measure 6c: Successful Housing Placement Among This Subset of Families and Youth
  - Measure 7a: Successful Placement from Street Outreach
  - Measure 7b: Successful Placement in or Retention of Permanent Housing

Policy 10.5: UNITY staff may assist UNITY Member Agencies in their individual performance reporting, if requested and able, but the responsibility of performance measurement, oversight, and data correction is the responsibility of the UNITY Partner Agency.

Procedure: UNITY staff is responsible for, and accountable to, the overall health of the UNITY system and CoC System Performance and accountability. While the UNITY staff strive to assist all UNITY Partner Agencies in a timely manner with all issues presenting, it is the UNITY Partner Agency's responsibility to manage, monitor, prepare and repair its' client data and reports for performance reporting to fulfill its contract requirements. Since each UNITY Partner Agency controls the data and workflow from their programs, the UNITY staff will only be able to provide limited assistance. The UNITY staff are responsible for reporting system errors, bugs, defects, and other ill working processes to the vendor for repair. The UNITY staff is at the will of the software provider to make all functionality changes to the system.

Section 11: Data Use & Research

The UNITY staff will use the data entered into the system for system-wide trend & performance reporting, community planning purposes and for use in research projects. Data within UNITY is strictly for UNITY Partner Agency use and planning on service delivery in our community. All data uses will adhere to the policies outlined below:

Policy 11.1: Data within UNITY will be used for Tampa/Hillsborough County Continuum of Care Reporting.

Procedure: Data within UNITY will be used to assist clients accessing services, provider in-depth case management to help clients reach self-sufficiency, to understand the impact of services on clients, and the impact that the UNITY Partner Agencies are making in improving our community. Additionally, the data will be used to report and evaluate providers' performance on local contract objectives and local continuum requirements set by State and Federal Agencies. All data used for these purposes should be aggregated. No client-level personal identifiable data will be used outside the constraints of the UNITY system without proper authorization from the client and the service provider. Clients provide authorization for data use by signing the UNITY

Release of Information and UNITY Notice of Uses and Disclosures forms prior to entering data into the system.

UNITY uses client-level personal identifiable data to develop aggregated reports for publication on several key reports annually, including but not limited to: System Performance Measures, Longitudinal System Analysis (LSA), Homeless Point-In-Time Count, Housing Inventory Chart, and Florida Council on Homelessness Annual Report. Additionally, aggregated client-level personal identifiable data can be distributed monthly to UNITY Partner Agency providers for data quality review and correction.

Policy 11.2: Data within UNITY will be used for UNITY Partner Agency evaluation & reporting.

Procedure: Data within UNITY will be used by Partner Agency providers to evaluate their program performance and report on their client successes. All data taken from the system to report to a third party, or to be published publicly, should only be used in aggregate; i.e. individual client data should not be submitted for such reports. Individual client data should be used solely be for the purposes of internal program and data quality review. All client-level personal identifiable data downloaded from the UNITY system either electronically or printed on paper should be properly and permanently locked away after its use or destroyed as to protect the client from harm and client data from theft and/or misuse. All non-secured client-level personal identifiable data is in violation of this UNITY Policy. Any client-level identifiable data that need to be shared electronically should be encrypted (128-bit or higher) and password protected before being sent to another party through use of security software.

Policy 11.3: Data within UNITY will be used for collaborative data & research projects with partners outside the Tampa/Hillsborough County Continuum of Care.

Procedure: Data entered into UNITY by Partner Agency providers will not be used outside the constraints mentioned in sections 12.1 or 12.2 without the authorization of any UNITY Partner Agency. Under no circumstances will any UNITY client-level personal identifiable data be shared with the Federal, State, or local Government entities for research purposes.

Any client-level personal identifiable data used and submitted to non-UNITY partners for any research purposes will require a specific agreement between the research entities and the entity that administers UNITY.

A written research agreement must:
1. outline the scope of the research project;
2. outline the data elements required for analysis;
3. outline a time line for data use;
4. identify who will have access to client-level personal identifiable data during the project;
5. require that the recipient of data formally agree to comply with all terms and

conditions of the agreement by signing a document outlining the expectations for handing the data and the consequences for violations.
6. establish rules and limitations for the processing and security of client-level personal identifiable data in the course of the research;
7. provide for the return or proper disposal of all client-level personal identifiable data at the conclusion of the research;
8. restrict additional use or disclosure of client-level personal identifiable data, except where required by law.

A written research agreement is not a substitute for approval of a research project by an Institutional Review Board (IRB), Privacy Board or other applicable human subjects protection institution.

Once a written research agreement is in place, the UNITY staff will notify all UNITY Agency Administrators regarding the research project and allow providers to opt-in or opt-out of whether their service information will be included in the research project. Since UNITY is a shared client information system, clients shared between providers cannot be opted-out of a research study.

Once provider authorization has been received, the UNITY staff may use or disclose client-level personal identifiable data for academic research conducted by an individual or institution that has a specific agreement if the research is conducted either:

By a vetted individual employed by or affiliated with the research organization contracted to perform the research project; or

By an education, research institution, or consulting firm contracted to perform the research project.

All questions about the UNITY data used for research should be submitted in writing to UNITY@THHI.org.

The only exception to this rule is in instances where a local government entity has a written contract with a UNITY Partner Agency that already includes language where their data can be used for research purposes. If this is the case, it is the responsibility of the local government entity to notify the UNITY Partner Agency about the extraction and use of their data within UNITY.

Policy 11.3.1: UNITY Partner Agency providers will not violate the terms of use of data within UNITY system.

Procedure: UNITY Partner Agency providers will not breach system confidentiality by misusing UNITY data. UNITY data is not to be used for any purpose outside the use of program evaluation, education, statistical and research purposes.

Policy 11.3.2: UNITY Partner Agency providers shall not use any data within

UNITY to solicit clients, organizations or vendors for any reason.

Procedure: At no time shall confidentiality of clients, organizations and vendors be violated by disclosing client information to non-members. Data in UNITY will not be used to solicit for donors, volunteers, sponsorship, or employees of any type. This information must not be sold, donated, given, or removed from UNITY for any purpose that would violate client, organization, or vendor confidentiality or put them at harm or risk. Those found in violation of this rule will have their access to UNITY immediately terminated and the violation disclosed to all local government and funding entities.

Policy 11.3.3: UNITY Partner Agency providers shall not sell any UNITY client, organization, or vendor data for any reason.

Procedure: At no time shall confidentiality of clients, organizations and vendors be violated by selling any information. UNITY Partner Agencies shall not profit from disclosure of client, organization or vendor information. Disclosure of any UNITY information puts every client and Partner Agency at legal risk. Violation or breaches in HIPAA and 42 CFR regulations include fines and jail time. Those found in violation of this rule will have their access to UNITY immediately terminated and the violation disclosed to all local government and funding entities.

Policy 11.4: Data within UNITY will be used to assist planners during times of death, disaster, public health emergencies or public safety where client are at risk.

Procedure: Data in UNITY can be used to help planners during times of death, disaster, public health emergencies or public safety where clients are at risk. During these instances, the UNITY staff will work closely with organizations, public officials, funders, and/or law enforcement to assist clients who are at risk. The UNITY staff will only validate information presented to the staff and provide local contact information for the most recent service provider serving the client. The UNITY staff will not print off, give an electronic copy of, or disclose any other personal information without a subpoena.

However, in cases of death, UNITY staff will disclose any next of kin information in the system in addition to provide local contact information for the most recent service provider serving the client. UNITY staff will also do the following to note the client as deceased in the system.

1. The word "Deceased" should be written in the "Alias" name field.
2. The most recent provider with an open entry or service will be notified and requested to change the exit destination and reason for leaving to "Deceased".