Kentucky Homeless and Management Information System

Statewide Policy and Procedures

Revised January 2025

Please note, violation of the Kentucky Homeless Management Information System (KYHMIS) Participation Agreement and KYHMIS User Confidentiality Agreement, including without limitation to the failure to comply with the policies and procedures related to the KYHMIS as contained in this manual, may subject the participating agency to discipline and termination of access to the KYHMIS and/or termination of other Kentucky Housing Corporation (KHC) contracts. All participating KYHMIS Projects, as well as Victim Service Providers funded by the U.S. Department of Housing and Urban Development, the U.S. Department of Veterans Affairs, the U.S. Department of Health and Human Services, and SAMSHA, are required to abide by the policies and procedures outlined in this manual.

Table of Contents

Vision Statement

The vision of Kentucky Housing Corporation (KHC) is to operate a user-friendly data collection system that produces timely, accurate, and complete information for stakeholders to use, ensuring the effective delivery of housing and services to alleviate homelessness in Kentucky.

Introduction

The Kentucky Homeless Management Information System (KYHMIS) was developed to support Kentucky's Continuum of Care (CoC) and partner agencies in their missions, by supplying them with the tools to gauge data and outcomes for their projects. The KYHMIS provides information to the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Veterans Affairs (VA), the U.S. Department of Health and Human Services (HHS), Substance Abuse and Mental Health Administration (SAMHSA), local nonprofit boards, state-level policy makers, and other advocates in their missions.

The KYHMIS is a client information database that provides a standardized assessment of client needs, creates individualized service plans, and records the use of housing and services. The fundamental goal of the KYHMIS is to use the data to determine the utilization of services of participating agencies, identify gaps in the local service continuum, and develop outcome measurements. The KYHMIS can identify patterns in the utilization of assistance, as well as document the effectiveness of services for clients.

All this will be accomplished through data analysis of the actual experiences of persons, as well as the service providers who assist them in shelters and assistance projects throughout the state. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, service providers, advocates, and consumer representatives. Statewide reporting is based on aggregate, non-identifying data; therefore, such data may be shared with the public.

The KYHMIS uses a Web-based software product from WellSky called Community Services, which resides on a central server, to facilitate data collection by service organizations across the state. Access to the KYHMIS is limited to agencies and authorized staff members who have met the necessary training requirements and have signed the necessary privacy, data sharing, security, and licensing documentation, as listed in this manual. As the guardians entrusted with personal data, agencies have both a moral and a legal obligation to ensure that data is being collected, accessed, and used

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

Every project that receives federal homeless assistance funds (or if required by your grant agreement) is required to enter data on persons served with those funds into the KYHMIS. In addition, some projects funded through the VA, SAMHSA, and HHS are required to enter data into the KYHMIS. Each agency will need to reference their specific CoC grant agreement or their specific grant management requirements.

Victim Service Providers (VSP)

Those organizations that are designated as Victim Service Providers (VSPs) that are funded under HUD's Section 8 Moderate Rehabilitation SRO Program, Emergency Solutions Grant Program, and Continuum of Care Program are prohibited from disclosing any personally identifying information in an HMIS, per the requirements of federal laws.

However, VSPs are required to collect data in a comparable database with the same current HUD Data Standards and provide aggregate data to be combined with KYHMIS data for full reporting to federal agencies and Congress.

Suppression of Potentially Identifying Data in Annual Performance Report (APR)

VSPs may suppress aggregate data on specific client characteristics in the APR when the following two conditions are met:

1. The aggregate number of persons reported for a particular reporting field is less than either 1 percent of the total number of clients or five persons, whichever is greater; **and**
2. Provider staff reasonably believe that the inclusion of such information may constitute a threat to a client by allowing a victim's stalker or abuser to identify the location of a client with an uncommon demographic profile.

For example, a VSP that serves only one Asian client in a jurisdiction with a small Asian subpopulation may report that client as having an unknown or unreported race.

Minimal Standards for a "Comparable Database"

VSPs that receive funding must submit unduplicated aggregate reports about the individuals and families served with HUD funds to CoC HMIS staff. Funded providers must also have a mechanism to track the length of assistance provided to project beneficiaries. Therefore, a VSP's comparable database must collect client-level data

over time and generate unduplicated aggregate reports based on that data. It cannot be a database that only records aggregate information.

> The comparable database must comply with all current HUD Data and Technical standards, which can be found at https://www.hudexchange.info/hmis/guides/.

The data standards also require organizations to comply with any federal, state, and local laws that require additional confidentiality protections, including but not limited to:

- The Health Insurance Portability and Accountability Act of 1996 (45 CFR Parts 160 and 164).
- The Confidentiality of Alcohol and Drug Abuse Patient Records Rule (42 C.F.R. Part 2).
- The Violence Against Women Act (VAWA).

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

Minimum Data Collection Requirements for Victim Service Providers (VSP)

VSPs are required to collect and record all data elements that are required for HUD-funded providers on all clients served with HUD funds in a comparable database. The client-level data collection requirements for HUD projects are specified in the HUD Data Standards Notice.

Each CoC HMIS Lead Agency is responsible for determining if the database used by VSPs is comparable with HMIS standards and if aggregate data can be reported to the CoC from the comparable data base.

Kentucky Homeless Management Information System (KYHMIS)

KHC is the lead entity for the statewide KYHMIS implementation in Kentucky. KHC administers the Community Services software product for all three Continuums of Care (CoC) in Kentucky: Kentucky Balance of State (BoS) CoC, Louisville CoC, and Lexington CoC. KHC is the HMIS Lead Agency for the BoS KYHMIS. The City of Lexington, Office of Homeless Prevention, and Intervention (OHPI) is the HMIS Lead Agency for the Lexington CoC, and the Coalition for the Homeless is the HMIS Lead

Agency for the Louisville CoC. All three CoCs work together in support of an effective, coordinated system.

Continuums of Care:

- BoS (118 counties) – KY-500.
- Louisville/Jefferson County – KY-501.
- Lexington/Fayette County – KY-502.

Kentucky Interagency Council on Homelessness (KICH) and Kentucky Homeless Management Information System (KYHMIS)

The Kentucky Interagency Council on Homelessness (KICH) was established by executive order to bring together state policy makers, service providers, and advocates under the mission of coordinating and guiding policy across Kentucky to alleviate homelessness. Efforts in this mission rely on data for many different purposes. KICH has established the Data Subcommittee to help monitor the occurrence of homelessness and track trends, evaluate the effectiveness of projects and policies, and provide information for planning and decision making. While KYHMIS is not the sole source of data, it is a vital component.

KHC's KYHMIS staff will collaborate with the HMIS Lead Agencies for the Lexington CoC and the Louisville CoC to provide the KICH Data Subcommittee data reports.

Terminology

Business Objects (SAP): WellSky provides Business Objects (SAP) to give users access to a wide variety of reports. The SAP is used commonly for federal reporting and project customization of reports. WellSky updated the Report Writing tool from ART to Business Objects (SAP) in May 2022; however, the branding and labels still reflect "ART Reporting" at this time.

Agency Administrator: An agency's lead KYHMIS contact responsible for system administration at the agency level.

Annual Performance Report (APR): A reporting tool used to track progress, accuracy and completeness of data and accomplishments of projects.

WellSky: The company/vendor who created and maintains the KYHMIS system (Community Services) and reporting tools.

Client: An individual from whom a participating KYHMIS project collects or maintains personal identifiable information.

Continuum of Care (CoC) Project: Project identified in KYHMIS as receiving funding from HUD through the competitive CoC application process.

Executive Director: A person who serves as the top executive official of a participating agency.

Housing Inventory Count (HIC): An inventory of beds for homeless persons, including seasonal and overflow beds.

Kentucky Housing Corporation (KHC): The lead entity for the statewide KYHMIS implementation in Kentucky.

Participating Agency: Any agency/project that enters client information into KYHMIS.

Protected Personal Information (PPI): Information about a project participant that can be used to distinguish or trace the participant's identity, whether alone or when combined with other personal identifying information.

Release of Information (ROI): A document signed by the client or verbal approval by the client authorizing or denying sharing of their PPI, service information, or other pertinent client data in KYHMIS.

Community Services: A software system created by WellSky, which tracks data about people in crisis to determine individual needs, provide a referral system, and create aggregate data for reporting and planning. Community Services is Web-based and uses a standard graphical user interface similar to Microsoft Windows. WellSky updated the name of ServicePoint to Community Services.

User: An individual who has been granted access to and/or uses KYHMIS.

User License: An agreement between the individual and the CoC HMIS Agency that allows access to the KYHMIS.

Roles and Responsibilities

Kentucky Housing Corporation (KHC)
KHC is the lead agency for the implementation and maintenance of the statewide KYHMIS.

KYHMIS Management

Policy:

KHC is responsible for the organization and management of the KYHMIS. KHC KYHMIS staff is responsible for the all system-wide policies, procedures, communication, and coordination for KYHMIS.

KYHMIS staff will follow protocols established by WellSky.

KHC KYHMIS staff will notify WellSky of any software issues within 12 hours of being made aware of the issue and after an investigation at the state level has taken place.

All information received from WellSky pertaining to use, access, reporting, or live site system will be disseminated through each CoC's HMIS Lead Agency staff and then to each Agency Administrator within three business days of receipt.

KYHMIS Documentation

To ensure the integrity and security of sensitive client confidential information and other data maintained in the database, KHC requires all participating agencies and users to sign the KYHMIS Acknowledgement of Receipt of the [KYHMIS Policies and Procedures Manual](#), [KYHMIS User Agreement](#), [KYHMIS Agency Agreement](#) and [Security Monitoring Form](#) prior to being given access to the KYHMIS. Such documents may be modified as needed to ensure smooth and efficient operation of KYHMIS and will be posted to the [KHC Housing Contract Administration Partner Agency Portal](#).

Policy:

CoC HMIS Lead Agency staff will provide the necessary manuals and forms for all users within their CoC. These documents will be kept up-to-date and in compliance with HUD and all other funders' policies and requirements.

In the event a funder issues changes to the requirements, all related documentation will be reviewed and updated collaboratively by KHC and CoC HMIS Lead Agency staff.

If a funder's requirements necessitate immediate implementation of changes, such changes will be communicated to all three CoC HMIS Lead Agencies. All changes will be communicated to participating agencies and HUD-funded VSPs through the KHC eGram system and System News on KYHMIS.

Security Management

Policy:

KHC is ultimately responsible for the continuous monitoring of the security of data for the BoS as well as monitoring security of data for all other CoC KYHMIS Lead Agencies. Due to the nature of technology, unforeseen service outages may occur. To assure service reliability, WellSky provides a comprehensive [disruption recovery plan](disaster recovery plan).

All major outages are immediately brought to the attention of KHC leadership staff. WellSky support staff helps manage communication or messaging to the KYHMIS staff as progress is made to address the service outage. KHC KYHMIS staff, in turn, will communicate status updates to the KHC leadership staff and CoC HMIS Lead Agencies.

Training

Policy:

The CoC's HMIS Lead Agencies will provide timely training for all new users, in the most efficient and effective way possible. Users must participate in and satisfactorily complete "KYHMIS New User Training" prior to approval for access to KYHMIS. Users must participate in at least one KYHMIS Refresher Training course every year to have the continuing skill set for data collection and reporting.

Ultimately it is the responsibility of the participating agency's Executive Director to identify staff that will become KYHMIS Users and KYHMIS Agency Administrators. Executive Directors are responsible to choose users that have basic computer skills, including knowledge of how to navigate the Internet, email, and basic knowledge of data entry into an online software system prior to the users participating in the initial KYHMIS training. In addition, Agency Administrators need to have skills beyond that of a basic user.

CoC KYHMIS Lead Agencies may withhold user licenses from a participating agency if users are not able to demonstrate the skills needed to access the KYHMIS.

CoC KYHMIS Lead Agencies will ensure the following minimum standards are met for training:

- User
  - Security and Confidentiality Training (annually).
  - New User Training.
  - Refresher Training (annually).

CoC KYHMIS Lead Agencies may suspend user credentials for any user who is out of compliance with the required annual training until all training requirements have been fulfilled.

Agency Management

Policy:

Participating agencies will notify the CoC Lead Agency of any changes with projects including additions and discontinuations of projects and users via the HCA Partner Agency Portal at http://kyhmis.zendesk.com. CoC HMIS Lead Agencies will set-up and de-activate agencies, projects, and users, as needed.

User Management

Policy:

CoC's KYHMIS Lead Agency staff will give appropriate levels of access to the system based on user's position in the participating agency, configuration of projects, and designation by the Executive Director. To protect client security, users will always be assigned the most restrictive access possible that will still allow efficient job performance.

System Availability

WellSky provides highly available HMIS software and informs the KYHMIS statewide implementation through the WellSky Communications of any planned interruption in service. CoC HMIS Lead Agencies will inform the participating agencies pursuant to the following policy.

Policy:

Scheduled upgrades and maintenance will occur as arranged. CoC KYHMIS Lead Agencies will inform users of the exact date and time prior to scheduled upgrade via:

- Community Services News.
- KHC eGram notification.
- E-mail notification.

In the event of an unscheduled unavailability for an extended period, all participating agencies will be contacted by email and informed of the cause and the anticipated duration of the interruption of service.

Participating Agency

Security Management

Policy:

Participating agencies are responsible for ensuring all hardware and software used to access and/or store KYHMIS client-level data is in a secure location where access is available to authorized staff only. Security software will be monitored at least annually by CoC KYHMIS Lead Agencies.

Monitoring may consist of a desk monitoring or an on-site monitoring. Failure to complete any corrective actions resulting from monitoring in the given time may result in deactivation of all participating agency user accounts and the participating agency may be non-compliant with HUD and/or other funding regulations.

CoC KYHMIS Lead Agencies will ensure the participating agency meets the minimum requirements listed:

Participating agencies **must** have:

- A secure broadband Internet connection; or
- Wi-Fi with a connection protected by a network security code.

All workstations at the participating agency that access KYHMIS **must** have:

- Memory:
    - If Win7 – 2 GB minimum.
    - If Vista – 2 GB minimum.
    - If XP – 1 GB minimum.
- Monitor:
    - Screen Display – 1024 by 768 (XGA) or higher (1280 by 768 strongly advised)
- Processor:
    - A Dual-Core processor.
- Browser:
    - Firefox.
    - Google Chrome.
    - Safari.
    - Microsoft Edge.
- Password Protected Workstation:
    - All workstations **must** be locked if a licensed user leaves a workstation when Community Services is active.
- Current and Active Security:
    - Real-time antivirus scanning.
    - Manual virus scanning.
    - Automatic virus removal.

- o USB virus scanning.
- o Anti-spyware.
- o A firewall.
- o Anti-phishing.
- o Anti-spam.

Records Management

Policy:

Participating agencies must maintain appropriate documentation of any Client Acknowledgement and Release of Information records obtained in a secure location for a period of seven years after the last date of client service and assure their subsequent destruction by shredding or burning. Records must be made available to the client, upon written request, within five business days.

Compliance monitoring is completed by CoC HMIS Lead Agencies, as requested by funders, or required by regulation. CoC HMIS Lead Agencies will require participating agencies to show proof of compliance at time of monitoring. Failure to comply may result in deactivation of all participating agency user accounts, and the participating agency may be non-compliant with HUD and/or other funding regulations.

Privacy Management

Policy:

Participating agencies will be solely responsible for posting the most current "Privacy Notice" in a location for all clients to easily find and read and also have a copy of the current "Privacy Policy" on hand.

The current "Privacy Notice" and "Privacy Policy" can be found at https://kyhmis.zendesk.com. All correspondence regarding updates to "Privacy Notice" and "Privacy Policy" will be sent to agencies in the form of an eGram and posted on Community Services News.

Compliance monitoring is completed by CoC HMIS Lead staff, as requested by funders, or required by regulation. CoC HMIS Lead Agencies will require agencies to show proof of compliance at time of monitoring. Failure to comply will result in deactivation of all participating agency user accounts and the participating agency may be non-compliant with HUD and/or other funding regulations.

Data Sharing

Policy:

Data sharing among KYHMIS participating agencies will be supported automatically for all participating KYHMIS agencies. All PATH, RHY, HOPWA, and Recovery Kentucky projects are exempt from participation in data sharing under federal statute.

All projects, with exception of PATH, RHY, HOPWA, and Recovery Kentucky programs, will have data sharing privileges set by CoC HMIS Lead Agencies for client-level data. The standard level of client-level data sharing privileges will be set as in the Global Sharing Policy in this document.

All agencies "opt-in" by signing the Acknowledgement of Receipt of the KYHMIS Statewide Policy Manual annually. The original agreement is to be provided to the CoC HMIS Lead Agency with a copy being retained by the participating agency.

Agencies wishing to "opt-out" of sharing information electronically though the KYHMIS are required to complete a Data Sharing Exit Agreement signed by the Executive Director stating their reasons for opting out and submit it to the CoC HMIS Lead Agency. Sharing of information ends on the date the participating agency signs the Exit Agreement. All client information shared prior to the Exit Agreement date will continue to be shared.

At a minimum, CoC HMIS Lead Agencies will:

- Define each user's access type as described in the Access section of this manual.
- Conduct random file checks for appropriate client authorization based on participating agency risk determination.
- Conduct random user audit reports.

Participating Agency Executive Director

Policy:

The Executive Director is responsible for ensuring their agency and all licensed users within their agency abide by all CoC established regulations, standards, policies, and procedures regarding the KYHMIS and clients' rights.

CoC HMIS Lead Agencies will ensure that the Executive Director complies with applicable funding agreement requirements regarding the KYHMIS participation. In addition, they will ensure the Executive Director completes and submits the KYHMIS User Agreement for each user, KYHMIS Agency Agreement, KYHMIS Annual Agency Privacy and Security Monitoring Form, and Data Sharing Exit Agreement (if applicable). These forms must be reviewed and signed on an

annual basis. Failure to comply may result in deactivation of all participating agency user accounts and the participating agency may be non-compliant with HUD and/or other funding regulations.

Ultimately Responsible

Policy:

The Executive Director is ultimately responsible for compliance with the KYHMIS Statewide Policy Manual along with any CoC level supplemental policies, which includes but is not limited to knowledge and understanding of client rights, grievance procedures, data sharing, agency security, and all actions and work conducted by licensed users in their agency, including those no longer employed at their agency.

Executive Directors are ultimately responsible for:

- Verifying and signing all reports or information distributed by their agency for submission or publications.
- Notifying CoC HMIS Lead Agency prior to or within 24 hours if a user should be removed from the KYHMIS.
- Completing, signing, and submitting KYHMIS required documentation annually or upon request.
- Adhering to any additional requirements that may be deemed necessary by the funder or the CoC.

Failure to comply may result in deactivation of all participating agency user accounts and the participating agency may be non-compliant with HUD and/or other funding regulations.

Agency Administrator

An Agency Administrator is the liaison between CoC HMIS Lead Agencies and all other participating agency users. CoC HMIS Lead Agencies shall ensure they have a valid, up-to-date email address for each of their Agency Administrators and shall set their User Role as that of "Agency Administrator" in the KYHMIS.

System Management

Policy:

Agency Administrators will assist, as needed, CoC HMIS Lead Agencies in implementation of system upgrades, report development, and system testing. Agency Administrators will also be responsible for disseminating all information to users within their agency.

Agency Management

Policy:

The Agency Administrator will be responsible for updating, correcting, and maintaining the participating agency information in the KYHMIS.

CoC HMIS Lead agencies will train Agency Administrators on how to change and update information regarding their agency and all projects within their agency and require the information is verified and updated as needed. Failure to comply in maintaining correct participating agency and project information in the KYHMIS will result in suspension of all participating agency licenses until corrections are made and the participating agency may be non-compliant with HUD and/or other funding regulations.

Report Management

Policy:

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

CoC HMIS Lead Agencies will ensure Agency Administrators have knowledge and understanding of reports, due dates, submission dates, and the appropriate person/agency for submission.

If the Agency Administrator has concerns and/or questions regarding any of the participating agency's reports, the Agency Administrator will be required to submit a ticket to the KYHMIS Partner Agency Portal 7 days prior to final submission of report. Failure to submit a ticket within the appropriate time frame may result in CoC HMIS Lead Agencies not having adequate time to render assistance. CoC HMIS Lead Agencies will not be held liable for failure to render timely solutions when there is less than 7 days to respond.

User

A licensed KYHMIS User is responsible for ensuring their participating agency's client-level data is entered correctly and complies with all client rights, confidentiality, and data sharing in compliance with CoC regulations, standards, policies, and procedures. CoC HMIS Lead Agencies will provide the appropriate training for users as outlined in the "Training" section of this manual.

Client-Level Data

Policy:

CoC HMIS Lead Agencies will ensure that users will not knowingly enter false or misleading information under any circumstances into KYHMIS regarding the participating agency, project, or client.

When requesting reports from a participating agency, CoC HMIS Lead Agencies will require Agency Administrators to review and verify the report prior to submission. If issues concerning client-level data are raised, CoC HMIS Lead Agencies may conduct a data audit and a monitoring site visit. Failure of a participating agency or user to comply or proof of a violation can result in deactivation of the user's license permanently.

Ethical Data Use

Policy:

Data contained in the KYHMIS will only be used to support the delivery of services. Each KYHMIS licensed user will affirm the principles of ethical data use and client confidentiality by signing this document.

Any individual or participating agency misusing or attempting to misuse KYHMIS will be denied access. Without limitation the failure to comply with the policies and procedures related to the KYHMIS may subject the participating agency to discipline and termination of access to the KYHMIS and/or termination of other KHC contracts. Other funders will be notified by KYHMIS staff of failure to comply.

Data Sharing

Policy:

CoC HMIS Lead Agencies will ensure that at no time shall a licensed user alter, change, or delete other agencies' data in compliance with the data-sharing policies. At a minimum, they shall communicate with the other agency; whereby both agencies involved in the disputed accuracy of data are consulted and a joint resolution reached.

Client Release of Information

Policy:

Users **must** obtain a verbal or signed [Client Acknowledgement and Release of Information](#) document for each client prior to entering data into the KYHMIS for client information that will be shared.

Users **must** supply the KYHMIS client record with an end date (365 days from entry) for each release of information. Recovery Kentucky client records must have an end date not exceeding two years from entry.

If the Client Acknowledgement and Release of Information has expired, the user **must** obtain a new release prior to updating records.

Verbal and signed Client Acknowledgement and Release of Information forms **must** be secured and retained for seven years from the date of the last service for the client.

Data Standards

Policy:

Users must enter all data into the KYHMIS or, if applicable, a comparable database in accordance with the current HUD Data Standards.

CoC HMIS Lead Agencies shall ensure all users have access to and understand the most current [HUD Data Standards Notice](#).

Clients

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

Denial of Service

Policy:

No client shall be denied a service for declining to release information or refusal to answer informational questions not required for service eligibility screening.

Prior to collecting client-identifying information by the participating agency, clients **must** first sign or verbally (not for BoS agencies) agree to the Client Acknowledge and Release of Information document, acknowledging their request to share or deny sharing of information.

Access to Data

Policy:

Clients may have access to their data at any time and can ask for detailed explanation of the information given to them.

Clients may submit a written request for a printed report of their data in KYHMIS to the CoC HMIS Lead Agency.

Changing Information

Policy:

Clients may request that agencies update incomplete and/or incorrect data. However, agencies have the right to deny this request.

Procedure:

Contact CoC HMIS Lead Agency to determine validity of request to update or correct data in KYHMIS.

Denial of Access

Policy:

CoC HMIS Lead Agencies and participating agencies reserve the right to deny access to an individual's personal KYHMIS records for any of the following reasons. The denial is required to be documented, including original request and reason for denial.

- Information compiled in reasonable anticipation of litigation or comparable proceedings.
- Information about another individual (other than a health care or homeless provider).
- Information that by disclosure would be reasonably likely to endanger the life or physical safety of any individual.

Educating Clients of Privacy Rights
Policy:

The participating agency employee that obtains data from the client will work with the client to understand their privacy rights, benefits of sharing data, and what their data is used for once entered into KYHMIS. CoC HMIS Lead Agencies are not liable for client-level data that has been entered into the KYHMIS by a user in which the client's right to privacy was violated.

At a minimum, CoC HMIS Lead Agencies shall ensure participating agencies:

- Make the "Privacy Notice" available to the client upon request.
- Are knowledgeable regarding data-sharing policies, release of information policies, and security of data.

Client Denial to Share

Policy:

Clients have the right to choose not to have their data shared.

A participating agency that has a data sharing agreement with other participating agencies must lock down this client's record to be visible only to the participating agency that originally entered the data.

The participating agency must contact the CoC HMIS Lead Agency prior to entering client level data into KYHMIS for instructions on how to set the visibility settings appropriately.

Communication

Between KYHMIS Staff and CoC HMIS Leads

Policy:

KYHMIS Staff are responsible for relevant and timely communication with each CoC HMIS Lead Agency in the statewide implementation regarding all aspects of the KYHMIS, reporting, and data standards. CoC HMIS Lead Agencies are responsible for relevant and timely communication with participating agencies.

KYHMIS staff will provide communication through:

- Regularly scheduled System Administrator Meetings.
- Regular publications of KHC's eGram.
- Email notification.
- KYHMIS System News.
- FAQs, tip sheets, documentation, policies, procedures, reporting matrix, and general help published on the KYHMIS Partner Agency Portal at https://kyhmis.zendesk.com.

KYHMIS Partner Agency Portal

KYHMIS BOS staff maintains a user Partner Agency Portal referred to as "Zendesk." The goal of Zendesk is to operate in an effective and efficient manner assisting users in the order in which the tickets were submitted. The KYHMIS has over 500 users and 1500 projects. By requesting assistance through the Partner Agency Portal, users receive documentation of their ticket submissions and responses from CoC HMIS Lead Agency Staff.

Policy:

Participating agencies' users will submit requests for specific research data, system enhancements, technical support, helpful hints, training tips, documentation to download, password reset requests, etc. to the KYHMIS Partner Agency Portal.

The Partner Agency Portal shall be available from 8a.m. to 4:30 p.m. ET, Monday through Friday, excluding KHC holidays. CoC HMIS Lead Agencies will respond to Partner Agency Portal submissions from their respective CoC. The following guidance is applicable to the process to be followed by each CoC HMIS Lead Agency:

- Tickets will be addressed in the order of receipt.
- Tickets will be addressed within 3 business days.
- All Partner Agency Portal tickets received after 4 p.m. ET will be addressed the next business day.

Tickets asking help to identify or resolve issues with reports **must** have the report in question attached to the ticket. Failure to attach the report will result in a delay in the response to the ticket. Tickets asking for a custom report should follow the guidelines outlined in the Data Analysis Policies and Procedures.

When necessary, KHC Lead Agency will elevate tickets to the KYHMIS Committee and/or software vendor for resolution.

Access

KHC and CoC HMIS Lead Agency Staff

Policy:

KHC and CoC HMIS Lead Agency staff will have access to retrieve all data in the KYHMIS. Access to individual client-level data will only be for the purpose of direct client service-related activities, reporting/maintenance, checking data quality, and responding to Partner Agency Portal Tickets.

The CoC Lead staff will oversee all reporting to HUD and the public. All special research requests will be handled directly by the CoC Lead in coordination with the requesting participating agency. All information collected and analyzed will not be shared with others without the written consent of the requesting participating agency.

User Access

Policy:

Each CoC HMIS Lead Agency will be responsible for assigning user access for the agencies within the geographical designation of their Continuum.

Public Access

Policy:

CoC Lead Agencies will address all requests for data from entities other than participating KYHMIS agencies and HUD-funded VSPs or clients. The public is not given access at any time.

Procedure:

- The KYHMIS can enter into data-sharing agreements with outside organizations under contract with KHC for:
  - Research.
  - Data Matching.
  - Evaluation of Services/Planning.

- Contracts must include an MOU or MOA. Any MOU or MOA initiated and executed by CoC Lead Agencies must be communicated to KHC.
- Data-sharing agreements will require that all parties certify that they will adhere to the strict standards of protecting client-level data employed by the KYHMIS.
- All public requests for information must be made in writing to KYHMIS staff.
- KYHMIS staff will issue periodic public reports about homelessness and housing with no previous notice to participating KYHMIS or HUD-funded VSP agencies. Such public reports will not reveal identifying information at the client-data level.

Security

WellSky

System Security

Policy:

KHC shall ensure that WellSky maintains the highest level of system security for the Community Services software and hardware.

WellSky employees who have access to client-level data are subject to a national background check, training on confidentiality requirements, and must sign a confidentiality statement as part of their employee agreement.

The system function logs the time and type of activity, as well as the name of the user who viewed, added, edited, or deleted the information.

Servers are in complexes with:

- 24-hour security personnel.
- 24-hour video surveillance.
- Dedicated and secured Data Centers.
- 24-hour lock down.
- Management-controlled key access.
- No access for cleaning staff.
- State-of-the-art HVAC and fire suppression systems.

Data Security/Disaster Plan

Policy:

KHC shall ensure that WellSky maintains the highest level of data security for the Community Services software.

The traffic that flows between the server and the user's workstation is encrypted using the SSL certificate installed on KHC's dedicated server. Database tape backups are performed nightly. Seven days' backup history is stored on instantly accessible Raid 10 storage with one month's backup history being stored offsite.

KYHMIS staff have 24/7 access to the WellSky emergency line to provide assistance related to outages or downtime.

Unauthorized Access

Policy:

KHC shall ensure WellSky has processes in place to address unauthorized access.

If an unauthorized entity were to gain access to the KYHMIS and client data, or if there were suspicion of probable access, WellSky would take the following steps:

- The system would be examined to determine the presence of system or data corruption.
- If the system has been compromised, the system would be taken offline.

- Using the previous night's backup, a restored copy of the system data would be loaded onto another server, and the system brought back online with the back-up copy.
- Comparing the back-up database to the database taken offline, an investigation would be launched to determine the extent of the unauthorized activity/corruption and the corrective action needed.
- Upon completion of the investigation, findings would be reported to KHC, and options would be discussed.
- Upon KHC's approval, corrective action would be initiated. Corrective action could include all or part of the following:
  - The original hard drive would be completely erased and rebuilt, including a new operating system, SSL Certificate, applications, and back-up database.
  - If applicable and feasible, lost data from the original database would be restored.

Licensed Users

User Access

Policy:

A newly licensed user must sign and submit required documentation prior to receiving access to the system. All licensed users must re-submit required documentation annually.

CoC HMIS Lead Agency staff will provide unique usernames and temporary passwords to each licensed user that has completed the minimum training requirements as outlined in this manual. Each user will create a unique password of their own choosing upon initial log-in. Passwords should be reset at a minimum of every 45 days.

Users will keep passwords confidential. Usernames and passwords may not be exchanged or shared with other users. The sharing of usernames is a breach of the KYHMIS Policies and Procedures. Exchanging usernames seriously compromises security and accountability to clients. If a breach occurs, it may subject the participating agency to discipline and termination of access to the KYHMIS and/or termination of other KHC contracts.

WellSky, KHC, and CoC HMIS Lead Agency staff are not liable for actions of a former participating agency employee with an active license if the participating agency fails to give notification of termination prior to or within 24 hours of that termination.

Password Recovery

Policy:

> CoC HMIS Lead Agencies will only reset forgotten passwords after verification of user access status. Reset information is preferred to be sent via Partner Agency Portal Ticket and not by direct contact. Response to the request will be sent back through the Partner Agency Portal.

Location of Data Access

Remote Access

Policy:

> Users will ensure the confidentiality of client data, following all security policies and adhering to the standards of ethical data use, regardless of the location of the connecting computer. KYHMIS is intended to be accessed only on-site from the participating agency's network, desktops, laptops, and minicomputers that are Web capable.

> In special circumstances, user access from remote locations may be permitted after approval by Agency's leadership - Agency is responsible for approving the use of personal devices such as, but not limited to: cell phones, tablets, laptops, desktops, etc. All users that access KYHMIS remotely must meet the standards detailed in the security policies and procedures and may only access it for activities directly related to their job. All devices should be password protected and agency approved.

> Examples of Remote Access:

> 1. Personal laptops that were not purchased by the participating agency.
> 2. Access to the KYHMIS on a network other than that of the participating agency.
> 3. Private home desktops.
> 4. Agency-designated mobile, tablet, and approved devices.

> The agency Executive Director has the responsibility to ensure the user follows this and all other policies, procedures, agreements, and rules governing KYHMIS.

Agency Data

Data Retrieval

Policy:

KYHMIS-participating agencies will have access to retrieve any individual client-level data and aggregate data for their own projects. Participating agencies will not have access to retrieve client-level or aggregate data for other participating agencies or system-wide.

Agency Administrators and Users using the Community Services Report Writer, or Business Objects (SAP), will only be able to extract data from those records to which they have access based on their level of security given by the CoC's HMIS Lead Agency staff. Whenever a user attempts to access an aggregate report for unauthorized data, the report will show "0". Both Report Writer and Business Objects (SAP) will limit the user access and only report data from records to which the individual user has access.

Extracted Data

Policy:

KYHMIS-participating agencies have access to retrieve any individual client-level data and aggregate data for their own projects and download the information onto a local storage vessel. Users will maintain the security of any client data extracted from the database, including data used in custom reporting.

Compliance Security Review

Policy:

KYHMIS-participating agencies are subject to random or scheduled compliance monitoring checks completed by KYHMIS CoC.

Scanned Document Management

Policy:

KYHMIS staff is responsible for organization and management of the KYHMIS. The following standardized procedures to upload documents must be followed to ensure uploaded information is useable system wide.

- Documents uploaded to a client must have the naming standards of:
    - Client ID#, Document Title, Date Saved
    - For Example: 123456, Homeless Verification, 11/20/2013
- File attachments may only be uploaded to the client profile screen under "File Attachments."
- Users may never remove documents of another participating agency and may only remove theirs when uploading an updated version or removing incorrect information.

- Unless otherwise noted by an opted-out data sharing project or a client denial, all file attachments will be shared system-wide.

Globally Shared Information

Policy:

KHC and the CoC HMIS Lead Agencies have set sharing standards for each area of KYHMIS. At any time, a CoC HMIS Lead Agency may choose to close or share a section for privacy protection or coordinated assessment needs. The intent of KYHMIS is to allow as much data sharing as appropriate and necessitated by clients' needs and services provided to meet those needs.

Data Quality

The Data Standards established by HUD and KHC are applied to all participating agencies' projects reporting client-level data in KYHMIS. To have correct, accurate, and reliable reporting in a timely manner, CoC HMIS Lead Agencies are required to ensure all participating agencies adhere to the policies and procedures established. Each CoC is required to review their data and ensure data quality and accuracy to submit annual Performance Measurements to HUD.

Required Data Collection Fields

Policy:

All KYHMIS-participating agencies and all HUD-funded VSP agencies must comply with the current Data Standards set by HUD and participating federal partners.

The current HUD Data Standards can be found on HUD's website at the link provided.

CoC KYHMIS Lead Agencies will ensure:

- All projects are entering all data fields that appear on their client entry, interim, exit, and follow-up fields to allow for required reporting and analysis to occur.
- Users are trained to follow the correct workflow for the project. When a user does not complete the correct fields in the correct workflow, reports will reflect "nulls," "missing," or "non-HUD acceptable" errors.
- All projects are aware they have the option to complete more data assessment fields. CoC KYHMIS Lead Agency staff will establish additional assessment fields when such requests are received by the Housing Contract

Administration Partner Agency Portal or requested directly to their KYHMIS System Admin.

- All CoC KYHMIS Leads should share information regarding new implementations, major updates, etc. added to the system prior to adding them to the live site. This information must meet system requirements and be approved via discussion in system admin meetings.

Data Entry Time Limits

Policy:

Participating agencies should enter client-level data in real time to maintain the referral process and records on services rendered. However, agencies **must** enter all client-level data within three business days of occurrence or from when participating agency obtains the data.

Data Accuracy

Accuracy is defined as reports run by participating agencies with no errors or missing items flagged. Data Accuracy means that the data entered KYHMIS reflects the clients' situations and information shared by the client as closely as possible. Data Accuracy is also outlined in the [KHC Data Accuracy Monitoring Plan](#) that is available on our HCA Partner Agency Portal.

Policy:

Participating agencies must strive for high data accuracy and integrity on all reports.

CoC HMIS Lead Agencies shall set policies for participating agencies self-monitoring. These policies should include the requirement for submission of specific data reports (i.e., Data Quality Framework, APR) that show appropriate accuracy. The policy shall also include consequences for failure to submit accurate reports and a timeline for the agencies to correct the reports.

Housing Inventory Count

Policy:

Each CoC HMIS Lead Agency is responsible for completing the Housing Inventory Count (HIC) for their CoC.

- Projects deemed emergency shelters, transitional housing, Rapid Re-Housing or Permanent Housing projects **must** submit a Housing Inventory Count form

to their CoC Lead Agency on the designated day following the Point-in-Time Count.

- Projects must show a bed utilization rate that is above 65 percent and less than 105 percent, per HUD standards. The Executive Director or designated person must submit a written explanation with the form if the project is below or above said HUD standards.
- If an agency does not submit or comply with above standard, the CoC Lead Agency will contact the Executive Director within five business days of due date. The Executive Director or designated person will have five business days to comply.
- If an agency does not re-submit an accurate report after five business days, the appropriate CoC Lead Agency staff will notify the funder and all agency user licenses will be suspended.
- Failure to comply with these standards will result in suspension of all licensed agency users, as well as the possible suspension of draw requests.

License Suspension and/or Replacement

Policy:

At any time, the CoC HMIS Lead Agency reserves the right to suspend a user's license if a user is having difficulty entering client-level data and providing accurate reports. The CoC HMIS Lead Agency can require additional training and if unsuccessful, can require the Executive Director to assign a different staff member to attend training, become licensed, and enter client-level data. KHC is to be notified of any user license suspension.

Violation of Data Quality and Integrity

Policy:

In their discretion, each CoC may hold funds or deduct points on future grant applications for agencies that violate the data quality policies and procedures.

Licensing and Invoicing

To carry out its responsibilities as the lead system administrator for the KYHMIS, KHC has secured funding through the Kentucky BoS CoC project funds. By seeking to maximize these resources, KHC has been able to keep Community Services user fees at an affordable level. Agencies that receive federal funds but are exempt from participating in the KYHMIS pay a nominal data collection fee to help cover the costs of handling data that does not come through the KYHMIS but is analyzed and combined with KYHMIS data for reporting. KHC addresses the annual licensing and invoicing for the Louisville CoC and the Lexington CoC through Memorandums of Understanding.

Policy:

Agencies that received federal funds through Kentucky BoS will pay a set annual fee per year, per user. Agencies that wish to participate in KYHMIS but do not receive federal funds through Kentucky BoS will pay a lower fee to participate in KYHMIS ($100 for two users). These agencies can request a hardship if needed. A letter explaining the hardship is required when becoming a licensed agency. These agencies will still be required to participate in Data Quality requirements. If the non-funded agencies' Data Quality is maintained at an acceptable level for over a year, the following year's fee could be waived. The non-funded agencies must sign a document stating they understand that they are required to meet the Data Quality Standard set forth by the CoC. The form can be found at the end of the Policies and Procedures Manual.

PLEASE NOTE: Prior to KHC issuing HMIS invoices to agencies, there will be notifications and reminders listed in KHC eGrams several times. Agencies are encouraged to read each eGgram and look for articles announcing upcoming HMIS invoicing.

Annual Invoice

Policy:

In late June of each year, KHC staff will process an Annual Invoice to each agency in the BoS and the Lexington CoC. (The Louisville CoC will invoice their member agencies separately.) In early June, KHC will encourage all agencies to confirm the number of annual user licenses they will need for the upcoming fiscal year. It is the responsibility of the agency to notify KHC KYHMIS staff of any change in the number of licenses that will be invoiced.

The Annual Invoice will be emailed to agencies using the online PNC Payment System (https://www.payerexpress.com/ebp/KHC/). The email will be sent to the identified contact person in the payment system. It is the responsibility of each agency to enroll in the payment system, to enter the required banking information, and to ensure that the contact person is correct or to make any necessary changes in the system.

When the agency receives the invoice, they will need to log on to the payment system and initiate payment by electronic payment. No paper checks will be accepted by KHC. If any paper checks are received, they will be returned to the agency unprocessed.

Any invoice unpaid by the due date will be assessed a 10% late fee. Any invoice still unpaid after 30 days will be assessed an additional 10% late fee. Any invoice remaining unpaid after 60 days will require the KHC KYHMIS staff to suspend the agency's usage of the KYHMIS system. If an agency's usage has been

suspended, KHC will not process any draws for payment of any grant or program administered by the agency until the invoice is paid in full and the user licenses are activated.

All Victim Service Providers (VSP) agencies will receive an annual data maintenance invoice due on the same schedule listed above.

Quarterly New User Fee Invoices

Quarterly, KHC will also issue a New User Fee Invoice for each agency that added a new user during the previous quarter. A new user is defined as an additional license not billed during the annual invoice process. If a new staff member of the agency replaces a previous staff person and assumes their user license, they are not a new user. An additional license is necessary to add a new user.

New user invoices will be calculated on a pro-rated basis beginning on the first day of the full month after their license was activated. Late fees will be assessed if any New User Fee Invoice remains unpaid 30 days after the invoice was issued. Additional late fees will be assessed after 60 days, and all agency user licenses will be suspended after 90 days and will remain suspended until the invoice is paid in full.

All processes for issuing the New User Fee Invoice and the process for agency's paying the invoice will be the same as listed above for the Annual Invoice.

Grievances

From a Participating Agency or Client

Policy:

KYHMIS-participating agencies have the right to file a written grievance against KHC or the CoC HMIS Lead Agency. Clients also have the right to file a grievance against a participating agency regarding the KYHMIS. Each CoC HMIS Lead Agency must have a grievance policy on file with KHC.

The CoC HMIS Lead Agency grievance policy must include:

- Definition of categories of grievances.
  - o Client grievances.
  - o Participating agency grievances.
  - o HUD-funded VSP grievances.
- Specific steps to be followed for grievance submission.
- Process that will be followed to resolve the grievance.
- Appeal process of the grievant.

Participation Termination

Initiated by the Participating Agency

Policy:

The KYHMIS termination of a participating agency may affect their relationship with their funder. However, in the event of termination, all data entered into KYHMIS will remain an active part of the KYHMIS, and the records will retain their original security settings. CoC KYHMIS Lead Agencies are required to notify KHC upon receipt of a request for termination of contract.

Prior to be granted termination from KYHMIS, the participating agency must ensure all clients are properly exited from the terminating agency's program.

Initiated by CoC HMIS Lead Agency

Policy:

CoC KYHMIS Lead Agencies and KHC reserve the right to terminate the KYHMIS Participation Agreement for non-compliance with the terms of that agreement. CoC HMIS Lead Agencies are required to give a participating agency written notice of the intent to terminate and provide a minimum of 10 days for the participating agency to rectify any violations. If termination does occur, the CoC KYHMIS Lead Agency is required to notify KHC of the termination and provide documentation of termination justification. In all cases of termination, CoC HMIS Lead Agency staff will make inactive all users from the participating agency on the date of termination. All client-level data entered into KYHMIS will remain an active part of the KYHMIS, and the records will retain their original security settings.

Initiated by CoC HMIS Lead Agency for Inactive Users

Policy:

Users **must** log into KYHMIS at least once every 90 days to maintain an active license.

CoC HMIS Lead Agencies shall review user activity and will notify the agency and any funder of the program when a user has not accessed KYHMIS for 90 days or longer. The agency will have 10 days to address the inactivity and CoC HMIS Lead Agencies will deactivate the user's license permanently if the issue is not resolved.

Users and agencies are encouraged to notify their CoC HMIS Lead Agency if a user is anticipated to be away for an extended period which might result in them being out of compliance with this policy.

Projects in KYHMIS

Adding a New Project in KYHMIS by Agency

Policy:

The Executive Director or Agency Admin will notify the CoC Lead Agency staff 30 days prior to implementation of a new project.

Procedure:

- At least 30 days prior to anticipated implementation date, the Agency Admin or the Executive Director will submit a detailed account of the project to the KYHMIS Help Desk including but not limited to:
    - Name.
    - Address.
    - Contact Information.
    - Services Delivered.
    - Type of Housing/Service Project.
    - Eligibility Criteria.
    - A list of users.
    - Location of project.
    - Service Area.
    - Funding Source.
    - Goals for using the KYHMIS.

- CoC Lead Agency staff will ensure the following standard formula is used when creating a name within KYHMIS:
    - Parent Agency-Project Name-Funding Source-Type of Service-CoC.
    - Example: KHC-Joe's House Step Two-CoC-PSH-BOS
- CoC Lead Agency staff will present the completed request form and recommended program name to the Agency Admin or Executive Director for approval.
- The Agency Admin or Executive Director will have five business days to communicate changes or corrections.
- CoC Lead Agency staff will complete set-up at least seven business days prior to the implementation date for final approval from the agency.

Making Changes to Existing Projects in KYHMIS

Policy:

The Agency Admin or Executive Director will notify CoC Lead Agency staff of programmatic changes.

Procedure:

- The Agency Admin or Executive Director will notify CoC Lead Agency staff of any applicable programmatic changes to existing programs which may influence data collection, data entry, data quality, or data reporting at least 45 business days prior to the implementation date of the change.
- Recommendations and timelines for the changes will be returned to the agency no more than ten business days from receipt date of request.
- CoC Lead Agency staff will complete changes at least seven business days prior to the implementation date for final approval from the agency.

Additional Customization

Policy:

The participating agency will be solely responsible for additional database customization costs. This includes the voluntary transfer of existing project client-level data and custom-built reports beyond that of KYHMIS staff's scope of work.

Procedure:

- The Agency Admin or Executive Director will notify CoC Lead Agency staff of any applicable programmatic customization which may influence data collection, data entry, data quality, or data reporting at least 45 business days prior to the implementation date of the change.
- If support from WellSky is necessary to make the changes, CoC Lead Agency staff will communicate to WellSky the needs and scope of work for the agency.
- Recommendations and timelines for the changes will be returned to the agency no more than 10 business days from receipt date of request, including a Statement of Work from WellSky, if applicable.
- CoC Lead Agency staff will complete changes at least seven business days prior to the implementation date for final approval from the agency.
- If an agency voluntarily transfers an existing project to another agency, KHC will not pay for client-level data to be transferred. The agency requesting the transfer will be liable for any fees incurred.

Acronyms

AIRS – Alliance of Information and Referral Systems

AHAR – Annual Homeless Assessment Report

APR – Annual Progress Report

BoS – Balance of State Continuum of Care

CDBG – Community Development Block Grant

CHO – Contributing Homeless Organization

CoC – Continuum of Care

DOB – Date of Birth

DV – Domestic Violence

ES – Emergency Shelter

ESG – Emergency Solutions Grant

HHS – The U.S. Department of Health and Human Services

HOPWA – Housing Opportunities for Persons with AIDS

HUD – U.S. Department of Housing and Urban Development

I&R – Information and Referral

KHC – Kentucky Housing Corporation

KYHMIS – Kentucky Homeless Management Information System

LEX – Lexington/Fayette County Continuum of Care

LOU – Louisville/Jefferson County Continuum of Care

MCO – Managed Care Organization

MH – Mental Health

NOFA – Notice of Funding Availability

PATH – Projects for Assistance in Transition from Homelessness

PIT – Point in Time Count (K-Count)

PKI – Public Key Infrastructure

PPI – Personal Protected Information

PSH – Permanent Supportive Housing

RHY – Runaway and Homeless Youth

RKY – Recovery Kentucky Project

ROI – Release of Information

S+C – Shelter Plus Care (McKinney-Vento Act Project)

SA – Substance Abuse

SHP – Supportive Housing Program

SO – Street Outreach

SOAR – SSI/SSDI Outreach, Access, and Recovery

SRO – Single Room Occupancy

SSN – Social Security number

SSDI – Supplemental Security Disability Income

SSI – Supplemental Security Income

SSO – Supportive Services Only

SSVF – Supportive Services for Veteran Families

TA – Technical Assistance

TANF – Temporary Assistance for Needy Families

TH – Transitional Housing

VA – Veterans Affairs Administration

VAWA – Violence Against Women Act

VSP – Victim Service Provider

XML – Extensible Markup Language