2023 Program Review and Certification Standards
M. Data Collection and Homeless Management Information System (HMIS)

New requirements are in red text and do not apply for the 2023 PR&C review. These requirements will be applicable in 2024.
Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2023 PR&C review.
Bold are requirements that now apply for the 2023 PR&C review.

Standard M1	Guideline M1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency does not share HMIS data with any agency that has not entered into a HMIS agreement with CSB.	☐ The agency has a written policy that precludes unauthorized data sharing. The policy is available for review. ☐ All data requests must be addressed with CSB. A written request specifying what data is to be shared must be submitted to CSB for approval.	☐ <u>Policy Review</u>: CSB reviewed agency policy. ☐ <u>Discussion</u>: CSB discussed compliance with agency staff.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs
Discussion and Basis for Conclusion						

Standard M2	Guideline M2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency collects, enters, and extracts only HMIS data that is relevant to the delivery of homeless services.	☐ The agency has a written policy available for review on data collection, entry, and extraction that specifies appropriate use of data. ☐ The agency maintains the confidentiality of records pertaining to any client who	☐ <u>Policy Review</u>: CSB reviewed agency policy. ☐ <u>Discussion</u>: CSB discussed compliance with agency staff.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant		1	All programs

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			N/A			
	☐ The agency maintains the confidentiality of the address or location of any family violence project.					

Discussion and Basis for Conclusion

Standard M3	Guideline M3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency collects HMIS data by lawful and fair means and, where appropriate, with the knowledge or consent of the individual.	☐ The agency has a written policy requiring this data to be collected in accordance with applicable law. ☐ Consent of the individual for data collection is inferred from the circumstances of the collection, **even if the individual refuses to sign a Client Acknowledgement Form.** ☐ The Client Acknowledgement Form is available in HMIS and staff is knowledgeable about the policy.	☐ Policy Review: CSB reviewed agency policy.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

Discussion and Basis for Conclusion

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Standard M4	Guideline M4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency posts a sign at each intake desk (or comparable location) that explains the reasons for collecting information. For remote intakes data collection notice must be given to clients verbally and displayed on the data collection form.	☐ The sign contains the following language: "We collect personal information directly from you for reasons that are discussed in our privacy policy. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless individuals, and to better understand the needs of homeless individuals. We only collect information that we consider to be appropriate. If you would like to see our privacy policy, our staff will provide you with a copy."	☐ <u>Other</u>: CSB reviewed signage.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs
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Standard M5	Guideline M5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Protected Personal Information (PPI) and other HMIS data elements collected by an agency are relevant to the purpose for which it is used, accurate, and complete.	☐ Accuracy is defined as at least 95% of PPI and other HMIS data elements (except entry and exit dates) entered into HMIS matches data in client files, in accordance with HMIS Client Tracking and Quality Assurance Standards outlined in the CSB Data Reference & Dictionary. ☐ Information in client files matches HMIS data. ☐ The income of each tenant must be recorded at the time of admission into a program and must be verified at time of admission into a PSH program. ☐ Income for each tenant must be verified by third-party documentation (or self-certification as a last resort after attempts to obtain third-party documentation) at least annually, including obtaining proper income documentation for the client file. Annual	☐ Policy Review: CSB reviewed agency policy. ☐ File Review: CSB reviewed client files.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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	updates must occur within 30 days of the anniversary of the HoH's entry into the program. HMIS data confirms compliance with the 30-day timeframe for each individual data element. ☐ Where a program participant pays rent or an occupancy charge in accordance with 24 CFR 578.77, 24 CFR 578.103(a)(7) requires recipients and subrecipients to keep on file an income evaluation form specified by HUD along with one of the following types of back-up documentation: (1) source documents for the assets held by the program participant and income received before the date of the evaluation; (2) to the extent that source documents are unobtainable, a written statement by the relevant third party or the written certification of the recipient's or subrecipient's intake staff of the relevant third party's oral verification of the income the program participant received over the most recent				

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	period; or (3) to the extent that source documents and third-party verification are unobtainable, the program participant's own written certification of income that the program participant is reasonably expected to receive over the 3-month period following the evaluation. ☐ The agency has a written policy detailing how annual data assessment are tracked and monitored to ensure timely completion and input into HMIS.					

Discussion and Basis for Conclusion

Standard M6	Guideline M6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency accurately enters Project Start Dates and Project Exit Dates for all clients enrolled in their programs.	☐ Project Start Date and Project Exit Date accuracy is defined as 100% of the dates entered into HMIS match the dates in client files.	☐ File Review: CSB reviewed client files.	☐ Compliant ☐ Compliant with conditions		1	All programs

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			☐ Non-compliant			
			☐ N/A			

Discussion and Basis for Conclusion

Standard M7	Guideline M7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency accurately enters all required HMIS data elements for each client sheltered by 9am the following day, as specified in the Partnership Agreement.	☐ The agency has a written quality assurance plan available for review and verifies by 9am each day that all required HMIS elements were entered accurately for the preceding day. ☐ Manual Bed list information matches HMIS program roster information.	☐ File Review: CSB reviewed client files. ☐ File Review: CSB reviewed bed lists.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	Shelters

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Standard M8	Guideline M8	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a quality assurance plan for verifying data accuracy and timeliness of data entry. Data is entered in real time to the fullest extent possible.	☐ The agency has a written quality assurance plan and a process for verifying the files match the HMIS data. ☐ The agency verifies by the 4th working day of each month that all required HMIS data elements were entered completely and accurately. ☐ All efforts are made to ensure real-time data entry. An authorized HMIS user is on-site during hours of potential intake, including weekend and overnight shifts, if applicable.	☐ Policy Review: CSB reviewed the quality assurance plan. ☐ Other: CSB reviewed staffing patterns.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs
Discussion and Basis for Conclusion						

Standard M9	Guideline M9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency publishes and specifies in the	☐ The privacy policy is available for review.	☐ Policy Review: CSB reviewed the privacy	☐ Compliant		1	All programs

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privacy policy the purposes for which it collects PPI and describes all uses and disclosures of PPI. The agency provides a copy of the policy to any individual upon request. For remote intakes privacy policy notice must be given to clients verbally and displayed on the data collection form.	☐ The privacy policy requires staff to inform clients of the purpose for data collection and all client rights concerning the collection and use of their private information. The agency only uses and discloses information not covered in the privacy policy with the consent of the individual or when required by law. ☐ The agency states in the privacy policy that the policy may be amended at any time and those amendments may affect information obtained by the agency before the date of the change. The agency maintains permanent documentation of all privacy policy amendments. ☐ The agency may infer consent for all uses and disclosures specified in the policy and for uses and	policy and any amendments to the privacy policy. ☐ <u>Discussion</u>: CSB discussed compliance with agency staff. ☐ <u>Other</u>: CSB confirmed signage. ☐ <u>Other</u>: CSB reviewed the agency website.	☐ Compliant with conditions ☐ Non-compliant ☐ N/A			

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	disclosures determined by the agency to be compatible with those specified in the policy. ☐ The agency posts a sign or verbally notifies client stating the availability of its privacy policy to anyone who requests a copy. If the agency maintains a public web page, the current version of the policy is posted.					

Discussion and Basis for Conclusion

Standard M10	Guideline M10	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
With certain exceptions, the agency allows any individual to have a copy of his or her PPI. The agency considers any request by an individual for correction of inaccurate or incomplete PPI	☐ In the privacy policy, the agency may reserve the ability to rely on the following reasons for denying an individual inspection or copying of the individual's PPI: (1) information compiled in reasonable anticipation of litigation or comparable	☐ Policy Review: CSB reviewed the privacy policy. ☐ Discussion: CSB reviewed agency examples of correcting PPI, or discussed the procedures with agency staff.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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pertaining to the individual.	proceedings; (2) information about another individual (other than a health care or homeless provider); (3) information obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) if disclosure would reveal the source of the information; (4) information the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual; or (5) inability to establish individual's identity. ☐ The agency is not required to remove any information, but instead may mark information as inaccurate or incomplete and may supplement it with additional information. ☐ The agency can provide a policy for CSB review and					

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	staff can describe the procedure for requests for corrections. The agency may reject repeated or harassing requests for access or correction.					
	☐ If the agency denies an individual's request for access or correction, the agency explains the reason for the denial to the individual and includes documentation of the request and the reason for the denial as part of such individual's PPI.					

Discussion and Basis for Conclusion

Standard M11	Guideline M11	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a procedure for accepting and considering questions or complaints about its privacy policy and security practices.	☐ Staff can describe the procedure and if forms are used, they are available for review.	☐ <u>Discussion</u>: CSB discussed with agency staff.	☐ Compliant ☐ Compliant with conditions		1	All programs

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			☐ Non-compliant ☐ N/A			

Discussion and Basis for Conclusion

Standard M12	Guideline M12	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency requires each member of its staff (including employees, volunteers, affiliates, contractors, and associates) to sign a confidentiality agreement acknowledging receipt of a copy of the privacy policy and pledging to comply with the privacy policy.	☐ The signed confidentiality agreements are available for review.	☐ <u>File Review</u>: CSB reviewed signed confidentiality agreements.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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Standard M13	Guideline M13	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has completed a HMIS User Agreement for each authorized system user.	☐ HMIS User Agreements are up-to-date and on file in HMIS.	☐ <u>File Review</u>: HMIS system provides automatic compliance with this standard.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs
Discussion and Basis for Conclusion						

Standard M14	Guideline M14	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency does not store or display written information specifically pertaining to user access (e.g., user name, password) in any publicly accessible location. When workstations used to collect and store HMIS data are not in use and staff is not present, steps are taken	☐ Usernames and passwords are not displayed in any visible and accessible location. ☐ If an agency staff temporarily leaves their workstation, he/she uses the screen lock function to prevent unauthorized access from other individuals.	☐ <u>Discussion</u>: CSB discussed procedures with agency staff. ☐ <u>Other</u>: CSB inspected work areas.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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to ensure that the computers and data are secure and not accessible or usable by unauthorized individuals.	☐ After a short amount of time of non-use, workstations automatically turn on a password-protected screen saver. ☐ If staff from the agency will be gone for an extended period of time, they are required to log off the data entry system. ☐ Staff can describe and/or demonstrate the procedure.					
Discussion and Basis for Conclusion						

Standard M15	Guideline M15	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
HMIS users must not be able to log on to more than one workstation at a time or be able to access client level data from more than one location at a time if client level data is	☐ IT specialist can confirm compliance and compliance can be demonstrated.	☐ <u>Other</u>: CSB visually confirmed compliance. ☐ <u>Other</u>: CSB reviewed written annual confirmation from IT specialist.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant		1	All programs

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stored locally on the network. The agency secures all electronic HMIS data with a user authentication system consisting of a user name and a password.			☐ N/A			

Discussion and Basis for Conclusion

Standard M16	Guideline M16	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency supervises any paper or other hard copy containing PPI that is generated by or for HMIS. When supervision is not possible, the hard copy PPI will be secured.	☐ When the agency staff is unable to supervise any paper or hard copy document because they are not present, the information is secured in an area that is not publicly accessible.	☐ Other: CSB ensured that hard copies of PPI are secure when agency staff is not present.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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Standard M17	Guideline M17	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a written plan to dispose of or remove identifiers from PPI stored on agency computers and data storage devices that is not in current use seven years after the PPI was created or last changed (unless a statutory, regulatory, contractual, or other requirement mandates longer retention).	☐ To dispose of or remove identifiers or other HMIS data from data storage medium, the agency reformats the storage medium more than once before reusing or disposing of the medium. ☐ A written policy is available for review. ☐ Agencies using cloud-based storage services need to have a policy from the service provider showing compliance with data protection and proper disposal of physical media.	☐ Policy Review: CSB reviewed the written policy.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		2	All programs
Discussion and Basis for Conclusion						

Standard M18	Guideline M18	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency provides reasonable accommodations for persons with disabilities throughout the data collection process.	☐ Reasonable accommodations include, but are not limited to, providing qualified sign language interpreters or readers or providing	☐ Policy Review: CSB reviewed the policy. ☐ Discussion: CSB discussed compliance with agency staff.	☐ Compliant ☐ Compliant with conditions		2	All programs

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	materials in accessible formats such as Braille, audio or large type, as needed by the individual with a disability.		☐ Non-compliant ☐ N/A
	☐ The agency will provide required information in languages other than English that are common in the community if speakers of these languages are found in significant numbers and come into frequent contact with the agency.		
	☐ The agency can provide a policy for CSB review.		
Discussion and Basis for Conclusion			

Standard M19	Guideline M19	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency uses appropriate methods to monitor security systems.	☐ The agency limits access to information provided by HMIS to its own employees specifically for verifying eligibility for service, entering data for services provided,	☐ <u>Policy Review</u>: CSB reviewed the policy.	☐ Compliant ☐ Compliant with conditions		2	All programs

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	tracking client services, monitoring data quality, and evaluating programs. ☐ The agency has a written policy regarding access to the HMIS database that is available for review. The policy prohibits employees from using HMIS data in an unethical or unprofessional manner.		☐ Non-compliant ☐ N/A			

Discussion and Basis for Conclusion

Standard M20	Guideline M20	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency encrypts all HMIS data that is electronically transmitted over the Internet, publicly accessible networks, or phone lines to current industry standards.	☐ Unencrypted data may be transmitted over secure direct connections between two systems. A secure direct connection is one that can only be accessed by users who have been authenticated on at least one of the systems involved and does not utilize any tertiary systems to transmit the data. A	☐ Discussion: CSB discussed with agency staff how the agency secures electronically transmitted data.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		2	All programs

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	secure network would have secure direct connections. ☐ Encryption and data transmission policy is available for review. ☐ Staff can describe compliance.				

Discussion and Basis for Conclusion

Standard M21	Guideline M21	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency applies system security provisions to all the systems where PPI is stored, including but not limited to, the agency's networks, desktops, laptops, mini-computers, mainframes, and servers.	☐ The agency's IT specialist can confirm that these system security provisions are in place. ☐ All agency owned workstations, including laptops for remote staff, must have up-to-date antivirus software.	☐ CSB reviewed annual, written confirmation from IT specialist.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		2	All programs

Discussion and Basis for Conclusion

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Standard M22	Guideline M22	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency secures HMIS and stored HMIS data with a user authentication system consisting of a user name and a password.	☐ Written policy is available for review. ☐ IT specialist can confirm compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M23	Guideline M23	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency protects HMIS from malicious intrusions behind a secure firewall.	☐ Each individual workstation has its own firewall or there is a firewall between each workstation and any system, including the Internet and other computer networks located outside of the agency. ☐ The agency has a policy for review. ☐ IT specialist can confirm compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

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Standard M24	Guideline M24	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
If an agency uses public forums for data collection or reporting, at a minimum, HMIS must be secured to allow only connections from previously approved computers and systems through Public Key Infrastructure (PKI) certificates, extranets that limit access based on the Internet Provider (IP) address, or similar means.	☐ The HMIS system provides automatic compliance with this standard.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M25	Guideline M25	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
If the agency copies HMIS data on a regular basis to another medium (e.g., external hard drive) it stores the medium in a secure off-site location where the required privacy and security standards also apply.	☐ Agency backup information is securely stored. ☐ IT specialist can confirm compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

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Standard M26	Guideline M26	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
If the agency stores data in a central server or mainframe, it stores the central server or mainframe in a secure room with appropriate temperature control and fire suppression systems.	☐ IT specialist can demonstrate compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M27	Guideline M27	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Surge suppressors must be used to protect systems used for collecting and storing all of the HMIS data.	☐ IT specialist can confirm compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M28	Guideline M28	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Agencies that have systems that have	☐ The HMIS system provides automatic	Self-certification	☐ Compliant		3	All programs

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| access to any HMIS data maintain a user access log and logs are checked regularly. | compliance with this standard. | | ☐ Compliant with conditions

☐ Non-compliant

☐ N/A | | | |

Standard M29	Guideline M29	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency applies application security provisions to the software during data entry, storage, review and any other processing function.	☐ The HMIS system provides automatic compliance with this standard.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M30	Guideline M30	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency stores all HMIS data in a binary format.	☐ If the agency uses one of several common applications (e.g., Microsoft Access, Microsoft SQL Server, and Oracle), it is already storing data in binary	Self-certification	☐ Compliant ☐ Compliant with conditions		3	All programs

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	format, and no other steps are necessary.		☐ Non-compliant ☐ N/A			

CSB reviews Tier 1 standards annually and Tier 2 standards every 4 years. For years when CSB does not review Tier 2 standards, agency staff certifies compliance with both Tier 2 and Tier 3 standards in the 'Certifying Official' column.

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