**HUD SNAPS Technical Assistance Visit – San Joaquin Continuum of Care – CA-511**

**TDA Consulting Staff Dawn Lee and Margaret McFaddin**

**April 10-11, 2019**

**Meeting with Data and HMIS Committee – 4/10/2019**

**Members Present: Bill Mendelson (Chair), Adam Cheshire**

**Members Absent: Don Aguillard, Greg Diederich, Natascha Garcia, Jon Mendelson, Leslie Sena**

* Presented ***SJC Data and HMIS Committee,*** ***April 2019*** PowerPoint – (electronic version sent to Data and HMIS Committee on 4/16/2019)

Discussed with Bill the process of revising the HMIS policies and procedures.  TDA feedback on the documents was not received with enough time for review by entire Committee. Those suggested revisions are attached.  *Please find comments to Appendices A, B, C, D, E, F, G and the Policies and Procedures attached. As well, we have provided links to other communities which have generally done a good job in managing their compliance and/or have recently implemented stronger written documents.  The communities that we reference in the documents include Kings County (WA), Los Angeles, Riverside and Chicago. Know that as a result of the updated HMIS privacy guidance in the* [*CES Data and Management Guide*](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.hudexchange.info_resources_documents_coordinated-2Dentry-2Dmanagement-2Dand-2Ddata-2Dguide.pdf&d=DwMFAg&c=8FFiCzt4kgOMTwQG_FkG_2u6C0987wiOpsOhUzEkX4M&r=3jVb7J2bAquXzMgv8FNH644hROicGr7wcPDKDI6Gffo&m=6Xzfrok1Oy_0k2uadGka6jShADmSi4HWR0qJD867KbA&s=8UTL2aMB-YbKwjN8a8u0EuDWj3NxE2eQzc7kiXb3EOE&e=)*, CoCs  should be reviewing their documentation to ensure that it is congruent with HUD’s direction on privacy and security. My queries to the TA providers who work most closely to the issue didn’t elevate any communities that have fully completed the retrofit (and from whose documents SJC can excerpt verbatim), but the consensus is that on the whole overly restrictive privacy and security protocols that restrict a CES’ ability to house clients quickly will be tailored to make the system more effective.  Page 17 of the guide provides a useful decision tree that communities should use to drive their policies by assessing the level of consent needed to use or disclose clients personal information.*

* The committee should review their role according to Governance Charter. They are responsible for reviewing the HMIS MOU for compliance.
* Written documents need to be thorough and provide clarity as to who is responsible for what.
* Discussed challenge with Behavioral Health data entry and the ability to share data across the CoC.  The Data and HMIS Committee should discuss ways to work around (e.g. utilizing the Business Associate model or HIPAA-compliant Release of Information) barriers so that data can be shared as broadly as possible.
* The Committee should seek legal opinion on the effect of any California privacy or confidentiality laws or regulations on data collection, use and disclosure.  Electronic Privacy Information Center publishes guide of state privacy laws.  [https://epic.org/privacy/policy/](https://urldefense.proofpoint.com/v2/url?u=https-3A__epic.org_privacy_policy_&d=DwMFAg&c=8FFiCzt4kgOMTwQG_FkG_2u6C0987wiOpsOhUzEkX4M&r=3jVb7J2bAquXzMgv8FNH644hROicGr7wcPDKDI6Gffo&m=6Xzfrok1Oy_0k2uadGka6jShADmSi4HWR0qJD867KbA&s=g0vXTq9sYsC24lfKmZd74d3Q9YKhM0dUGLeIPCab9bo&e=).
* Need to be explicit between data uses and disclosures. Under HUD guidelines, research and coordinated entry are permitted uses and CoC does not need explicit consent from each client to disclose

**Bitfocus Demonstration**

The slides from the presentation are attached.  Beverly highlighted several data quality reports, that are stated on the slides.

**Data and HMIS Committee Recommendations**

* Set a regular meeting schedule and post with meeting agendas and minutes.
* Develop and implement a Data Quality Plan.
* Produce reports that demonstrate agency performance and service delivery.
* Collaborate with other standing committees to develop strategies for report usage.
* Develop written process for evaluating performance of HMIS Lead Agency that is open and transparent.  This could include a review of organizational charts and job descriptions of HMIS Lead Agency staff, while addressing any perceived or actual conflicts of interest.  See HMIS System Administrator [Checklist](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.hudexchange.info_resource_5815_hmis-2Dsystem-2Dadministrator-2Dchecklist_&d=DwMFAg&c=8FFiCzt4kgOMTwQG_FkG_2u6C0987wiOpsOhUzEkX4M&r=3jVb7J2bAquXzMgv8FNH644hROicGr7wcPDKDI6Gffo&m=6Xzfrok1Oy_0k2uadGka6jShADmSi4HWR0qJD867KbA&s=bqYNFwOu9y6h1PrnBto3ac9Jt2eAS_WxGhUr0dWu58I&e=).
* CoC Collaborative Applicant needs training to access HMIS system directly to produce reports.
* Investigate use of existing staff to produce data analysis reports using Looker or some other tool.  If additional training is needed, contact Bitfocus for assistance.
* Increase use of data reports to make informed decisions at all levels of CoC governance.  Solicit feedback from CoC Board on types of information needed.
* See [Comparable Database Decision Tree](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.hudexchange.info_resource_5743_hmis-2Dwhen-2Dto-2Duse-2Da-2Dcomparable-2Ddatabase_&d=DwMFAg&c=8FFiCzt4kgOMTwQG_FkG_2u6C0987wiOpsOhUzEkX4M&r=3jVb7J2bAquXzMgv8FNH644hROicGr7wcPDKDI6Gffo&m=6Xzfrok1Oy_0k2uadGka6jShADmSi4HWR0qJD867KbA&s=f3Ogl-jBpvNLLw2wjP5NQ3inCsVA6PRiyt788U1M65k&e=) for information.
* TDA will contact Bitfocus for ideas on community dashboards and then educate Committee.
* Clarify timing of point in time count of unsheltered homeless.   Both the CoC Governance Charter (page 6) and the Collaborative Applicant MOU (page 2) state the CoC will have an annual count.
* Develop HMIS implementation budget.
* Review and adapt HMIS written documents as needed and present to board for approval.