

ShelterNet

Policies and Procedures Manual



Homeless Management Information System Initiative
Broome County, New York

Updated 3/7/06

| | |
|---|-----------|
| INTRODUCTION AND GOALS | 3 |
| INTRODUCTION | 3 |
| GOALS | 3 |
| SECTION I. CONTRACTUAL REQUIREMENTS AND ROLES | 5 |
| SECTION 1.01 AGENCY ROLES AND RESPONSIBILITIES | 5 |
| A. All roles and responsibilities are in effect for the duration of the HUD agreement, that is, from October 2004 through September 2007..... | 5 |
| B. Lead Agency – Fairview Recovery Services, Inc. (FRS) | 5 |
| C. Participating Agencies | 6 |
| SECTION 1.02 AGENCY AND USER AGREEMENTS | 7 |
| A. Scope | 7 |
| B. Requirements | 7 |
| SECTION 1.03 PERSONNEL ROLES AND RESPONSIBILITIES | 7 |
| A. ShelterNet Project Administrator..... | 7 |
| B. ShelterNet Systems Administrator..... | 7 |
| C. Participating Agency Executive Director or Chief Executive | 8 |
| D. Participating Agency ShelterNet Representative | 8 |
| E. Staff/User..... | 9 |
| F. Staff Trainer..... | 9 |
| SECTION II. IMPLEMENTATION..... | 10 |
| SECTION 2.01 PLANNING | 10 |
| A. Agency Agreement | 10 |
| B. Security | 10 |
| C. Hardware | 10 |
| SECTION 2.02 OPERATIONS ANALYSIS | 10 |
| A. Paperwork..... | 10 |
| B. ClientTrack Customization | 10 |
| SECTION 2.03 EXECUTION | 11 |
| A. Training | 11 |
| B. “Going Live” | 11 |
| SECTION III. TRAINING | 12 |
| SECTION 3.01 INITIAL TRAINING..... | 12 |
| A. Certification | 12 |
| B. Scheduling | 12 |
| C. Training Curriculum | 12 |
| SECTION 3.02 ONGOING TRAINING | 13 |
| SECTION IV. ACCESS AND SECURITY..... | 14 |
| SECTION 4.01 PHYSICAL ACCESS | 14 |
| SECTION 4.02 INTERNET ACCESS | 14 |
| SECTION 4.03 SHELTERNET AND CLIENTTRACK ACCESS..... | 14 |
| A. Location | 14 |
| B. Personal Key Identifier (PKI) Security Certificate | 14 |
| C. User Levels | 15 |
| SECTION 4.04 CLIENTTRACK USER NAMES AND PASSWORDS | 15 |
| A. Security | 15 |
| B. User Names..... | 16 |
| C. Passwords | 16 |
| D. Logging In and Logging Out | 16 |
| SECTION 4.05 VIRUS PROTECTION | 16 |
| SECTION 4.06 ACCESS AUDITING | 16 |
| SECTION 4.07 SECURITY BREACHES | 17 |
| A. Reporting and Investigation..... | 17 |

| | |
|--|-----------|
| B. Resolution..... | 17 |
| C. Client Notification..... | 17 |
| SECTION V. TECHNICAL SUPPORT AND SYSTEM AVAILABILITY | 18 |
| SECTION 5.01 TECHNICAL SUPPORT..... | 18 |
| A. Reporting Tree..... | 18 |
| B. Implementation Phase..... | 19 |
| C. Procedures for Service Request..... | 19 |
| SECTION 5.02 TROUBLESHOOTING PROCEDURE..... | 19 |
| A. Computer or Terminal is not operational..... | 19 |
| B. Internet is not operational..... | 19 |
| C. ClientTrack is not responding..... | 19 |
| SECTION 5.03 SYSTEM AVAILABILITY..... | 20 |
| A. Uptime..... | 20 |
| B. Downtime..... | 20 |
| SECTION 5.04 DOWNTIME PROCEDURES..... | 20 |
| A. Planned Interruptions of Service..... | 20 |
| B. Unplanned Interruptions of Service..... | 20 |
| SECTION 5.05 BACKUPS..... | 20 |
| SECTION 5.06 CONTINGENCY PLAN..... | 21 |
| A. Systems Administrator..... | 21 |
| B. ClientTrack..... | 21 |
| SECTION VI. DATA STANDARDS..... | 22 |
| SECTION 6.01 DATA COLLECTION..... | 22 |
| A. Client Interaction..... | 22 |
| B. Privacy and Confidentiality..... | 22 |
| C. Client Consent to Participate in ShelterNet..... | 22 |
| D. Data Integrity..... | 22 |
| E. Methods of ensuring data integrity..... | 23 |
| SECTION 6.02 DATA RELEASE PROTOCOLS AND REPORTING..... | 23 |
| A. Data Ownership..... | 23 |
| B. Systems Administrator..... | 23 |
| C. Unduplication Procedure..... | 23 |
| SECTION 6.03 RELEASE OF DATA PRINCIPALS (PARTICIPATING AGENCY)..... | 23 |
| SECTION 6.04 DATA SHARING..... | 24 |
| SECTION 6.05 RIGHT TO DENY ACCESS..... | 24 |
| A. Aggregate data..... | 24 |
| B. Client-Identified data..... | 24 |
| SECTION 6.06 LEGACY DATA..... | 24 |
| SECTION 6.07 DATA DISPOSAL..... | 25 |
| SECTION 6.08 AGENCY POLICIES RESTRICTING ACCESS TO DATA..... | 25 |
| SECTION 6.09 DATA HARD COPIES..... | 25 |
| A. Printed Data..... | 25 |
| B. Media Containing Data..... | 25 |
| SECTION 6.10 HUD STANDARDS..... | 25 |
| SECTION VII. REVISION HISTORY..... | 26 |
| A. Version 0.1..... | 26 |
| B. Version 0.2..... | 26 |
| C. Version 0.3..... | 26 |
| D. Version 0.4..... | 26 |
| E. Version 1.0..... | 26 |
| APPENDIX A. GLOSSARY..... | 27 |

Introduction And Goals

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Introduction

ShelterNet is the Homeless Management Information System (HMIS) for Broome County. HMIS is a federal Department of Housing and Urban Development (HUD)-funded initiative whose purpose is to collect accurate statistical data on the consumption of services for the homeless. All organizations that receive McKinney-Vento homeless services funding are required to participate in the HMIS initiative.

The Broome County Homeless Coalition, charged with initiating HMIS, is a collaborative body comprised of stakeholders in the field of homeless service provision. The data backbone of the ShelterNet project is ClientTrack – an internet-based, centralized case management database product owned by Data Systems International (DSI). ClientTrack allows authorized participating agency personnel to collect client data and maintain client charts electronically.

Fairview Recovery Services, Inc. (FRS) is acting as the lead agency for the Broome County Homeless Coalition in the local implementation of the HMIS. Current participating agencies, in addition to FRS, are the YWCA of Binghamton, the Broome County YMCA, the Volunteers of America (VOA), the Teen Transitional Living Program (TTLP) of Broome County Catholic Charities, and may include other agencies in the future which provide services to the homeless in the Broome County area.

FRS has executed a 3-year contract with HUD to provide funding for ShelterNet, and has contracted with DSI to provide ClientTrack. Additionally, each participating agency and each authorized user has signed a contract with FRS referencing this Policies and Procedures Manual and their agreement to the terms outlined herein. Agency Agreements and User Agreements are on file at FRS and each respective participating agency.

ShelterNet is maintaining an official website which is available at <http://www.shelter-net.org>. Newsletters, press releases, event announcements, contact information, pictures, and links are available via the site, as well as a wealth of additional information.

Goals

In accordance with HUD's requirements, the purpose of ShelterNet is to improve the quality and integration of services to the homeless in Broome County, and to provide a central repository of data to aid in policy-making at the local, state and federal levels. The Broome County project has targeted the following goals over the next 3 years:

- Provide homeless service agencies technology for electronic record-keeping
- Improve the quality of services to the homeless
- Expedite homeless client intake procedures
- Improve case management to the homeless

- Track homeless client outcomes
- Provide aggregate information on homelessness for funders, specifically HUD

HUD's data standards are listed in the Homeless Management Information Systems (HMIS) Data and Technical Standards Final Notice (69 FR 45888). The report is available online at <http://www.hud.gov/offices/cpd/homeless/rulesandregs/fr4848-n-02.pdf> or by request from the ShelterNet Administration Team.

Section I. Contractual Requirements and Roles

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Section 1.01 Agency Roles and Responsibilities

A. All roles and responsibilities are in effect for the duration of the HUD agreement, that is, from October 2004 through September 2007

B. Lead Agency – Fairview Recovery Services, Inc. (FRS)

- 1) Responsible for all duties as outlined in each respective Agency Agreement
- 2) Provide the ShelterNet Administration Team and any associated staff, as necessary.
Examples of possible positions include:
 - a) Project Administrator
 - b) Systems Administrator
 - c) Outside Expert Advisors
 - d) Project Assistant(s)
 - e) Other positions as deemed necessary
- 3) Facilitate the ShelterNet Steering Committee which consists of:
 - a) The ShelterNet Administration Team
 - b) At least one representative from each participating agency
 - c) Non-voting invitee representatives from potential participating agencies
- 4) Manage the implementation
- 5) Coordinate with DSI in the maintenance of the ClientTrack software following implementation
- 6) Assure the fulfillment of the requirements of the HUD HMIS grant
- 7) Obtain cash-match funds
- 8) Carry out budgeting and allocation of all funds from the HUD and cash-match grants
- 9) Coordinate as much as is reasonably possible with participating agencies on the implementation and maintenance of the ShelterNet system
- 10) Procure and install, or arrange the installation of, hardware linking each participating agency to the internet, the ShelterNet system, and the ClientTrack software, if necessary
- 11) Provide initial training to staff at each participating agency
- 12) Provide technical support and troubleshooting to participating agencies
- 13) Maintain the Policies and Procedures Manual and give notification of any changes to the participating agencies
- 14) Administer the contingency plan in case of personnel emergency
- 15) Various responsibilities as detailed in the Exhibit A of each respective agency agreement, as specific budgeting and billing elements vary from agency to agency

C. Participating Agencies

- 1) Must sign an Agency Agreement with FRS before any customization, implementation, or training begins
- 2) Must submit a signed user agreement before obtaining access to ClientTrack (user name and password) for any agency staff
- 3) Must coordinate with the ShelterNet Administration Team to produce a Privacy Policy governing the staff's use and treatment of client information
- 4) Responsible for all duties as outlined in the respective Agency Agreement, the Privacy Policy, and this Policies and Procedures Manual
- 5) Responsible for ensuring that access to the ClientTrack system is monitored and regulated on a need-to-know basis
- 6) Responsible for determining the homeless and chronic homeless status of each client (See Appendix A for definitions)
- 7) Responsible for collecting at least the minimum 14 data elements as outlined in the HMIS Data Standards, and more if applicable
 - a) Name
 - b) Social Security Number
 - c) Date of Birth
 - d) Ethnicity and Race
 - e) Gender
 - f) Veteran Status
 - g) Disabling Condition
 - h) Residence Prior to Program Entry
 - i) Zip Code of Last Permanent Address
 - j) Program Entry Date
 - k) Program Exit Date
 - l) Unique Person Identification Number
 - m) Program Identification Number
 - n) Household Identification Number
- 8) Must maintain a high-speed internet connection with which to connect to the ShelterNet system (this may or may not be provided by FRS; see respective Agency Agreement for details)
- 9) Must designate a staff member to be the Participating Agency ShelterNet Representative
- 10) Responsible for leading their respective implementation with regard to:
 - a) prioritizing pieces of the implementation
 - b) making decisions regarding which staff will be trained
 - c) evaluating existing paperwork, policies, and procedures and making changes as necessary to comply with the requirements of the HMIS guidelines and ShelterNet Administration Team recommendations
- 11) Responsible for monitoring and reporting system issues to the ShelterNet Administration Team for proper correction and reconciliation
- 12) Responsible for training staff on the ShelterNet system subsequent to the initial training provided by FRS

- 13) Responsible for all hardware maintenance and replacement subsequent to the initial implementation which is provided by FRS
- 14) Required to allow System Administrator physical access to the ShelterNet hardware at all times
- 15) Required to coordinate with the ShelterNet Administration Team to carry out the policies and procedures outlined in this document

Section 1.02 Agency and User Agreements

A. Scope

- 1) All Agency and User agreements reference this Policies and Procedures Manual as the definitive source for standard operations within the ShelterNet system.
- 2) Whereas each agency agreement details specific terms between FRS and each respective participating agency, this Policies and Procedures Manual lays out the broad framework for the organization and operation of the ShelterNet project
- 3) Agency Agreements, User Agreements, Service Contracts, and this Manual serve together to provide the framework for operating ShelterNet

B. Requirements

- 1) In order for a participating agency to be granted access to the ShelterNet system, that agency will need to have a signed copy of the Agency Agreement on file with FRS
- 2) In order for any user to be granted a username and password, and thusly given access to the ShelterNet system, that user will need to have a signed copy of the User Agreement on file with FRS

Section 1.03 Personnel Roles and Responsibilities

A. ShelterNet Project Administrator

- 1) Holds ultimate decision-making authority over the ShelterNet Project
- 2) Works closely with the Systems Administrator to:
 - a) determine the budget
 - b) allocate resources
 - c) make organizational decisions
 - d) plan the implementation and maintenance of the system
- 3) Responsible for seeing that all grant-funding requirements are met and satisfied, including reporting

B. ShelterNet Systems Administrator

- 1) The Systems Administrator shall not be an employee of any agency participating in the ShelterNet Project
- 2) Responsible for the database design, creation, and realization
- 3) Responsible for monitoring the security of the ShelterNet system and the integrity of the data
- 4) Solely in charge of creating, modifying, deleting, and maintaining user names and passwords

- 5) Works in close conjunction with the Project Administrator to advise on all decisions concerning the project
- 6) Works with DSI to troubleshoot problems with the ClientTrack software, and implement upgrade releases
- 7) Responsible for creating reports and designing reporting mechanisms in conjunction with DSI

C. Participating Agency Executive Director or Chief Executive

- 1) Represents participating agency in collaboration and organization-level decision-making
- 2) Signs off on any contract dealing with the ShelterNet project
- 3) Responsible for allocating resources of participating agency, as necessary
- 4) Responsible for making operational decisions
- 5) Responsible for all activity associated with agency staff access and use of the ShelterNet system
- 6) Responsible for notifying the ShelterNet Administration Team of any changes in the status of the ShelterNet Representative
- 7) Responsible for establishing business practices and controls that meet the criteria for access to the ShelterNet system as detailed in this manual
- 8) Agrees to allow access to the ShelterNet system based only upon need: only for those staff, volunteers, or designated personnel who work directly with (or supervise staff who work directly with) clients or have data entry responsibilities
- 9) Oversees the implementation of data security policies and standards
- 10) Oversees the implementation of the Privacy Policy associated with ShelterNet
- 11) Monitors compliance and periodically reviews control decisions
- 12) Assumes responsibility for integrity and protection of client-level data entered into the ShelterNet system and will be held liable for any misuse or abuse by staff

D. Participating Agency ShelterNet Representative

- 1) Is designated by the participating agency's Executive Director
- 2) Serves as the main contact person between the ShelterNet project leadership and the participating agency
- 3) Submits user agreements to the Systems Administrator, keeping copies on file at the participating agency
- 4) Responsible for communicating to the Systems Administrator all changes and corrections in the agency's information as listed in the ShelterNet system
- 5) Responsible for communicating to the Systems Administrator all changes and corrections in the status of users, including:
 - a) Termination of employment
 - b) Extended leave of absence
 - c) Vacation
 - d) Promotion
 - e) Demotion
 - f) Transfer

E. Staff/User

- 1) Must have legitimate need to view and enter data into the ShelterNet system; will be given user names and passwords by the Systems Administrator
- 2) Must sign a user agreement and submit to Participating Agency ShelterNet Representative before gaining access to the system
- 3) Responsible for following the provisions of the User Agreement and this Policies and Procedures Manual
- 4) Responsible for entering the day-to-day information necessary to comply with the HMIS and participating agency guidelines
- 5) Must be aware of all data's sensitivity and take appropriate measures to prevent unauthorized disclosure
- 6) Responsible for protecting institutional information to which they have access and for reporting security violations
- 7) Accountable for their actions and for any actions undertaken with their usernames and passwords

F. Staff Trainer

- 1) Will be trained by the ShelterNet Administration Team
- 2) Responsible for training new staff/users how to operate the ShelterNet System subsequent to the initial training carried out by the ShelterNet Administration Team

Section II. Implementation

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Section 2.01 Planning

A. Agency Agreement

- 1) Participating agencies are required to meet with the ShelterNet Administration Team as often as is necessary to come to agreement over the terms of the agreement
- 2) No implementation will commence until an Agency Agreement has been drafted, finalized, and signed by FRS and the participating agency

B. Security

- 1) Each participating agency will undergo a security assessment
- 2) The Systems Administrator will evaluate and identify impending security issues
- 3) Satisfactory terms will be agreed upon to address identified security issues and these terms will be included in the Agency Agreement

C. Hardware

- 1) Participating agency will work with FRS to determine what hardware, if any, will be needed for the ShelterNet implementation
- 2) Details of hardware procurement and installation will vary from agency to agency based on need, and will be specified in Appendix A of the Agency Agreement

Section 2.02 Operations Analysis

A. Paperwork

- 1) A participating agency will provide the ShelterNet Administration Team with a copy of all paperwork used to carry out the functions of the case management within the agency
- 2) A member of the ShelterNet Administration Team will carry out an interview with relevant participating agency staff to determine how the paperwork is used
- 3) The ShelterNet Administration Team will create an overview diagram of the operating procedure and submit diagram to participating agency for correction and approval
- 4) Once approved, the diagram will serve as the official framework around which the Systems Administrator will customize the ClientTrack software for use by the participating agency

B. ClientTrack Customization

- 1) Systems Administrator will create, edit, and modify database to create digital forms in accordance with paperwork diagram, existing paperwork, agency regulatory requirements, and advisement of the participating agency ShelterNet Representative

- 2) Testing of database will be completed by the ShelterNet Administration Team in cooperation with participating agency staff
- 3) Feedback will be considered and database will be amended as determined necessary by the Systems Administrator
- 4) Customization up to the budgeted amount as specified in Exhibit A of the respective agency agreements will be performed at the discretion of the ShelterNet Administration Team

Section 2.03 Execution

A. Training

- 1) An assessment of individual user competency will be carried about by the ShelterNet Administration Team
- 2) Initial training will be provided as specified in the Training section of this Manual

B. “Going Live”

- 1) The ShelterNet Administration Team will be on site and/or on call during this period of time, as the participating agency first begins using the ShelterNet system
- 2) The actual length of this period of time will be determined by agreement between the participating agency and the ShelterNet Administration Team and will consider the following factors, among others:
 - a) Amount of work required to implement vendor-provided updates
 - b) Degree of similarity between original paperwork and database of participating agency
 - c) Need of participating agency staff for assistance
 - d) Availability of the ShelterNet Administration Team

Section III. Training

| | | |
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Section 3.01 Initial Training

A. Certification

- 1) No one will be granted a user name and password without undergoing training and certification by the ShelterNet Administration Team
- 2) When a lapse in usage of ClientTrack of more than 30 days occurs, the user may be required to undergo additional training before regaining access to the system.
- 3) Certification is granted by the ShelterNet Administration Team when they determine that a user has successfully completed all the necessary requirements to operate the ShelterNet system (See [Training Curriculum](#))
- 4) Notice of certification and recertification will be placed in staff file when applicable

B. Scheduling

- 1) Training is scheduled on an as-needed basis
- 2) The ShelterNet Administration Team will coordinate with each participating agency on training times and locations

C. Training Curriculum

- 1) General computer understanding and awareness
 - a) Software
 - b) Hardware
 - c) Operating Systems
 - d) Internet Connections
- 2) General computer operational skills
 - a) Using a mouse
 - b) Keyboard skills
 - c) Navigation of the internet
 - d) Filling in forms
 - e) Windows structure
- 3) General ClientTrack environment awareness
 - a) Window panes and functions
 - b) Navigation
 - c) Menu explanations
 - d) Button behaviors
 - e) Procedural explanations
 - f) Theoretical explanations for questions
 - g) Given answer methodologies and explanations

- 4) Agency-specific ClientTrack procedures, forms, and paperwork
 - a) Explanation of changes from original paperwork
 - b) Assistance in the transition from paper to digital
 - c) Procedure to follow for intakes, maintenance, and follow-up
- 5) Security issues awareness
 - a) Login and logout procedures
 - b) Password security
- 6) Legal and Contractual Review
 - a) Review of this Policies and Procedures Manual
 - b) Review of the User Agreement
 - c) Review of the Privacy Policy

Section 3.02 Ongoing Training

- 1) Ongoing training needs will be assessed as the project develops
- 2) This includes, but is not limited to:
 - a) Additional Security Training
 - b) User Level-Specific Training
 - c) Report Writing Training

Section IV. Access and Security

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Section 4.01 Physical Access

- 1) Participating agencies are required to coordinate with the ShelterNet Administration Team to ensure the physical security of all computers, terminals, and other modes of communication with the ShelterNet system. This could entail:
 - a) Locked offices in which to keep the equipment
 - b) Supervision over equipment if and when it is not in a locked, secure environment
 - c) Locks or restraint devices to impede the movement of equipment from the installation location
- 2) Participating Agencies are required to coordinate with the ShelterNet Administration Team to ensure adequate measures are taken for physical security
- 3) All those granted access to an area or to data are responsible for their actions
- 4) Those granting another person access to an area, are responsible for that person's activities

Section 4.02 Internet Access

- 1) It is the responsibility of each participating agency to monitor and regulate the use of the internet by their staff
- 2) Every agency is strongly encouraged to formulate a computer and internet usage policy and contract for their staffs (examples can be requested from the ShelterNet Administration Team)
- 3) The ShelterNet Administration Team is not responsible for regulating user access to the internet
- 4) Neither the ShelterNet Administration Team nor FRS is responsible for any damage that may occur to computers, terminals, or workstations due to abuse of the internet by any staff

Section 4.03 ShelterNet and ClientTrack Access

A. Location

- 1) The ClientTrack website will only allow access to locations whose IP addresses are permitted
- 2) The Systems Administrator is responsible for registering an IP address so that a location is granted access

B. Personal Key Identifier (PKI) Security Certificate

- 1) High level security certificates must be installed on each computer in order for a computer, terminal, or workstation to be granted access to the ClientTrack database
- 2) These certificates are purchased and monitored by the Systems Administrator

C. User Levels

- 1) User access level rights will be determined by the ShelterNet Representative and the Systems Administrator
- 2) Specific users' level determinations will be made on a user-by-user basis by the ShelterNet Representative
- 3) Levels:
 - a) Level I (Program Aide)
 - i) Has the ability to view agency-approved client records within a specific program
 - ii) Cannot create records
 - b) Level II (Staff/User)
 - i) Has all the abilities of Level I
 - ii) Can create client records
 - c) Level III (Agency program coordinators/directors)
 - i) Has all the abilities of Level II
 - ii) Has the ability to run reports
 - d) Level IV (Agency ED/Program)
 - i) Has all the abilities of Level III
 - ii) Has the ability of viewing all records within an agency
 - e) Level V (Systems Administrator)
 - i) Has all the abilities of Level IV
 - ii) Has access to all information of all agencies, programs, and users
 - iii) Has all of the abilities as listed in the [Systems Administrator](#) description listed above (Section I – 1.03 – B)

Section 4.04 ClientTrack User Names and Passwords

A. Security

- 1) No one can access the ClientTrack software without a user name and password created and assigned by the Systems Administrator
- 2) User names and passwords are not assigned until a user agreement has been signed and the user has been trained and certified
- 3) Each user name and password is issued and assigned to one person and one person only
- 4) At no time should a user share a user name or password with another person, regardless of that person's role or position
- 5) Failure to abide by these stipulations can compromise the security of the ShelterNet system and is grounds for removal from the system by the Systems Administrator

- 6) Systems Administrator reserves the right to deny any user access to the system for the following reasons:
 - a) Violation of any ShelterNet security policy as outlined in this Manual
 - b) Violation of User Agreement

B. User Names

- 1) User names are generally formatted *FirstInitialLastName*, but the Systems Administrator has final say in the format of any given user name
- 2) A user name will be terminated immediately upon notification from a ShelterNet Representative that a user is no longer employed
- 3) A user name will be temporarily disabled during periods where a user is to be absent for a period of 30 days, as reported by that user's ShelterNet Representative

C. Passwords

- 1) Will be generated at random by the Systems Administrator using a password generator
- 2) Will contain eight characters
- 3) Will be alphanumeric, case-sensitive, and contain special characters
- 4) Users will not be able to change their passwords
- 5) The Systems Administrator should be contacted if, at any time, the security of a user name and password becomes breached
- 6) User names are locked out automatically following two unsuccessful login attempts
- 7) Passwords will be changed periodically

D. Logging In and Logging Out

- 1) Users should never leave a workstation, computer, or terminal while they are logged in
- 2) Users should save their work and log out of the ShelterNet system if they leave their workstation, computer, or terminal, and log back in when they return
- 3) Failure to abide by these stipulations can compromise the security of the ShelterNet system and is grounds for removal from the system by the Systems Administrator

Section 4.05 Virus Protection

- 1) Each participating agency is responsible for obtaining and maintaining sufficient virus protection as determined under the advisement of the Systems Administrator
- 2) FRS and the ShelterNet Administration Team are not responsible for any damages that result from viruses, spyware, and malware

Section 4.06 Access Auditing

- 1) The Systems Administrator will monitor data integrity and access integrity
- 2) Will monitor access logs to ensure unauthorized access is not taking place

- 3) The Systems Administrator will regularly review all available network and security logs including, but not limited to:
 - a) Transactions log
 - b) Internet log
 - c) Log of web server errors
 - d) Firewall log tracking attempts at unauthorized access
 - e) HMIS logs

Section 4.07 Security Breaches

A. Reporting and Investigation

- 1) Users and staff are obligated to report any breaches or potential breaches of security to the Systems Administrator
- 2) All potential violations of any security protocol will be investigated
- 3) Any user found to be in violation of security protocols will be sanctioned according to the severity of the violation
- 4) Any agency that is found to have consistently and/or flagrantly violated security protocols may have their access privileges suspended or revoked

B. Resolution

- 1) The participating agency Executive Director and/or ShelterNet Representative will be consulted on all investigations by the ShelterNet Administration Team
- 2) Sanctions may include but are not limited to
 - a) a formal letter of reprimand
 - b) suspension of system privileges
 - c) revocation of system privileges
 - d) criminal prosecution

C. Client Notification

- 1) At the time of this document's approval, client notification requirements and procedures are still being debated on the legislative level
- 2) Any breaches of client security shall be dealt with on a case-by-case basis until a more conclusive determination is made on the legal boundaries and ramifications of the Breach Notification Laws, at which time, this section will be amended

Section V. Technical Support and System Availability

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| Title: Technical Support and System Availability | | |

Section 5.01 Technical Support

A. Reporting Tree

- 1) The operational sequence of reporting is as follows:
 - a) User/Staff Member
 - b) Super User
 - c) Participating Agency ShelterNet Representative
 - d) Systems Administrator
 - e) DSI
- 2) All staff are to report only to those directly ahead of them on reporting tree, such that:
 - a) No staff member should contact DSI for technical support
 - b) Regular Users/Staff Members should not contact the Systems Administrator directly
 - c) Only ShelterNet Representatives or designated Super Users should contact the Systems Administrator
 - d) Regular Users/Staff Members should report all concerns to the on-duty Super User or the ShelterNet Representative
- 3) The ShelterNet Representative or Super User will address all problems as they are able to and determine if a concern is beyond their capacity to remedy
- 4) If a concern is beyond their capacity to remedy, then they will contact the Systems Administrator for additional assistance
- 5) All concerns and attempted remedies and their results should be reported to the Systems Administrator as soon as is practical, such that major concerns are reported as they occur and minor concerns are reported as part of the routine communication process (Put another way, emergencies should be reported immediately, regardless of the time, and small problems should be reported during normal daytime business hours)
- 6) Major concerns:
 - a) Consistent errors that defy current understanding of the normal operation of the system
 - b) A breach of security
 - c) The dismissal or departure of a user

- 7) Minor concerns:
 - a) Internet connectivity is down
 - b) Inability of staff to use a particular terminal, computer, or workstation when another means of connecting to the ClientTrack database is available
 - c) ShelterNet connectivity is down and procedures for using paper forms are in place

B. Implementation Phase

- 1) The ShelterNet Administration Team will be available during operating business hours of the participating agency
- 2) Participating agency ShelterNet Representatives are allowed to contact designated members of the ShelterNet Administration Team with concerns

C. Procedures for Service Request

- 1) Super User or ShelterNet Representative is made aware of a concern, either by report from staff or from experience
- 2) Super User or ShelterNet Representative will call or email Systems Administrator and explain the circumstances of the concern
- 3) If an official request for service is required, Super User or ShelterNet Representative will go to the ShelterNet website and fill out an online Official Request form
- 4) Systems Administrator will coordinate with the staff to address the concern until it has been remedied
- 5) Systems Administrator will contact DSI as needed for further assistance in clearing up any concerns

Section 5.02 Troubleshooting Procedure

A. Computer or Terminal is not operational

- 1) Make sure all cords are tightly plugged in and power outlets are working correctly
- 2) Reboot computer, if possible

B. Internet is not operational

- 1) Reboot the network switch, hub, or router as applicable
- 2) Reboot computer or terminal
- 3) Inquire with Internet Service Provider to inquire about possibility of distribution system issues

C. ClientTrack is not responding

- 1) Make sure internet service is responding
- 2) Verify the address is https://www.clienttrack.net/participating_agency_name_here
- 3) Double check that the address begins https://. There MUST be an 's' after 'http'

Section 5.03 System Availability

A. Uptime

- 1) DSI guarantees that ClientTrack.net is available 24 hours a day, 365 days a year, except during Downtime (see below)
- 2) Any regularly scheduled maintenance will take place between 2:00 AM and 4:00 AM Mountain Standard Time, Monday through Friday and may render the system unusable

B. Downtime

- 1) A Unit of Downtime is defined by the DSI agreement as “one period of at least 15 minutes during which the Software is unavailable because of problems with or the unscheduled maintenance of our hardware or system software.”
- 2) Downtime does not include:
 - a) problems caused by factors outside of DSI’s reasonable control
 - b) problems resulting from any actions or inactions by FRS, participating agency, or any third party
 - c) problems resulting from FRS’ equipment, participating agency’s equipment, and/or third party’s equipment not within DSI’s sole control
 - d) network unavailability during scheduled maintenance of our network and/or servers
- 3) Downtime is guaranteed by DSI not to exceed four (4) Units during any calendar month

Section 5.04 Downtime Procedures

A. Planned Interruptions of Service

- 1) Participating agencies will be notified of planned interruption a minimum of 24 hours in advance, or as soon as possible
- 2) Participating agencies will be given specific instructions to accommodate interruption
- 3) Participating agencies will be informed when service has been restored

B. Unplanned Interruptions of Service

- 1) Participating agencies are to have procedures in place in case of unplanned interruption of service
- 2) Paper forms will be on hand and are to be used on a contingency basis only
- 3) Participating agencies are to enter data into the ShelterNet system within 24 hours of the restoration of the system

Section 5.05 Backups

- 1) Backups are carried out by DSI
- 2) The Systems Administrator works with DSI to implement backup restoration when necessary

Section 5.06 Contingency Plan

A. Systems Administrator

- 1) FRS has created a contingency plan to be carried out in case the Systems Administrator becomes unavailable
- 2) DSI will be contacted to carry out the functions of the Systems Administrator
- 3) Further details are listed in the ShelterNet Contingency Plan, and are available from FRS

B. ClientTrack

- 1) In the event that ClientTrack goes out of business or is bought out by another company, FRS has the right to claim a copy of the software
- 2) FRS will have the ability to run the software and maintain operation of the ShelterNet System
- 3) Further details are listed in the ShelterNet Contingency Plan, and are available from FRS

Section VI. Data Standards

| | | |
|--------------------------------|------------------------|--------------------------|
| Policies and Procedures Manual | Revision: 0.3 | Prepared by: Justin Hoch |
| Approval Date: 3/7/06 | Revision Date: 1/25/06 | Revised by: SAT |
| Title: Data Standards | | |

Section 6.01 Data Collection

A. Client Interaction

- 1) All client information is to be treated with the utmost confidentiality in accordance with the User Agreement
- 2) Participating agencies are required to develop oral and/or written explanations that will be given to clients to inform them about the ShelterNet system

B. Privacy and Confidentiality

- 1) Participating Agencies will coordinate with the ShelterNet Administration Team on the completion of an agency-specific Privacy Policy
- 2) Users are required to adhere to the same strict standards of confidentiality and information security as are required for paper systems, as is mandated by federal law, state law, and relevant governing bodies (i.e. HUD, OASAS, HIPPA, etc.)
- 3) Each participating agency is responsible for determining which standards are applicable to them, keeping in mind that the strictest requirement is to be followed
- 4) Participating agencies are required to post a copy of the Privacy Policy Posting at every intake location
- 5) Participating agencies are required to have copies of the Privacy Policy available on request and on their website

C. Client Consent to Participate in ShelterNet

- 1) Users will follow the Privacy Policy established by their respective participating agency
- 2) HUD requirements state that consent can be inferred simply by the client's attendance and request for service
- 3) HUD requirements state that other, more strict regulations take precedence (i.e. HIPPA, OASAS, etc.)
- 4) Clients can refuse to allow identifying information to be entered into in the ShelterNet project, unless the information being collected is mandatory for admittance to a particular program

D. Data Integrity

- 1) Data integrity is the maintenance and control over uniformity in data collection, recording, and handling within and between agencies so that data is uniform and "clean"
- 2) Data integrity controls must encompass both manual and electronic processing
- 3) Errors, duplications, omissions and intentional alterations should be discovered and investigated
- 4) Many data integrity controls will reside within the application or system

- 5) The System Administrator is responsible for monitoring data integrity and will address agency specific issues with data integrity

E. Methods of ensuring data integrity

- 1) The system will enforce referential integrity rules and restraints
- 2) Only authorized personnel are permitted access to authorized records
- 3) Only the Systems Administrator has access to the back-end of the system
- 4) The Systems Administrator will not change data in the back-end of the system, unless:
 - a) Such action is necessary for the process of unduplication or removal of redundant data
 - b) Data is corrupted
 - c) Data is erroneous

Section 6.02 Data Release Protocols and Reporting

A. Data Ownership

- 1) Each participating agency owns their respective data, that is, data entered by one of their employees
- 2) No participating agency has the ability to see any data of any other participating agency

B. Systems Administrator

- 1) Has the exclusive right to access data from any agency for the purpose of unduplication and reporting aggregate statistics from the ShelterNet system and no other individual, including any FRS personnel, will have access to the entire database
- 2) The Systems Administrator has signed a strict confidentiality agreement and is under extremely stringent guidelines concerning data security, confidentiality, and privacy
- 3) A copy of the System Administrator's confidentiality agreement is available on request

C. Unduplication Procedure

- 1) The Systems Administrator will carry out unduplication procedures, referencing six unique identifiers as collected in the ShelterNet System
- 2) Participating agencies can inquire to the Systems Administrator for more specific details regarding the unduplication procedure

Section 6.03 Release of data principals (Participating Agency)

- 1) Only de-identified aggregate data will be released
- 2) Program specific information will not be released without the written consent of the participating agency Executive Director
- 3) There will be full access to de-identified, aggregate data for all participating agencies
- 4) Aggregate data will be available in the form of an aggregate report or as a raw data set

- 5) Aggregate data may be made directly available to the public in the future
- 6) Parameters of the aggregate data, that is, where the data comes from, what it includes and what it does not include will be presented with each report
- 7) Any request for client-identified data from any person, agency, or organization other than the owner will be reviewed by the ShelterNet Administration Team with the ultimate decision controlled by the participating agency or agencies from which the data would be drawn

Section 6.04 Data Sharing

- 1) No data will be shared between agencies at this time
- 2) The issue will be addressed in the future, presumably following the initial implementation and a period of time for participating agencies to become comfortable with the system

Section 6.05 Right to deny access

A. Aggregate data

- 1) The Systems Administrator has the right to deny requests for data except those guaranteed under the agency agreements
- 2) Contractual responsibilities are stated in the Systems Administrator Agreement with FRS
- 3) Restrictions are placed on the release of data in the HUD-released data standards documentation

B. Client-Identified data

- 1) Any and all requests for client-identified data, without client's explicit consent and release as indicated in a signed document, must be submitted to the Systems Administrator, including court-ordered subpoenas
- 2) Under normal circumstances, the Systems Administrator will not release client-identified data
- 3) Only under the following circumstances will the Systems Administrator release client-identified data:
 - a) Where a participating agency has consented in writing to such disclosure
 - b) To the extent required by law
 - c) By the request or requirement of any judicial, legislative, administrative, or other governmental body
- 4) Before any data has been released:
 - a) The Systems Administrator will first have given prompt notice to the participating agency of any possible or prospective order (or proceeding pursuant to which any order may result)
 - b) The participating agency will have been afforded a reasonable opportunity to prevent or limit any disclosure

Section 6.06 Legacy Data

- 1) No participating agency has the right or ability to enter legacy (i.e. existing, pre-ShelterNet) data

- 2) All data entered into the system must be taken in after the “go-live” date of that particular participating agency

Section 6.07 Data Disposal

- 1) Data Disposal procedures will be determined by requirements set forth by participating agency’s governing bodies
- 2) Disposal of electronic data will be carried about by the Systems Administrator with the assistance of DSI

Section 6.08 Agency Policies Restricting Access to Data

- 1) The Participating Agencies must establish internal access to data protocols
 - a) These policies should include who has access, for what purpose, and how they can transmit this information
 - b) Issues to be addressed include storage, transmission and disposal of these data
- 2) Identify which staff has access to the client paper records and for what purpose
- 3) Staff should only have access to records of clients which they directly work with or for data entry purposes
- 4) Identify how and where client paper records are stored
- 5) Develop policy regarding length of storage and disposal procedure of paper records
- 6) Develop policy on disclosure of information contained in client paper records

Section 6.09 Data Hard Copies

A. Printed Data

- 1) Printed versions of data held in the ShelterNet System should not be removed from the participating agency’s premises, unless explicitly consented to and released by the client
- 2) Printed versions of confidential data should not be copied or left unattended and open to unauthorized access
- 3) Printed versions of data should be destroyed once their use has been exhausted

B. Media Containing Data

- 1) No data should be stored or transported on external media such as floppy disks, USB flash drives, or CDs
- 2) Hardware containing data should not be removed from the premises of the participating agency

Section 6.10 HUD Standards

- 1) The ShelterNet Administration Team will monitor releases by HUD for changes in the operational or data standards
- 2) The ShelterNet Administration Team will coordinate with participating agencies to maintain compliance with the changing standards

Section VII. Revision History

A. Version 0.1

- 1) Initial draft
- 2) Written by Justin Hoch
- 3) June 2005 – December 2005
- 4) References:
 - a) Jacksonville Information Network (JIN) Standard Operating Procedures
 - b) Ohio Balance of State HMIS (OBOSHMIS) Policies and Procedures Manual
 - c) Connection, Service and Partnership through Technology (CSPTech) Project Policies and Procedures
 - d) Spokane HMIS Policies and Procedures Manual
 - e) Wisconsin ServicePoint Standard Operating Procedures
 - f) Chicago Enterprise Case Management HMIS (ECM-HMIS) Standard Operating Procedures
 - g) Lake County HMIS Policies and Procedures Manual
 - h) National HMIS Conference: Developing and Maintaining Policies and Procedures Handouts #1 & #2

B. Version 0.2

- 1) First edit
- 2) December 2005
- 3) Worked on by Justin Hoch, Jim Hulse, and Michele Napolitano

C. Version 0.3

- 1) Mary Diegert's recommendations incorporated into draft
- 2) December 2005 and January - February 2006
- 3) Worked on by Justin Hoch, Jim Hulse, Michele Napolitano, and Mary Diegert

D. Version 0.4

- 1) Participating Agencies first look
- 2) February 2006
- 3) Worked on by Justin Hoch, Michele Napolitano, Jim Hulse, and representatives of the Participating Agencies

E. Version 1.0

- 1) Approved and finalized Manual
- 2) March 2006

Appendix A. Glossary

1) Homeless

- a) An individual who lacks a fixed, regular, and adequate nighttime residence;
- b) An individual whose primary nighttime residence is:
 - i) a supervised, publicly- or privately-operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill)
 - ii) an institution that provides a temporary residence for individuals intended to be institutionalized
 - iii) a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.
- c) Those who are imprisoned or otherwise detained pursuant to an Act of the Congress or a State law are NOT considered homeless.
- d) Definition taken from {42 USC Sec. 11302} or {Title 42, Chapter 119, Subchapter 1, Section 11302}

2) Chronic Homelessness

- a) The condition of homelessness where an unaccompanied individual:
 - i) Has experienced continuous homelessness for a year or more,
 - or**
 - ii) Has experienced at least four episodes of homelessness during the previous three years;
 - and**
 - iii) Has a disabling condition
- b) Definition taken from the Notice of Funding Availability for the Collaborative Initiative to Help End Chronic Homelessness/Federal Register, Vol. 68, No. 17/Monday, January 27, 2003, 4019. This definition is shared by the U.S. Department of Housing and Urban Development, the U.S. Department of Health and Human Services, the U.S. Interagency Council on Homelessness, and the U.S. Department of Veterans Affairs

3) Disabling Condition

- a) A disability as defined in the Section 223 of the SS Act
- b) A physical, mental, or emotional impairment which as
 - i) Expected to be of long-continued and definite duration
 - ii) Substantially impedes an individual's ability to live independently and
 - iii) Of such a nature that such ability could be improved by more suitable housing conditions
- c) A developmental disability as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act
- d) The disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agency for aids
- e) A diagnosable substance abuse disorder