NY-508 HMIS Data Quality Plan

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Introduction

What is a Data Quality Plan?

A Data Quality Plan (DQP) is a comprehensive framework that outlines the guidelines and expectations for data quality within the Homeless Management Information System (HMIS), run by the HMIS Lead, the Homeless Alliance of Western New York (HAWNY). It describes benchmarks for data completeness, accuracy, and timeliness which have been established locally or determined by the Department of Housing and Urban Development (HUD). It also defines the roles and responsibilities of all parties involved in data management. This includes HAWNY, individual organizations, and providers. The data quality plan exists to facilitate best practices, ensure consistency, and promote high data quality.

Why is a Data Quality Plan Necessary?

A data quality plan is crucial because it facilitates better data quality, which is essential for making informed decisions about funding allocation and assessing project performance. Any information in HMIS must be as complete and accurate as possible. This allows for the creation of a realistic picture of homelessness services that can be used to improve the quality and success of those services. The data quality for all HMIS participating projects in the NY-508 region (WNY) is assessed both at the project level and system wide, therefore community success is reliant on the best efforts of all participants working together. Poor data quality can lead to misrepresentation, where the data fails to reliably reflect reality. This can result in service gaps, inefficient use of resources, and funding reduction. By implementing a Data Quality Plan, a Continuum of Care (CoC) can operate based on an accurate representation of the community, leading to more effective and helpful services.

How is a Data Quality Plan Used?

The Data Quality Plan serves as a tool and resource for guidance on policy and best practices. It clearly defines roles and responsibilities of all individuals and agencies that utilize HMIS in order to establish an understanding of the actions required to fulfill their obligation of advancing data quality practices. By adhering to the guidelines and expectations outlined in the plan, agencies and individuals can ensure their data is best suited to support the improvement of homeless services.

HUD Data Standards

The HMIS Data Standards, published and updated by the U.S. Department of Housing and Urban Development (HUD), provides a comprehensive framework for data collection in HMIS. These standards have been established to ensure data is collected in a way that is consistent, accurate, and compliant. This standardization facilitates reliable reporting that is able to provide insight on how different populations flow through the system and how the system is performing.

Each data element is listed along with the rationale behind its collection, instruction on what it is and how best to collect it, the funder it is required by, the project types it applies to, and at what point in the process it should be collected.

As the HMIS Lead, HAWNY is responsible for implementing and administering an HMIS that complies with these standards. HAWNY ensures that our HMIS prompts users with appropriate data collection fields based on project and funder requirements. The project and individual users are responsible for collecting the data in an accurate, complete, and timely manner in accordance with these standards.

Below is a brief description of the main types of data elements; Universal Data Elements (UDEs), Program Specific Data Elements (PSDEs), Local Data Elements, and Organization Specific Elements.

Universal Data Elements (UDEs)

Universal Data Elements (UDEs) are specific pieces of data that are required to be collected for all projects.

- Name
- Social Security Number
- Date of Birth
- Race and Ethnicity
- Project Exit Date
- Destination
- Relationship to Head of Household
- Enrollment CoC

- Veteran Status
- Disabling Condition
- Project Start Date
- Housing Move in Date
- Prior Living Situation

Program Specific Data Elements (PSDEs)

Program Specific Data Elements (PSDEs) are required for some projects, but not all. They may be required due to regulations from federally funded programs or different funding sources. When required, PSDEs will appear within the various assessments in HMIS (e.g., Entry, Exit, Interim Review, etc.). They are commonly used for reporting purposes, as well as to monitor service efficacy, track client progress, and assess client needs.

Below are the Common PSDEs which are required for most project types and funding sources. There are additional PSDEs that apply to only a few project types or funding sources. These additional PSDEs are primarily specific to Housing Opportunities for People with AIDS (HOPWA), Projects for Assistance in Transition from Homelessness (PATH), Runaway and Homeless Youth (RHY), Youth Homelessness Demonstration Project (YHDP), and Veterans Affairs (VA) funded projects.

- Income and Sources
- Non-Cash Benefits
- Health Insurance
- Disability Type
- Domestic Violence History
- Current Living Situation
- Date of Engagement
- Coordinated Entry Assessment
- Coordinated Entry Event
- Sex

Local Data Elements

Our CoC has additional requirements that are used in a similar way as the PSDEs. They are used to assess client needs and for reporting purposes. See this document _____ for more information on the Coordinated Entry (CE) questions.

- Zip Code of Last Permanent Address
- Primary Reason for Homelessness
- Gender

- Coordinated Entry (CE) questions

Organization Specific Data Elements

Organization Specific Data Elements are questions that organizations or projects can elect to include, but are not required by HUD or any funding source. Individual organizations are responsible for maintaining the accuracy and completeness of the responses to these questions. These questions and their responses will *not* be monitored by HAWNY.

Main Data Quality Measures

Accuracy

Accurate client data is crucial to the utility of HMIS. It is pivotal that the data in HMIS reflects real-world circumstances and situations to ensure it can effectively inform decision making, funding allocation, and identify service gaps - all of which are critical parts of ending homelessness in our community. To support data accuracy, adherence to the data standards, collection procedures, and best practices should be enforced at every stage of data collection and management.

Timeliness

Data entry for all projects must be completed within three days of data collection. Weekends and holidays *do* count towards the three days. Prompt data entry is crucial for Coordinated Entry (CE) and client progression of services. It also helps reduce the likelihood of human error, which increases as time passes between data collection and system entry.

Utilization

Utilization rates can be indicators of project performance, but they can also serve as warning signs for data quality issues. For example, an overly low rate could indicate that a project is potentially not entering clients, or an overly high rate could indicate that a project is potentially not exiting clients. All projects within HMIS should aim to have a utilization rate between 90% and 100%.

Completeness

The completeness of the data within HMIS is integral in that it helps avoid duplicate clients (the client being counted more than once in the system), can illuminate trends of individuals entering and exiting the system, and allows for more accurate evaluation of the effectiveness of services. The more complete the data, the more precise and actionable the reporting and analysis will be, ultimately improving the system's ability to serve its participants.

Assessing Data Completeness by Running an APR			
Section of the APR	**Data Element**	**ES and SO Data Issues**	**PSH, RRH, TH, and HP Data Issues**
6a - Personally Identifiable Information (PII)	Name, Social Security Number, Date of Birth, and Race and Ethnicity.	Less than 5% Overall Score	Less than 5% Overall Score
6b - Universal Data Elements (UDEs)	Project Start Date, Relationship to Head of Household, Veteran Status, and Enrollment CoC.	Less than 5% for each element	Less than 5% for each element
	Disabling Condition.	Less than 10%	Less than 5%
6c - Destination	Destination.	Less than 25%	Less than 5% for each element
6c - Income and Sources	Income and Sources at Start, Income and Sources at Annual Assessment, and Income and Sources at Exit.	Less than 10%	Less than 5%
6d - Chronic Homelessness	Refer to the row for your project type:	Less than 10% records unable to calculate	Less than 5% records unable to calculate

	ES and SO: "ES-EE, ES-NbN, SH, Street Outreach" TH: "TH" PSH and RRH: "PH(all)"		

Data Collection and Accuracy

Accuracy In Practice

As explained above, every effort should be made to collect and record accurate client data. Organizations must implement procedures that promote factual, consistent, and error-free data collection and entry. To support this, HAWNY provides a range of standardized documents and forms on our website that projects can use to facilitate accuracy and compliance. The following guidelines are intended to help organizations strengthen their data collection practices and ensure the accuracy of the information recorded.

Client Intake and Exit Standards

Projects that use paper intake and exit forms must ensure that these documents properly align with the best practices outlined in the Data Standards, DQP, and HMIS Project Workflows which can be found in the Knowledge Base on the HAWNY website. Intake/exit form templates that are created by HAWNY can also be found on the website.

Intake

Projects should have a clear intake process that includes at least the following:

- Confirmation of the correct spelling of the client's first and last name, SSN, as well as verification of their date of birth by requesting an official ID.
- A review of project requirements, grievance policies, HMIS, Release of Information (ROI), and any project-specific rules and regulations.
- Clarification for both clients and staff regarding expectations and services.

- A procedure in place for data collection that gathers only necessary information and minimizes retraumatization (especially if not utilizing HAWNY's templates).

Exit

Projects should have a clear exit process that includes at least the following:

- A procedure that guides clients and staff in discharge planning while ensuring exit destinations are collected and communicated for data entry.
- Detailed information about the "Destination" field and responses can be found in the HUD Data Standards Manual. In brief, the exit destination should reflect where the client will stay immediately following their exit of the project. If a response is input and project staff later receive corrected information on where the client went immediately after exiting, the exit destination response can be updated.

Change in Client Information

HMIS data must be updated when the organization becomes aware of a change in client information. Updates should occur in an Interim Review if the client is still actively enrolled, in an Annual Assessment when a client reaches one year (365 days) of continuous project participation, or in the Exit Assessment when a client exits a project. Annual Assessments are required to be completed for every client each year they spend enrolled in a project. Projects have a window of 30 days before and 30 days after the client's entry date to complete their Annual Assessment. Contact the HMIS Team if a client's name or Social Security number needs to be edited.

HMIS Training Through HAWNY

All prospective HMIS users are required to complete HMIS training with the Training Coordinator at HAWNY before receiving access to HMIS. The training process ensures that all users are aware of best practices and expectations, allowing for consistency across organizations as well as accurate data and reporting.

The training process includes the following steps:

1. Self paced courses assigned by the Training Coordinator in our Learning Management System (LMS) with certificates of completion

2. Signing the HMIS User Agreement
3. Assignment(s) and one-on-one review with the Training Coordinator in the HMIS training website
4. Creation of username and password for access to the HMIS live website

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Privacy and Security

Following strict privacy and security measures is a requirement of all HMIS users. These rules are in place to protect the privacy of all clients. The following regulations serve as a reminder of common potential infractions. To review the comprehensive privacy and security rules and guidelines, please see the HMIS Privacy and Security Standards document.

- Never share your HMIS password or account with anyone, even if they are part of your organization
- Do not send personally identifiable information (PII) over unsecured email or save in an unsecured location
- Only access HMIS on a secure network and computer
- Protect access to paper forms or any physical documentation that may contain client information by storing it in a secure location such as a locked drawer

Client Consent and Data Sharing

Proper documentation of client consent is an essential component of HMIS and data collection. This section outlines important documents and procedures used to ensure that client data is collected, used, and shared in accordance with federal standards, privacy regulations, and ethical practices. For more detailed information on client consent and data sharing in HMIS, please see the HMIS Privacy and Security Standards document.

HMIS Consumer Privacy Notice

The HMIS Consumer Privacy Notice is a document that discloses agency participation in HMIS. It describes why data is collected and how it may be used or shared to facilitate services as well as specific rights clients possess regarding provision of their personal information.

The purpose of this notice is to provide transparency so that clients can make informed decisions about the data they share. All HMIS-participating agencies are required to display this notice prominently in areas where client

intake occurs so it can easily be accessed by clients. The most recent version of the notice is available on the HAWNY website.

HMIS Acknowledgement & Release of Information (ROI) Form

The HMIS Acknowledgement and Release of Information (ROI) form allows clients to choose whether or not their data can be shared across HMIS partner agencies. It is similar to the HMIS Consumer Privacy Notice in that it addresses client rights regarding their data and privacy, but the ROI specifically outlines consent for inter-agency data sharing and reviews specific questions or data that are usually asked or collected.

The ROI is meant to provide the client with an understanding of HMIS. This includes: what HMIS is and how it is used, what information is collected, who can access client information stored in HMIS, and a brief explanation of the benefit of choosing to allow inter-agency sharing. This document should allow the client to make an informed decision on their data sharing choice.

- A “yes” response allows the client’s data to be shared with other HMIS-participating agencies for coordination of services.
- A “no” response limits data visibility to only the project through which the client is receiving services. This means that only agency staff and system administrators (HAWNY staff) can view the client’s information.

Data that is part of the client record and is used to avoid duplicate record creation (Name, Date of Birth, Last Four Digits of SSN, Sex, and Veteran Status) is able to be seen by anyone with HMIS access unless the client has requested an anonymous profile or has selected “Client prefers not to answer” for any of these responses. These choices do not impact eligibility for services.

The HMIS Acknowledgement and Release of Information (ROI) form can be found on the HAWNY website.

Reporting

HUD

As the HMIS Lead for our CoC, HAWNY is responsible for working with the organizations within the CoC to ensure data is accurate and complete before

reporting to HUD. The following reports are completed for HUD on an annual basis.

- **Point in Time Count (PIT):** a count of sheltered and unsheltered individuals experiencing homelessness on a single night in January.
- **Housing Inventory Count (HIC):** a point-in-time inventory of projects that provide beds and units dedicated to serve people experiencing homelessness. Goes hand-in-hand with the PIT.
- **Longitudinal Systems Analysis (LSA):** helps inform the Annual Homeless Assessment Report (AHAR) that HUD presents to Congress which informs strategic planning for federal, state, and local initiatives designed to prevent and end homelessness.
- **System Performance Measures (SPM):** a measure of performance for the community as a whole. There are several different measures that are used as competitive elements in the CoC Program Competition through which HUD awards funding.

Rolling 12-Month Performance Reports

Each quarter HAWNY publishes a Rolling 12-Month Performance Report, commonly referred to as the Quarterly Report. This report contains a section for each homeless assistance project type (Permanent Supportive Housing [PSH], Rapid Re-housing [RRH], Transitional Housing [TH], Emergency Shelter [ES], Street Outreach [SO], and Supportive Service Only [SSO]) with performance measures related to the services each project type provides. The intent of this report is to:

- Provide timely feedback to projects to improve their services and to learn from each other
- Help funders make funding decisions based upon performance
- Evaluate our CoC's system performance

Annual Reports

Each year, HAWNY releases reports that provide a clearer picture of homelessness in our local community. These reports use HMIS data to show how many people are experiencing homelessness, the challenges they face, and the services available to help them. These Annual Reports give a detailed view of homelessness in our area, showing trends over time and highlighting where the greatest needs are.

Note that the LSA, SPM, and Annual Reports are based on the fiscal year as opposed to the calendar year. Each fiscal year is from October 1st through September 30th of the following year; 10/01/YEAR - 09/30/YEAR+1.

Roles and Responsibilities

Role	Responsibilities
HAWNY CoC Team	1. Review the DQP. 2. Collaborate with providers and HMIS Lead to find and eliminate any barriers to improving data quality.
HAWNY HMIS Team	1. Monitor data on a system-wide and individual-project level. 2. Report data to HUD through required reports such as the LSA, PIT/HIC and SPM. 3. Facilitate the understanding of data quality and address concerns. 4. Clearly communicate data requirements. 5. Provide guidance for data issue resolution.
Projects and End Users	1. Monitor project data quality. 2. Enter data in an accurate, timely, and complete manner. 3. Resolve any data issues as quickly as possible. 4. Appropriately prepare for report requirements.

Internal Monitoring by Individual Projects

In order to maintain complete and accurate records in HMIS, each project is responsible for assessing its own data quality on a regular basis. It is recommended that agencies run an Annual Performance Report (APR),

Consolidated Annual Performance and Evaluation Report (CAPER), or Data Quality report monthly, examine the data quality sections, and address any issues promptly. Projects should also regularly examine reports released by HAWNY to assess data quality and project performance. It is each project's responsibility to maintain accurate data and meet data quality standards.

Monitoring by the HMIS Lead Agency (HAWNY)

Monitoring by HAWNY will occur in two main ways:

1. CoC Monitoring Visits

At this time, only CoC-funded projects are monitored in this way.
Each agency that has signed an Agency Participation Agreement with HAWNY will be monitored at a minimum of once every three years. This form of monitoring functions similar to an audit. The agency will receive notice that HAWNY intends to conduct monitoring, and a monitoring visit will take place. See the HMIS Privacy and Security Standards document for more information. Briefly, this monitoring visit is meant to ensure that:

- HMIS Privacy and Security regulations are being met
- Paper client records match HMIS client records
- Projects are meeting HUD data quality objectives
- Projects are meeting national and local performance objectives
- Projects are in compliance with project rules and record requirements
- Projects operate in a consistent, effective, and efficient manner that is aligned with the project's intent.

2. Continuous Monitoring

HAWNY conducts ongoing monitoring of HMIS data quality throughout the year. The HMIS Team regularly assesses projects' data quality for completeness, accuracy, and timeliness, as well as adherence to best practices. If any issues arise, HAWNY staff will reach out to the project to either alert them of the issue and provide guidance on how to resolve it, or request information so that it can be resolved by HAWNY. The HMIS Team will continuously collaborate with projects to resolve any data issues and concerns. Projects are more likely to be contacted by the HMIS Team about their data during federal reporting periods.

The Quality Assurance Coordinator at HAWNY will complete a Rolling 12-Month Performance Report (commonly referred to as the Quarterly

Report) on a quarterly basis. This report evaluates whether or not projects are meeting established thresholds on various data quality and performance aspects. Projects are expected to make adjustments to correct or improve any areas where they are not meeting the threshold.

Disciplinary Process

All HMIS users are expected to comply with the procedures and expectations described in the HMIS User Agreement, Privacy and Security document, DQP, and any applicable HMIS Agency Agreements. If a user fails to meet these expectations, HAWNY can implement the disciplinary process outlined below.

The disciplinary steps are applied on a case-by-case basis and may not always follow the order listed. For most general infractions, the following steps typically occur in this order. For more serious infractions, some steps, particularly the earlier ones, may be skipped.

1. **Reminder (Phone or Email).**

A member of the HMIS team will contact the user to bring attention to the issue and provide guidance on how to resolve it.

2. **Written Warning.**

If the issue is not resolved or keeps occurring, the user will receive a formal written warning via email. The warning will describe that failure to correct the issue may result in mandatory retraining or suspension of HMIS access, depending on the severity of the infraction and the discretion of the HMIS team.

3. **Retraining.**

The user will be retrained by the Training Coordinator at HAWNY, with a focus on any areas of concern.

4. **Removal of HMIS access.**

The user's access to HMIS will be revoked temporarily or permanently on a case-by-case basis.

HAWNY reserves the right to require any user to complete retraining at any time. Additionally, HAWNY may revoke HMIS access at its discretion in cases of significant breaches of the HMIS User Agreement.

Questions

Please contact the HMIS Team at HMIS@wnyhomeless.org with any questions regarding the DQP.

Documents and Links

HAWNY Website – https://wnyhomeless.org/

- Data Center – https://wnyhomeless.org/data-center/performance-reports/
  - Annual Reports
  - Quarterly Reports (Rolling 12 Month Performance Reports)
- Document Library – https://wnyhomeless.org/document-library/
  - CoC/HMIS Monitoring
  - HMIS Acknowledgement and Release of Information (ROI)
  - HMIS Consumer Privacy Notice
  - Privacy and Security
- Knowledge Base – https://wnyhomeless.org/hmis-knowledge-base/
- Meet the Team – https://wnyhomeless.org/mission-and-vision/our-team/

HUD HMIS Data Standards Manual –

Acronym Guide

AHAR - Annual Homeless Assessment Report
APR - Annual Performance Report
CAPER - Consolidated Annual Performance and Evaluation Report
CE - Coordinated Entry
CoC - Continuum of Care
DQP - Data Quality Plan
ES - Emergency Shelter
HAWNY - Homeless Alliance of Western New York
HIC - Housing Inventory Count
HMIS - Homeless Management Information System
HOPWA - Housing Opportunities for People with AIDS
HP - Homelessness Prevention
HUD - U.S. Department of Housing and Urban Development
LMS - Learning Management System
LSA - Longitudinal Systems Analysis

PATH - Projects for Assistance in Transition from Homelessness
PII - Personally Identifiable Information
PIT - Point in Time Count
PSDE - Program Specific Data Element
PSH - Permanent Supportive Housing
RHY - Runaway and Homeless Youth
ROI - Release of Information
RRH - Rapid Re-housing
SO - Street Outreach
SPM - System Performance Measures
SSO - Supportive Services Only
TH - Transitional Housing
UDE - Universal Data Element
VA - Veterans Affairs
YHDP - Youth Homelessness Demonstration Project