

**HMIS Data Sharing Guiding Principles**

1. Client focused
2. Improved coordination among agencies
3. Data Sharing SOPs are clear and understandable
4. Maricopa HMIS complies with all applicable federal, state, and local laws
5. Respect for professionals in the homeless and social service field
6. Data sharing approach is feasible in the current ServicePoint environment
7. Service delivery processes and coordination are streamlined
8. Improved care and service delivery by the CoC system

**HMIS Data Collection**

Define who is authorized to provide information about a client in HMIS (e.g. can a parent provide PPI for a dependent child, can an emergency contact provide information about a client?)

**PPI**

- Define PPI
- Define what combination of data may create PPI

**HMIS Data Sharing—“Global Sharing”**

Universal Data Elements (UDEs)

PSDQ defines additional data sharing requirements for inclusion in “Global Sharing”

- Zip code of last permanent address
- Homeless – primary reason
- Reason for exit

**HMIS Data Sharing—“Pocket Sharing” or Affinity Groups**

- Following groups are approved by CoC and managed by PSDQ – membership, data being shared, process for future sharing refinements and membership responsibilities and changes to membership
  - Heart – Singles
  - Family Housing Hub – Households with children
  - Youth
  - I-HELP
  - City of Tempe
- Additional Affinity Groups are subject to CoC Board approval and PSDQ management
- Explore possibility, feasibility and process for collapsing existing Pockets into larger affinity groups.
- Streamline process for Affinity Group membership changes
- Data universally included in all Affinity groups (standardize Affinity Shares)
  - VI-SPDAT responses and score
  - PSDEs (with exception of ?)
  - Service Referrals
  - Attachments (ID documentation, etc.)

**Define data approved for Global sharing (expanded from “Pocket” to “Global”)**

PSDE - income, benefits, insurance

VI-SPDAT questions and composite score

Services and referrals

Attachments

**Data Sharing Management**

- Develop and adopt policy for managing and reconciling data quality issues, data inconsistencies, and future process for data sharing changes
- Develop policy for incorporating data from non-HMIS systems (e.g. HomeLink and Family HUD Access database)
- Develop policy and process for reviewing applicability and required future changes to HMIS Privacy Notice and sharing agreements

**Data Sharing Monitoring and Compliance**

HMIS Lead is responsible for monitoring compliance with data sharing policies and reporting to PSDQ issues, non-compliance, and cure plan

**Data ownership**

Maricopa HMIS data are owned jointly by all stakeholders – participating HMIS organizations, persons’ PPI included in HMIS, and CoC

Reference client ownership in clients’ rights policy

Reference agency ownership in HMIS SOPs

Reference CoC ownership in HMIS SOPs

Aggregate data releases and disclosures are subject to HMIS project policy as established and updated by the PSDQ. Appropriate uses and disclosures shall be approved by the CoC Board and managed by the PSDQ.

**Draft/update the Maricopa CoC HMIS Privacy Notice**

- Sets forth CoC requirements associated with privacy and security of client-level data and HMIS systems, uses and disclosures of client PPI to third-parties
- Clarify that HMIS Privacy Notice pertains to both HMIS data and PPI collected and managed in comparable systems (e.g. By-Name-List)

**Release of Information (ROI)**

- Universal ROI is signed by all clients entering any Maricopa CoC program (separate from HMIS)
- ROI in effect for 1 year (365 days) from date of execution (release of information from HMIS, not from individual providers)
- ROI is noted/tracked in HMIS with notation of valid release and period of effectiveness
- ROI updated to include all homeless assistance projects currently participating in HMIS data sharing
- ROI updated to include all data from UDEs, Coordinated Entry assessments and processes, and comparable databases
- ROI specifies that research purposes included for research and evaluation subject to PSDQ approval
- Include reference to release of information when required by law, ethical or safety reasons when the health or well-being of individuals over-rides privacy protections

- Policy governing release of information to law enforcement personnel when a subpoena or court order is provided

**Clients' Rights**

- Policy for collecting and hearing complaints about HMIS data collection, uses and disclosures
- Right of client to view their HMIS records

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