

Calgary HMIS Initiative

# Policies and Standard Operating Procedures

Version 1.1

Calgary Homeless Foundation

308-925 7 Avenue South West  
Calgary, AB T2P 1A5, Canada

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## Section 1.0 Introduction and Definitions

### 1.1. Introduction

The Calgary Homeless Management Information System (HMIS) is a web based, electronic Client management information system providing a standardized assessment of Client needs, individualized service plans and service records. The Calgary community utilizes the HMIS to understand the nature of homelessness, develop policies and initiatives to address homelessness, and coordinate case management services. The Calgary HMIS is a product of Bowman Systems' ServicePoint™ and managed by the Calgary Homeless Foundation (CHF).

As the recipient of conditional grant funding from both provincial and federal government bodies, CHF is deemed to be a government “employee” under the *Freedom of Information and Protection of Privacy Act* (FOIP Act). As such, CHF's personal information collection, use and disclosure activities and the use of HMIS to manage this information are subject to the protection of personal information provisions of the FOIP Act. In addition, the FOIP Act governs all HMIS data that are provided by agencies that are funded in whole or in part by FOIP public bodies, whether that funding is direct or through the CHF.

The Calgary Homeless Foundation, in consultation with the HMIS Advisory Committee, has established the Policies and Standard Operating Procedures, to guide HMIS use and set forth requirements of accountability, continuity, and compliance. The Policies and Standard Operating Procedures will periodically be reviewed by the HMIS Advisory Committee and CHF to ensure ongoing viability and responsiveness.

The Policies and Standard Operating Procedures provides guidelines, requirements, responsibilities, processes, and procedures governing the operation of the HMIS. All system-wide HMIS documents and forms referenced are located at the end of this document.

### 1.2. Definitions

Many of the terms used in this Policies and Standard Operating Procedures Manual may be new to many Users. Definitions of some of these terms are as follows:

**Analysis:** Reviewing and organizing data from the HMIS into useful information.

**Authorized User:** Any individual who uses a particular software package; in this case, the HMIS.

**Client:** An individual who is a recipient of services offered by a Participating Agency at any time and from whom Personal Information may be collected.

**Client-level Data:** Data collected or maintained about a specific person. This type of data can be de-identified for purposes of data analysis, which means that personally identifying information is removed from the record.

**Data Elements:** Data comprised of both questions and response values fall into three categories: Universal Data Elements (UDEs), Program Type Assessments (PTA) and Funder Assessments (FA). UDEs must be asked by all homeless serving agencies.

**Data-mining:** A process of scanning data in the HMIS for the purpose of discovering patterns and developing data sets for analysis and reporting.

**De-identified Data:** The removal of any Client identifying information from the HMIS such that the Client record shall no longer be able to be reasonably retraced to a specific individual.

**Dissemination:** Any release of data to a non-participating entity by the CHF, a Participating Agency, or an authorized User.

**Firewall:** A method of controlling access to a private network in order to provide security of data. Firewalls can use software, hardware, or a combination of both to control access.

**HMIS:** The specific Homelessness Management Information System utilized by the CHF.

**HMIS Agency Contact:** The person responsible for HMIS oversight at the Agency.

**HMIS Program Manager:** The job title of the person at the CHF, who manages daily HMIS operations, develops and manages HMIS resources and provides HMIS system support to HMIS Users. This person has access to all User and administrative functions.

**HMIS Server:** A computer housed in Canada on a Canadian network that manages HMIS resources for use by other computers in the network. For example, a file server stores files that other computers (with appropriate permissions) can access. One file server can “serve” many files to many computers. A database server stores a data file and performs database queries for computers.

**HMIS Uses and Disclosures:** The uses and disclosures of Personal Protected Information that are allowed by these standards.

**Identifying Information:** Information that is unique to an individual and that may be used to identify a specific person. Examples of identifying information are name and Provincial Health Number.

**Participating Agency (Agency):** Any agency, organization or group who has an HMIS Participating Agency Agreement and/or contract with the CHF and that is allowed access to the HMIS database. These agencies connect independently to the database via the Internet.

**Personal Protected Information (PPI):** Any information maintained by or for an Agency about a living homeless Client or homeless individual that: (1) identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.

**User License:** An agreement with a software company that allows an individual to use a specific product. User licenses cannot be shared.

**Vendor:** The Company that wrote the software application used for the HMIS; in this case, Bowman Systems.

## Section 2.0 Introduction and Definitions

### ***2.1. The Calgary Homeless Foundation***

**Purpose:** To define the role and responsibilities of the CHF

**Policy:** The CHF will hire and assign staff to implement, operate, maintain, and monitor the HMIS.

**Responsibilities:** Enter into, and provide oversight on, contractual agreements with funders, participating Agencies, consultants, researchers, and the HMIS Vendor.

- Act as central point of communication between the HMIS Advisory Committee, participating Agencies, and the CHF;
- Provide stewardship and make positive use of the information entrusted to the CHF on behalf of the community;
- Convene and coordinate the HMIS Advisory Committee, HMIS Participant Committee, HMIS Users Group, and other meetings with HMIS Stakeholders;
- Supervise the contractual relationship between the HMIS and the HMIS Vendor;
- Provide guidance, technical infrastructure, and support to successfully operate the HMIS;
- Ensure the data collected within the HMIS is FOIP compliant.
- Mine, analyze, and report HMIS data to respond to requests for information from Participating Agencies, funders, and other community Stakeholders in compliance with the HMIS Policies and Standard Operating Procedures Section 4.6 Mining, Analyzing, and Data Dissemination.

### ***2.2. HMIS Advisory Committee***

**Purpose:** To define the roles and responsibilities of the HMIS Advisory Committee.

**Policy:** The HMIS Advisory Committee will provide guidance and recommendations to CHF, which is responsible for implementing, operating and maintaining the HMIS.

**Responsibilities:** The HMIS Advisory Committee will make recommendations to CHF on selected issues pertaining to the operation and implementation of a quality HMIS. CHF will take into strong consideration the Advisory Committee's advice in all CHF decisions as they relate to HMIS.

1) Membership: The HMIS Advisory Committee shall be comprised of representatives from various stakeholders, including homeless serving agencies, funders, researchers, Clients and CHF. From time to time, CHF may appoint additional members as content experts to facilitate and support decision making. The Advisory Committee members and their chosen proxy must be in a position to make decisions on behalf of the Calgary HMIS. Membership will be targeted at twenty (20) persons. If participation becomes inconsistent or inactive, CHF will seek replacements.

2) Areas of Guidance: In the near term, the Advisory Committee is charged to consider and make recommendations in the following areas:

- Identify the principles for the HMIS Policies and Standard Operating Procedures, including roles and responsibilities; summarizing community wide privacy requirements; data usage and disclosure standards for all information collected and entered into the HMIS; Agency inclusion policy; minimum data collection requirements; quality assurance and a system-wide reporting policy;
- Review and consider all requests for changes in the Policies and Standard Operating Procedures and provide CHF with a formal recommendation for incorporation of new policies. A formal review will be conducted on a regular basis to ensure continued relevance and in response to changes in provincial and local laws; and
- Recommend, with the HMIS consultant, the nature and general terms of agreements between the CHF and all HMIS participating agencies. This will provide critical input into the definition of roles and responsibilities for Agencies, programs, Users, and the CHF as administrator of the system.

3) Documentation: The Advisory Committee will utilize an online portal to document and archive decisions made by the group.

### ***2.3. HMIS Policies and Standard Operating Procedures Committee***

**Purpose:** To define the roles and responsibilities of the HMIS Policies and Standard Operating Procedures Committee.

**Policy:** The HMIS Policies and Standard Operating Procedures Committee will provide guidance and recommendations to the CHF and the HMIS Manager regarding the Policies and Standard Operating Procedures around HMIS operations.

**Responsibilities:** The HMIS Policies and Standard Operating Procedures Committee will make recommendations to CHF on select issues pertaining to the Policies and Standard Operating Procedures around HMIS operations. CHF will take into strong consideration the Policies and Standard Operating Procedures Committee's advice and recommendations around review of and changes to the HMIS Policies and Standard Operating Procedures.

1) Membership: The HMIS Policies and Standard Operating Procedures Committee shall be comprised of representatives from various stakeholders, including homeless serving Agencies, funders, researchers, Clients and CHF. From time to time, CHF may appoint additional members as content experts to facilitate and support decision making. The Policies and Standard Operating Procedures Committee members and their chosen proxy must be in a position to make decisions on behalf of the organization. Membership will be targeted at seven (7) persons. If participation becomes inconsistent or inactive, CHF will seek replacements.

2) Areas of Guidance: In the near term, the Policies and Standard Operating Procedures Committee is charged to consider and make recommendations in the following areas:

- Make recommendations to CHF on select issues pertaining to the policies defined by the Calgary HMIS;
- Make recommendations to CHF on select issues pertaining to the procedures defined by the Calgary HMIS;
- Develop a calendar for routinely reviewing HMIS operations;
- Identify issues or improvements, and make recommendations for HMIS operations.

3) Documentation: The HMIS Policies and Standard Operating Procedures Committee will utilize an online portal to document and archive decisions made by the group.

#### ***2.4. HMIS Audit Committee***

**Purpose:** To define the roles and responsibilities of the HMIS Audit Committee.

**Policy:** The HMIS Audit Committee will provide oversight and recommendations to the CHF and the HMIS Program Manager.

**Responsibilities:** The HMIS Audit Committee will review activities undertaken by the HMIS Program Manager with regard to operating and maintaining the HMIS and complying with the HMIS Policies and Standard Operating Procedures. The HMIS Audit Committee will make recommendations to the CHF based on findings from regular audits. The CHF will take into strong consideration the findings and recommendations from the HMIS Audit Committee.

1) Membership: The HMIS Audit Committee shall be comprised of representatives from various stakeholders, including homeless serving Agencies, funders, researchers, Clients and CHF. From time to time, CHF may appoint additional members as content experts to facilitate and support decision making. The HMIS Audit Committee members and their chosen proxy must be in a position to make decisions on behalf of the organization. Membership will be targeted at seven (7) persons. If participation becomes inconsistent or inactive, CHF will seek replacements.

2) Areas of Guidance: Once audit logs and reports have been determined and a baseline of appropriate outputs has been developed the HMIS Audit Committee will convene to review the materials on a regular basis. The audits will include the access and use of the HMIS by the HMIS Program Manager and the timely communication and resolution of HMIS issues.

3) Documentation: The HMIS Audit Committee will utilize an online portal to document and archive decisions made by the group.

#### ***2.5. HMIS Reporting Committee***

**Purpose:** To define the roles and responsibilities of the HMIS Reporting Committee.

**Policy:** The HMIS Reporting Committee will provide guidance and recommendations to the CHF regarding the mining, analyzing and releasing of HMIS data.

**Responsibilities:** The HMIS Reporting Committee will make recommendations to CHF on select issues pertaining to the release of reports that include data elements not contained within the predetermined set of data tables. CHF will take into strong consideration the Reporting Committee's advice in all CHF decisions as they relate to the release of these reporting data elements from the HMIS.

1) Membership: The HMIS Reporting Committee shall be comprised of representatives from various stakeholders, including homeless serving Agencies, funders, researchers, Clients and CHF. From time to time, CHF may appoint additional members as content experts to facilitate and support decision making. The Reporting Committee members and their chosen proxy must be in a position to make decisions on behalf of the organization. Membership will be targeted at seven (7) persons. If participation becomes inconsistent or inactive, CHF will seek replacements.

2) Areas of Guidance: In the near term, the Reporting Committee is charged to consider and make recommendations in the following areas:

- Make recommendations to CHF on select issues pertaining to the release of reports that include data elements not contained within the predetermined set of data tables;
- Define additional core data sets for future reporting needs that are not available in the UDEs and PTAs;
- Develop a calendar for routinely producing data sets and reports;
- Identify and make recommendations for resolving data quality issues to ensure that reported data are reliable and appropriate for their intended use.

3) Documentation: The HMIS Reporting Committee will utilize an online portal to document and archive decisions made by the group.

## ***2.6. Calgary HMIS Program Manager***

**Purpose:** To define the roles and responsibilities of the HMIS Program Manager.

**Policy:** The CHF will provide an individual to oversee day-to-day HMIS operations and monitoring. The individual is guided by the HMIS Advisory Committee.

### **Responsibilities:**

#### Daily Operation

- Manage contractual agreements between the CHF and Participating Agencies;
- Provide guidance to Agencies on implementing and maintaining the HMIS Policies and Standard Operating Procedures as needed;
- Auditing access to and use of HMIS to document full participation and compliance by participating agencies;
- Monitor data quality with regard to accuracy, timeliness and completeness and notify agencies if problems arise;
- Conduct data quality assessments once a year at minimum; and if possible, more frequently;

- Conduct annual onsite data quality and HMIS Policies and Standard Operating Procedures review at participating agencies;
- Store and maintain all HMIS-related files, records and documents;
- Audit compliance with the Calgary HMIS Policies and Standard Operating Procedures; and
- Develop and generate reports for the CHF and Participating agencies in compliance with the Policies and Standard Operating Procedures.

#### Develop and Manage Resources

- Researching, interpreting and preparing information for grant applications and other funding sources as needed;
- Support the submission and coordination of proposals and grant applications with participating agencies and representatives;
- Manage activities to ensure compliance with funding requirements, regulations and policies; and
- Ensure that relevant components of the 10-Year Plan to End Homelessness are integrated into the HMIS structure.

#### System Support

- Provide ongoing training on data entry, reporting, privacy practices and security requirements;
- Provide Participating Agencies with assistance to support their successful use of HMIS, including on-site support;
- Operate a help-desk during normal business hours and respond to all inquiries in a timely manner;
- Conduct HMIS User Group meetings to discuss HMIS updates, data quality, reports and system use issues;
- Manage the HMIS User interface to enhance usability for Participating Agencies;
- Coordinate and assist in data migration and ongoing data sharing with external data systems;
- Issue software User licenses, grant access to authorized Users, and manage password recovery;
- Manage software version updates and standardized notifications process to all participating agencies;
- Monitor issues related to contractual performance of the HMIS software vendor pertaining to software development, system upgrades, hosting and data protection services;
- Monitor technical aspects of system functioning, speed, and database back-up procedures of the HMIS; and
- Monitor issues related to privacy, including conducting and reviewing a Privacy Impact Assessment.

### ***2.7. Participating Agency***

**Purpose:** To define the roles and responsibilities of the Participating Agency.

**Policy:** A Participating Agency using the HMIS will oversee the Agency's usage of HMIS and compliance to the HMIS Policies and Standard Operating Procedures.

### **Responsibilities:**

- Sign the system-wide HMIS Participating Agency Agreement annually indicating a commitment to implement and adhere to all Policies and Standard Operating Procedures set forth;
- Designate an HMIS Agency Contact to represent the Agency at HMIS meetings and manage the Participating Agency's use of HMIS;
- Participate in the HMIS Users Group;
- Only request User licenses at a security level that allows no more access to information than needed to perform job responsibilities;
- Ensure authorized Users who need access to the HMIS in relation to job duties have proficient skills to use a web-based Client management information system;
- Establish and maintain a confidentiality policy that includes procedures related to Client confidentiality, staff misconduct, and violations;
- Establish Agency protocols and practices that adhere to the Policies and Standard Operating Procedures (CHF may provide guidance and sample language if needed);
- Maintain Agency computer hardware and Internet connectivity;
- Apply security measures as outlined in the Security Policy to all the systems where confidential Client data is stored, including, but not limited to an Agency's networks, desktops, laptops, mini-computers, mainframes, and servers (CHF can provide guidance on meeting this policy);
- Ensure Agency has adequate technical support to successfully access the Internet and comply with all system and security requirements;
- Encourage and monitor data quality;
- Comply with the CHF's HMIS Privacy Policy and monitor ethical data collection and maintenance;
- Establish an Agency procedure to accept and consider all Client requests to view and correct her/his information maintained in the HMIS;
- Comply with HMIS grievance procedure to accept and submit all Client grievances about the HMIS privacy and security policies and practices to the HMIS Program Manager;
- Comply with necessary data collection in compliance with the Policies and Standard Operating Procedures;
- Require each member of the Agency's staff (including employees, volunteers, affiliates, students, contractors, and associates) to sign (annually or otherwise) an Agency based confidentiality agreement that acknowledges receipt of a copy of the HMIS Privacy Policy and that pledges to comply with the HMIS Privacy Policy before accessing the HMIS; and
- Secure any paper or other hard copy containing Personal Protected Information (PPI) that is either generated by or for HMIS, including, but not limited to reports, data entry forms, and signed HMIS Release of Information (ROI) forms.

### **2.8. HMIS Agency Contact**

**Purpose:** To define the roles and responsibilities of the HMIS Agency Contact.

**Policy:** Participating Agencies will provide a single point of contact (or multiple if Agency site is large) for all HMIS communication and coordination.

**Responsibilities:**

- Provide a single point of communication between the CHF and Authorized Users;
- Make request for interface changes and field additions to the HMIS Program Manager for approval and prioritization;
- Ensure the Agency collects and maintains UDEs and as appropriate, Funder Assessments;
- Ensure a management representative from the Agency attends the HMIS Users Group meetings.
- Ensure Agency staff with access to the HMIS have attended training and have signed the HMIS User Agreement;
- Assist Authorized Users with password recovery;
- Inactivate a User HMIS account if there is a suspected breach or misuse of the HMIS;
- Notify all Agency Users of HMIS software downtime;
- Monitor and report the Agency's compliance with all privacy and security requirements;
- Report all potential and actual breaches in HMIS privacy and security Policies and Standard Operating Procedures to the HMIS Program Manager; and
- Review and process requests by Clients to inspect and/or correct Client information maintained in the HMIS.

***2.9. Authorized HMIS User***

**Purpose:** To define the roles and responsibilities of the Authorized User.

**Policy:** Prior to accessing the HMIS all Users must complete training and execute an HMIS User Agreement.

**Responsibilities:**

- Read, sign, and comply with the system-wide HMIS User's Agreement;
- Protect the privacy and confidentiality of Client information collected and maintained in the HMIS;
- Notify the HMIS Agency Contact of all potential and actual breaches in privacy and/or security;
- Comply with Policies and Standard Operating Procedures;
- Collect and record all required data elements (UDEs, Funder Assessments);
- Create passwords that meet requirements contained in [section 5.4];
- Never share password and username with anyone (including other Participating Agency staff, Supervisors, and Executive Directors); and
- Never store or display written information specifically pertaining to User access (e.g., username and password) in any publicly accessible location.

## Section 3.0 Participation Standards

### **3.1. Participating Policy**

**Purpose:** To define the minimum requirements of Agencies using HMIS.

**Policy:** Agencies using the HMIS agree to comply with the HMIS Policies and Standard Operating Procedures.

**Procedures:** Agencies accessing the HMIS will execute and comply with the HMIS Participating Agency Agreement;

- Agencies are responsible for troubleshooting and resolving Agency-based technical issues;
- Agencies must meet the minimum information security, hardware, and connectivity requirements indicated in section 3.2; and
- Agencies migrating data from an Agency database must first clean, update, document, and export data in a format compatible with the import requirements of the HMIS software. The HMIS Program Manager and the HMIS Vendor will provide support and guidance during the migration process.

### **3.2. Hardware and Software Requirements**

**Purpose:** To define the hardware, software and Internet connectivity requirements for all Participating Agencies.

**Policy:** Participating Agencies will obtain hardware, software, and Internet connectivity that meets or exceeds the HMIS Vendor recommendations.

**Procedures:** The Agency will support the hardware, software, and Internet connectivity required to meet the minimum HMIS Vendor's specifications.

Minimum Requirements:

- Workstation:
  - Memory:
    - If Windows 7: 2 Gig recommended
    - If Vista: 4 Gig recommended, (2 Gig minimum);
    - If XP: 2 Gig recommended, (1 Gig minimum);
  - Monitor: Screen Display - 1024 by 768 (XGA); and
  - Processor: Dual-Core processor.
- Software:
  - Virus Protection software: Virus definitions must automatically update;
  - Anti-malware software: Malware definitions must automatically update; and
  - Firewall: Hardware or Software (if software solution, it must automatically update.
- Internet Connectivity: DSL or faster.
- Internet Browser:

- Firefox 3+ is recommended;
- Internet Explorer 7 is also supported; and
- No additional plug-ins required.

Recommended Practices:

- Microsoft Windows: Update as patches become available;
- Browser: Update as patches become available; and
- Workstation Maintenance: Provide regularly scheduled best practice maintenance on all workstations.

Use of technology infrastructure that is not compliant to the standards and requirements can result in slow performance and pose a security risk.

### ***3.3. User Licenses***

**Purpose:** To define the allocation of User licenses.

**Policy:** User licenses will be assigned and managed by the HMIS Program Manager in compliance with contractual agreements with the HMIS Vendor and HMIS Participating Agency Agreements.

**Procedures:** The HMIS Program Manager will work with the Agency to determine the number of licenses needed to successfully use the HMIS. A User license is assigned to an Authorized User once the User has successfully completed the Authorized User training. Sharing a license is strictly prohibited.

If an Agency needs additional User licenses, the HMIS Agency Contact will submit a written request to the HMIS Program Manager indicating:

- the number of licenses needed;
- the name of each staff person to be granted a license; and
- the access level for each staff person.

The cost of the additional licenses includes license support and maintenance fees to be paid annually to the CHF.

### ***3.4. Contract Termination***

**Purpose:** To provide a process to dissolve the contract between the CHF and a Participating Agency.

**Policy:** Either the CHF or the Agency can terminate the HMIS Participating Agency Agreement by giving a thirty (30) day written notice.

**Procedures:** Termination of the HMIS Participating Agency Agreement does not automatically release the Agency from any other contractual obligation to the CHF, including indemnification, confidentiality, and system integrity and security, all of which survive termination of the Agreement.

Agencies terminating the HMIS Participating Agency Agreement while being funded by CHF must still provide data to CHF in a machine readable format that can be imported into HMIS from their now external database to meet funder requirements.

Upon termination of the HMIS Participating Agency Agreement, the CHF will provide the Agency with a copy, in machine-readable format, of the Agency's data collected and maintained in the HMIS. The CHF and Agencies using the HMIS may continue to access the data collected by said Agency based on the nature of a shared data system.

While the information was originally collected by one Agency, other Agencies given access to that data by means of a signed ROI, may have now incorporated that data into their case files. Such information will not be removed from the system. Audit information regarding collection, addition, and deletion will also be maintained.

## Section 4.0 Collection, Use and Disclosure of Personal Information

### **Definitions**

<b>Term</b>	<b>Definition</b>
CHF	Calgary Homeless Foundation
FOIP	Freedom of Information and Protection of Privacy Act
HIA	Health Information Act
HMIS	Housing Management Information System
HS	Government of Alberta Human Services
Personal Information	"Personal information" as defined in the Freedom of Information and Protection of Privacy Act
PIPA	Personal Information Protection Act

#### **4.1. Compliance with Privacy Legislation**

**Purpose:** To ensure that each HMIS Participating Agency is aware of, and complies with the specific conditions imposed by the Freedom of Information and Protection of Privacy Act (FOIP), the Personal Information Protection Act (PIPA), Health Information Act (HIA) or other legislation as applicable, under which the collection, use and disclosure of Personal Information are authorized.

**FOIP Compliance:** HMIS shall be FOIP compliant, even if such compliance is not required of some Agencies using HMIS.

**Policy:** Participating Agencies must identify the privacy legislation that applies to them so that they understand how this affects their collection, use and disclosure of Personal Information and its storage and management in HMIS. For those Agencies funded by CHF, the FOIP Act applies as a minimum standard. For all other Agencies, the HMIS Participation Agreement requires compliance with PIPA as a minimum standard. Although PIPA may apply to an Agency, HMIS is always subject to FOIP.

**Procedures:** All Agencies accessing and utilizing Personal Information from the HMIS will confirm with the HMIS Program Manager all contracts and applicable legislation that governs the Personal Information that they collect, use and disclose. This will inform CHF and the Agency about Personal Information that may be entered into HMIS. Refer to 4.3.

#### **4.2. Obligation to Protect Personal Information**

**Purpose:** To define the custody and control of Client records stored in HMIS.

**Policy:** An Agency’s Personal Information privacy obligations are determined by its custody and/or control of the Personal Information it collects, uses and discloses.

“Control” refers to the authority of an Agency to manage the record, including restricting, regulating and administering its use, disclosure or disposition. “Custody” refers to physical possession. HS has control of the Personal Information entered into the HMIS by CHF-funded Agencies while CHF has custody of all Client records as prescribed by its Grant Funding Agreement with HS. For all other Agencies, their control of Client records may be limited by funding agreements with other parties while CHF has custody of all Agency Client records as prescribed by the Agency Agreement signed with each Agency.

**Procedures:** The Client is the owner of any information he/she provides to an Agency. Any Agency that collects and stores Client information in the HMIS has control of the data (subject to funder agreements that prescribe Personal Information collection, use and disclosure requirements) it enters into the HMIS and has a right to obtain access to that information directly through the HMIS.

The CHF owns the HMIS and under its Agency Agreements, has custody of the data. As the steward of the data, CHF is responsible for the operation and maintenance of the HMIS and has a right to access the data entered into the HMIS. Data that has been entered into the HMIS is retained in the HMIS for seven (7) years from the last Client contact and cannot be deleted. Data can be made inactive at the Agency’s request. Inactive data will remain in the HMIS database but will not be accessible to Participating Agencies.

### ***4.3. Collection of Personal Information***

**Purpose:** To ensure that Authorized Users will only ask Clients for information necessary as authorized by the law, to provide services, comply with contractual agreements, support evaluation and research, and improve or better coordinate services.

**Policy:** Unless the Agreement otherwise specifies or the CHF otherwise directs in writing, an Agency may only collect or use Personal Information that is necessary for the performance of its obligations, or the exercise of the Agency’s rights, under the Agreement.

**Procedures:** The following rules apply to the collection of Personal Information:

1. Legislative authority to collect each data element must be verified by the HMIS Program Manager.
2. Client consent cannot be used to override collection that is not legally authorized.
3. The amount of Personal Information collected must be the minimum amount necessary to provide services and to carry out the described Agreement purposes in a reasonable manner.
4. Personal Information must not be collected “just in case” it might be needed in the future.

A request for additional data fields by an Agency requires prior approval of the HMIS Program Manager. The HMIS Agency Contact will submit a request in writing to the HMIS Program Manager. The HMIS Program Manager will review the HMIS to ensure that the proposed data element does not already exist and to validate that its collection is authorized by the applicable privacy legislation. If the element does not exist, the HMIS Program Manager will work with the HMIS Agency Contact to create the data element in the HMIS.

#### ***4.4. Manner of Collection of Personal Information***

**Purpose:** To establish direct collection as the primary method for obtaining Personal Information and to allow the Client to know the purpose of the collection of Personal Information and how the information will be used.

**Policy:** Any data entered into HMIS requires FOIP verbal notification to be read by the case manager and understood by the client at the time of collection.

**Procedures:** The following rules apply to how Client Personal Information is collected:

1. Authorized Users will verbally inform Clients that they are collecting and managing the Client's information in the HMIS (If Participating Agencies prefer, Authorized Users can still collect the Client's written consent in the form of the FOIP Client Consent Form).
2. Authorized Users must read and understand the agency data collection policy around verbal notification.
3. Authorized Users will maintain a copy of the signed Client Consent Form if they chose to use written consent for HMIS data collection;
4. Authorized Users will not knowingly enter false and/or misleading information into the HMIS.

See Attachment F for The FOIP verbal notification; Attachment H for the Agency Data Collection Policy; and Attachment I for the FOIP written Client consent form

#### ***4.5. Client Awareness of Privacy Rights***

**Purpose:** To promote Client awareness of their privacy rights.

**Policy:** All Authorized Users must comply with the HMIS Privacy Policy and make the HMIS Privacy Policy available to Clients.

**Procedures:** Each Participating Agency will post an HMIS Information Poster in intake areas or in a comparable location to provide all Clients an opportunity to learn about the HMIS Privacy Policy. See Attachment I.

HMIS Client Brochures will be made available in languages and reading levels commonly understood by Clients.

The brochure outlines the Client's rights and HMIS practices around privacy and confidentiality. As well as the risks and benefits of providing information for the HMIS. See Attachment H.

Agencies must identify someone who can answer a Client's questions about data collection. The person cited should be familiar with the program, and be able to explain why the Personal Information is being collected and how it will be used by and disclosed to other Agencies.

#### ***4.6. Use of Personal Information***

**Purpose:** To limit the use of Personal Information collected from Clients only for the purpose for which it was obtained or a consistent purpose; for another purpose with Client consent; or, for purposes allowed under the disclosure sections of the applicable privacy legislation.

**Policy:** Unless the CHF otherwise directs in writing, the Agency may only use Personal Information if that use is for the performance of its obligations or the exercise of its rights under their Participating Agency Agreement.

#### ***4.7. Inter-Agency Personal Information Sharing Through Referral***

**Purpose:** To define Personal Information sharing through referrals between Agencies utilizing the HMIS.

**Policy:** Data sharing is permitted between Agencies in accordance with the applicable privacy legislation, the FOIP ROI consent of individual Clients and the proper agreement of participating HMIS Agencies.

**Procedures:** When an Agency refers a Client to a second Agency, the referring Agency may only disclose Personal Information if the Client has signed a FOIP ROI Consent Form.

The referring Agency will store a copy of the signed FOIP ROI Consent Form in the Client's physical file for auditing purposes or may scan the FOIP ROI Consent Form and attach it to the client's HMIS record.

In all cases where Personal Information is disclosed, the Agency disclosing the Personal Information must document the release of this information in a disclosure log book, recording the date, time, Client name, name of the receiving Agency, the particulars of the information disclosed, and the reason for the disclosure.

#### ***4.8. Disclosure of Personal Information***

**Purpose:** To provide parameters for disclosure of Client information by CHF funded Agencies.

**Policy:** No Personal Information about an identifiable individual shall be disclosed to any individual or organization without the express written consent of the individual, or of a duly authorized representative of the individual, except that Personal Information stored on HMIS may be accessed by duly authorized HMIS Users from the Agency that contributed the Personal Information.

**Procedures:**

#### System-wide, Multi-Agency, and Programs not funded by the CHF:

- Aggregate reports released by the CHF will make every attempt not to allow for the disaggregation of included data to prevent the identification of non-funded individual agencies without their consent.
- External requests for data of programs not funded by the CHF will be directed to the Agency Representative of the program. The HMIS Manager will only release program information about non-funded programs with permission of the Agency overseeing those non-funded programs.
- The CHF will adhere to all applicable privacy legislation when releasing aggregate reports, making every reasonable effort to protect against the re-identification of records and ensuring that data sets are sufficiently robust to avoid identification of unique individuals.
- Aggregate reports will be approved by the HMIS Reporting Committee upfront and the CHF will be able to run such data tables on an ongoing basis to ensure efficiency and expediency. Special requests outside of this predetermined set of data tables will be handled by the Reporting Committee.
- Data released for research purposes is limited to aggregate, non-identifying information from the predetermined data tables. Data requests for research or statistical purposes that fall outside the data table will be sent to HS through the HMIS Reporting Committee for Ministerial approval.

#### Non- Individual Agency:

- Agencies will use and disclose information in accordance with funder contractual obligations, the inter-Agency Data Sharing Agreement and the FOIP ROI Form.
- Agencies will adhere to all applicable privacy legislation and funder contractual obligations when releasing aggregate reports, making every reasonable effort to protect against the re-identification of records and ensuring that data sets are sufficiently robust to avoid identification of unique individuals.
- Non-CHF-funded Agencies have the right to use and disclose information from their individual Agency HMIS database without permission from the HMIS Program Manager.
- In the case where two (2) Non-CHF-funded Agencies or more would like to merge their data for the purposes of analysis and disclosure, they must notify the HMIS Manager to ensure this activity is recorded for the HMIS. The HMIS Manager should be enlisted as a resource in this process to ensure highest standards of research are applied.

#### CHF-funded Programs:

- The CHF reserves the right to produce aggregate reports on all programs that the CHF funds as outlined in the CHF Project Funding Agreement with Agencies receiving those funds.
- The CHF is contractually obligated to provide data to its funders, including HS and HPS, on programs funded by the CHF for the purposes of monitoring and evaluation.
- The CHF Program Specialists will not request Client or program-level information directly from the HMIS Manager. Requests for data for the purposes of program evaluation will always be directed to the Participating Agency Representative. It is

incumbent on the Agency to provide such data pursuant to the funding agreement to their assigned Program Specialist. If the Agency needs assistance they may request the assistance of the HMIS Manager. CHF's Program Specialists have no authority to request for, nor directly access Agency data from the HMIS. However, analytic tables for the purposes of trend analysis, funding applications, or community assessment may be generated and provided to Program Specialists for their expert opinion on such data. These data do not constitute nor satisfy the reporting requirements of CHF-funded agencies to provide data to the CHF for the purposes of program evaluation

- Any additions to the funding portfolio of the CHF may require amendment to the HMIS Participating Agency Agreement.

#### ***4.9. Release of Personal Information for Research Purposes***

**Purpose:** To ensure that research requests are handled centrally by CHF.

**Policy:** CHF does not routinely disclose information for research or statistical purposes. CHF-contracted Agencies must forward all research requests to CHF.

**Procedure:** All requests for Personal Information for research or statistical purposes must be forwarded to the HMIS Manager. The HMIS Manager will forward the request to the HMIS Reporting Committee for consideration. Requests for research purposes using data generated by HS-funded programs must receive Ministerial approval. Please contact the HMIS Manager for HMIS Data Release Forms.

#### ***4.10. Client Right to Request a Correction of Personal Information***

**Purpose:** To ensure that a Client who believes that the information held about them in the HMIS is inaccurate (in error or something omitted), has the right to ask for the information to be corrected.

**Policy:** Clients have the right to view and receive copies of their records at their request and the right to ask for information to be corrected. Agencies must consider a Client's verbal or written request to receive copies of her/his Client information in the HMIS and/or to correct inaccurate and/or incomplete Client information in the HMIS.

**Procedures:** Client can make either a verbal or written request to receive a copy of his/her information in the HMIS. Agency Staff will direct requests to view, receive a copy, and/or correct Client information maintained in the HMIS to the HMIS Agency Contact.

When the Agency provides the information to the Client, the Agency must offer to explain any information the Client may not understand.

When making a request to change information in the HMIS a Client must provide documented proof of the change in their information whenever possible.

If the Agency agrees the information is inaccurate or incomplete, the Agency must delete or change the inaccurate and/or incomplete information. If the Agency believes there is a

discrepancy between the Agency's observation-based information and the Client's requested changes, the Agency must input what the Client requests, and include a written annotation to the Client's information in the HMIS, indicating the Agency disagrees with the information and the requested change.

When an Agency decides to correct an error, all records containing the Personal Information must be corrected. This includes records in all information systems – paper and electronic. Similarly, when an Agency decides to add omitted information, all systems must be updated. The record should be annotated with the date of the correction. If the change is significant, then the Agency must inform other Agencies to whom the information was previously disclosed.

A Client's request to view and/or correct her/his information can be denied if the Agency believes that reviewing the information may result in harm to the individual or to others. However, this denial must be done with guidance from a FOIP expert and in accordance with the FOIP Act.

#### ***4.11. Client Grievances***

**Purpose:** To ensure that there is a process for handling Client grievances about the use disclosure or management of the Client's Personal Information in the HMIS.

**Policy:** The Agencies will accept and consider Client questions and/or complaints about the HMIS. If the Participating Agency is unable to resolve the Client's concerns, the Agency will submit the Client's grievance to the CHF.

**Procedure:** The Agency will respond to all questions or complaints about how the Agency has managed, used, or disclosed the Client's Personal Information in the HMIS. If the Client's concerns are not resolved or if the concerns are related to a potential breach, the Client's grievance must be documented and sent to the CHF. To document the Client's grievance, the Participating Agency Staff will complete and submit the Client Grievance Form to the HMIS Manager at the CHF, 308-925 7 Avenue Southwest, Calgary, AB T2P 1A5, Canada. The Agency will not deny services to a Client or the Client's household members for submitting a grievance.

The Agency will also inform the Client of their right to submit a grievance directly to the CHF and provide the Client with the HMIS Manager's contact information. The Client can submit their grievance verbally or in writing using the Client Grievance Form.

#### ***4.12. Reporting a Privacy/Security Breach***

**Purpose:** To ensure that all privacy or security breaches follow the same reporting procedures.

**Policy:** If an Agency employee becomes aware of a breach or it happens to the employee themselves, it must immediately be reported to the HMIS Agency Contact and the HMIS Manager immediately who will then inform HS.

**Procedures:**

Different incidents can result in various levels of harm or risk. The HMIS, in consultation with the HS FOIP Coordinator, will investigate the incident to determine the level of harm and any follow-up required to prevent the incident or breach from reoccurring. Typical questions that an investigation might address include:

- What were the circumstances that led to the breach?
- Who was involved?
- What information was lost, accessed, altered, or destroyed (includes short term losses)?
- What risk is there as a result of the loss – e.g. was the information encrypted, etc.?
- What level of sensitivity can be attributed to the unauthorized access/loss?
- Is there a need to alert Clients whose information may have been accessed?
- Were all Policies and Standard Operating Procedures in place and being followed?
- Do the policies/practices need to be reviewed and enhanced?
- Could the incident have been avoided?
- Is there a risk of a repeat incident?
- What measures need to be put in place to avoid further similar incidents?

***4.13. Records Retention and Disposition***

**Purpose:** To provide records retention and disposal requirements for Client records in the HMIS.

**Policy:** Client records contained in the HMIS are retained for seven (7) years from the last Client contact. System logs of User access and records of Client data releases and disclosures will be retained for ten (10) years. When data has met the retention period it will be archived as aggregate, de-identified information, or subject to HS prior written approval, destroyed.

**Procedure:** At the end of each calendar year, the HMIS Program Manager will run an audit report of all Client records to determine the last date of Client contact. Client records that exceed the retention period will be reviewed with the Agencies that served the Client to ensure the accuracy of the audit report. Once confirmed, the records will be exported to an aggregate, de-identified archive. Client data, subject to HS prior written approval, will be deleted from the HMIS server(s).

System logs of User access and activities will be maintained for ten (10) years at the office of the HMIS Program Manager. After ten years, and subject to HS prior written approval, the HMIS Program Manager will destroy all paper and electronic Client records so they cannot be reasonably recovered.

The Client's signed FOIP ROI Consent Form documenting the Client's written consent to release information and disclosure records will be retained for ten (10) years by the Agencies that requested and/or disclosed Client data. After ten years, and subject to HS prior written

approval, the Agency will destroy all paper and electronic copies of the information so they cannot be reasonably recovered.

#### **4.14. Data Collection and Entry**

**Purpose:** To define the protocols for data collection and entry into the HMIS.

**Policy:** Data collected and entered into the HMIS will be accurate and meet the minimum agreed upon data elements.

**Procedures:** Data elements comprised of both questions and response values fall into three categories: UDEs, PTAs, and FAs. The Client's responses will be entered and stored in the HMIS upon FOIP verbal notification of collection. The Client may refuse to have their information entered into the HMIS.

1. All Authorized Users on the HMIS will ask, collect, and enter the UDEs into the HMIS.
2. All Authorized Users on the HMIS will ask, collect, and enter their PTAs into the HMIS.
3. Agencies that fall under FOIP must have the authority to collect FAs from respective funders to comply with legislation.

Participating Agencies have the responsibility of implementing and managing a procedure for timely entry of Client data. The Agency agrees to ensure all Authorized Users are trained on these procedures.

The Agency is encouraged to reinforce with staff the importance of entering accurate, timely data into the HMIS through staff evaluation and data monitoring.

#### **4.15. Data Quality**

**Purpose:** To set goals and provide information on the process for ensuring quality of the data within the HMIS.

**Policy:** All Agencies are responsible for the quality of data entered into the HMIS and will participate in a process of improving data quality.

**Procedures:** All Agencies will strive to collect, enter, and maintain quality data in the HMIS that is timely, complete, accurate, and consistent.

##### Standards of Data Entry

- **Timely:** The data entered into the HMIS should include the most current Client information. The Agency will enter intake data into the system within seven (7) working days of the intake.
- **Complete:** The data entered into the system will be as complete as possible and at a minimum, will include all UDEs. Missing and incomplete data can negatively impact the HMIS by under reporting an Agency's and/or the community's efforts. Incomplete

Client identifiers can increase the number of duplicate records in the system and also negatively impact the usefulness of the HMIS.

- **Accurate:** The data entered into the HMIS will reflect accurate Client identifiers and the current status of Clients. If information is unknown to the Client or the Client does not answer the question, the Agency will identify it as such as opposed to selecting an inaccurate response. Due to the critical nature of data accuracy, the Agency will place accuracy as a priority and encourage it at all levels. The Agency will routinely monitor for errors, including those resulting from misspellings, transposing numbers, interchanging name fields, and illegible intake forms. Inaccurate Client identifiers and status can lead to duplicate Client files and misleading and wrong information. Inaccurate data results in a misrepresentation of the nature of homelessness in Calgary and thus obstructs efforts to prevent and end homelessness.
- **Consistent:** The data entered into the system should be collected and entered into the system in the same way by all Users. All Users will be educated on the meaning of the questions being asked and the appropriate response categories.
- **Exceptions:** if it is impossible to contact the client when an assessment is due, the Agency may answer only those questions they can with absolute certainty.

#### Data Quality Goals:

- **UDEs:** Each Agency will have 85% of all data elements entered monthly.
- **Funder Assessments:** Each Agency will have 85% of all data elements entered monthly.

## Section 5.0 Operation and Technical Standards

### **5.1. Training**

**Purpose:** To delineate HMIS training requirements and benefits.

**Policy:** Training is required for all HMIS Users prior to accessing the HMIS and is provided by the HMIS Team on a regular basis.

**Procedures:** The HMIS Team will provide regular training to Participating Agency staff on the use of HMIS. Upon completion of training, Agency staff should reasonably understand how to enter and extract data from the HMIS. Participating Agency staff will be permitted access to the HMIS contingent on completing User Training, reading the Policies and Standard Operating Procedures, and submitting a signed copy of the HMIS User Agreement to the HMIS Team.

Basic User Training Agenda:

- Introduction to HMIS;
- Review Privacy and Security Policy;
- Understand data quality requirements;
- Discuss support request procedures;
- Logging into system;
- Record Client consent to release information;
- Enter agreed upon Client and program data; and
- Produce reports.

### **5.2. User Access, Awareness and Sanctions**

**Purpose:** To secure access to the HMIS.

**Policy:** Only Authorized Users will have access to the HMIS. Each HMIS User will have an individual username and password that may not be shared with anyone for any purpose. If an Authorized User no longer needs access to the HMIS, the HMIS Agency Contact will notify the HMIS Program Manager and their access will be terminated.

**Procedures:** The Authorized User will be issued a unique username and temporary default password after the Authorized User completes User Training, verifies they have read the Policies and Standard Operating Procedures, and signs the HMIS User Agreement.

If an Authorized User has lost or forgotten her/his password she/he can ask for password recovery assistance from the HMIS Agency Contact or the HMIS Program Manager.

If an Authorized User no longer needs access to the HMIS the Authorized Users credentials will be removed from the HMIS.

The Agency is responsible for all Authorized User activity on the HMIS and must ensure only appropriate staff have access.

If there is a suspected breach and/or misuse of the system, an Authorized User's access may be suspended until such time as the issue is resolved.

#### *Access Monitoring Plan*

The Calgary HMIS software application maintains an audit trail that tracks User log-in attempts for a minimum of six months. The Calgary HMIS application maintains an audit trail that tracks the deletions to Client records (including the actual assessment entry, date deleted, and username) for a minimum of six months and a record of deleted Client records (case number, intake information, data deleted, and username) for a minimum of one year.

The Calgary HMIS application records transactional data on all other Client information for historical and audit purposes. Each entry reflects the User that created the entry and the date and name of the User that made the most recent modification. Bowman Systems' ServicePoint™ software is designed to automatically fulfill these obligations.

The Calgary HMIS Manager must review audit records semi-annually for evidence of violations of system misuse. Audits may include reviews of User data activity to identify inactive Users and reviews to determine instances of simultaneous User logins to identify User account sharing.

The Agency Administrator must review these logs with appropriate frequency and at least semi-annually for its Agency's Users to determine unauthorized or inappropriate access to Calgary HMIS Client records.

Agencies should also institute internal monitoring methods to ensure compliance with the HMIS Policies and Standard Operating Procedures.

Agencies may be required to demonstrate that they are complying, and/or may be subject to technical and policy monitoring by the HMIS Audit, Policy & Procedures Committee.

All Users and custodians are obligated to report suspected instances of noncompliance and/or security violations to an Agency Administrator, who will inform the Calgary HMIS Manager, who will then inform the Minister of HS.

#### *Violations and Sanctions:*

All reported potential violations of any security protocols will be investigated by the CHF with the advice of the Calgary HMIS Audit, Policy & Procedures Committee.

Any User found to be in violation of security protocols will be sanctioned accordingly.

Sanctions can include, but are not limited to:

- A formal letter of reprimand;
- Suspension of system privileges;
- Revocation of system privileges;

- Termination of employment for Participating Agency staff;
- Criminal prosecution; and
- Civil prosecution.

A Participating Agency's access may also be suspended or revoked if serious or repeated violation(s) of the SOPs occur by Agency Users.

All Calgary HMIS sanctions will be imposed by a team comprised of the Calgary HMIS Manager and the VP Strategy.

All breaches will be reported by the CHF to the HS by the HMIS Manager.

Calgary HMIS Sanctions can be appealed to the Calgary HMIS Audit, Policy & Procedures Committee.

Police reporting and/or criminal prosecution sanctions will be recommended by the Calgary HMIS Policies and Standard Operating Procedures Committee.

### ***5.3. User Account Procedures***

**Policy:** The Calgary HMIS Manager may create a new User ID, inactivate a current User ID or delete a current User ID for eligible individuals based on the following procedure. The Calgary HMIS Manager must document that the following activation/inactivation/deletion procedure has occurred prior to conducting said activity.

**Purpose:** To inform all parties involved with the Calgary HMIS of the requirements to activate/inactivate/delete a Calgary HMIS User.

**Procedures:** If the Participating Agency wants to authorize system use for a new User, the Agency CEO (or an authorized designee) must:

- Determine the access level of the proposed Calgary HMIS User according to those outlined in Calgary HMIS Policies and Standard Operating Procedures: User Access levels; and
- Authorize the creation of a User account for the specified individual by completing an Calgary HMIS User Account Request Form that designates the access level.

The proposed Calgary HMIS User must:

- Attend applicable training (once enrolled by the Agency Administrator) as described in Calgary HMIS Policies and Standard Operating Procedures: CALGARY HMIS USER TRAINING REQUIREMENTS.
- Execute a Calgary HMIS User Agreement.

The Agency Administrator must:

- Input the User information into a Calgary HMIS New User Request Form for Calgary HMIS Manager approval.

- Enroll the potential Calgary HMIS User in the required training.

The Calgary HMIS Manager shall:

- Review HMIS records about a potential program User to ensure that the individual does not have previous policy and procedure violations that would prohibit access to the Calgary HMIS, as determined by the Calgary HMIS Manager in conjunction with the HMIS Policy and Procedure Committee.
- Verify that the required documentation (Calgary HMIS User Agreement) has been correctly executed and submitted.
- Verify that required training has been successfully completed.

If the Participating Agency wants to inactivate or delete a current User, the Agency Admin (or an authorized designee) must:

- Authorize the inactivation/deletion of a User account for the specified individual by completing a Calgary HMIS User Account Request Form and submitting it to the Calgary HMIS manager.

#### ***5.4. User Types and Data Access***

**Purpose:** To determine the appropriate type of access for each User.

**Policy:** User licenses will be assigned at a security level that allows no more information than needed to perform job responsibilities.

**Procedures:** The HMIS Agency Contact, in conjunction with the HMIS Program Manager, will determine the physical access controls appropriate for the Agency's organizational settings and the Agency's Users.

<b>Position &amp; Job Title</b>	<b>User Role</b>	<b>Type of Access (Read, Write, Edit)</b>	<b>Description of Information this User Can Access</b>
<b>Vendor System Administrator</b>	System Administrator	RWE	All information including Client identifiable information and Agency-specific information
<b>HMIS Program Manager</b>	System Administrator	RWE	All information including Client identifiable information and Agency-specific information

<b>Executive Director</b>	Administers Agency-specific information; able to audit Agency User access; able to enter and view Client information	RWE (at the Agency-level and for any programs that fall under the Agency)	User can access all Agency profile information (necessary for Agency setup), User information, and Client information that has been input by any User within the Agency or that has been specifically shared with the Agency. Can delete Agency Administrator account.
<b>Agency Administrator</b>	Administers agency-specific information; able to audit agency User access; able to enter and view Client information	RWE (at the agency-level and for any programs that fall under the Agency)	User can access all Agency profile information (necessary for Agency setup), User information, and Client information that has been input by any User within the Agency or that has been specifically shared with the Agency.
<b>Case Manager</b>	Enters and updates Client information necessary for the case management process	RWE (at the program-level)	User can access all Client files that are created or updated by the programs to which the User has been given access; User will manage assessments, case notes, referrals, and service information.
<b>Agency Staff</b>	Enters and updates Client information necessary for the case management process	RWE (at the program-level)	User can access all Client demographic information within the files that are created or updated by the programs to which the User has been given access; User will manage Client demographic, services provided and service records.

### ***5.5. User ID and Password Specifications***

**Purpose:** To delineate HMIS User ID protocols and Password specifications.

**Policy:** The HMIS system and all electronic HMIS data must have, at a minimum, a User authentication system consisting of a username and a password.

**Procedures:** User Access levels will be approved by the Agency's HMIS Agency Contact in consultation with the HMIS Program Manager. The access levels assigned to the User should be reflective of the access a User has to Client-level paper records and should be need-based. The HMIS Program Manager will issue the User ID and password to the User. User ID and Passwords are to be assigned to individuals who have passed the Calgary HMIS Training and who have understood and signed the Calgary HMIS User Agreement.

The HMIS Program Manager will provide the Authorized User with a temporary password that is automatically generated by the Calgary HMIS. The initial password may only be communicated to the User to which the password belongs. After logging in to the system for the first time with the temporary password, the User will create a personal password not known to the HMIS Team.

If a User unsuccessfully attempts to log onto the system three times, the User ID will be “locked out,” access permission will be revoked, and the User will be unable to gain access until their password is reset. To reset a password, the User must contact their HMIS Agency Contact or the HMIS Program Manager.

#### User ID and Password Specifications

- The User ID will be the first initial and full last name of the User. If a User has a first initial and last name that is identical to a User already in the system, the User ID will be the first initial and last name plus the numbers “01”;
- Passwords will reset every forty five (45) days;
- You may not use a password you have used recently;
- Password must be at least eight (8) characters long;
- Passwords must include at least four (4) numbers and four (4) characters;
- Passwords may not use, or include, the username, the HMIS name, or the HMIS Vendor’s name;
- Passwords may not consist entirely of any word found in a dictionary or any English word spelled backwards; and
- A one-time password will be provided by the HMIS Program Manager for initial entry into the HMIS application; upon entry the User will create a password that is only known to them.

### ***5.6. Technical Support***

**Purpose:** To provide reasonable expectations for HMIS technical support by the HMIS Program Manager.

**Policy:** Technical support after the End Users initial training in the access and use of the HMIS System is available to all HMIS Users and is provided by the HMIS Program Manager on a regular basis.

**Procedures:** The HMIS Program Manager will provide regular helpdesk support hours during business hours and after hours if an emergency arises. Helpdesk hours are available from 9:00AM to 5:00PM Monday through Friday. The helpdesk can be reached by calling [helpdesk number TBA] or emailing the HMIS Program Manager at [email TBA]. Depending on the nature, current volume of requests, and urgency of the need, the support may need to be scheduled. The HMIS Program Manager will call or email the User within 24 hours of the request to either provide a solution or to schedule a response.

The HMIS Program Manager will assist in isolating problems related to the Agency's hardware (i.e. servers, routers, workstations, and firewalls), internet connectivity, or software installed on the Agency's hardware. Once identified, the Agency will need to seek assistance through third-party technical support, internal technical support, manufacturers, or service providers to resolve these problems.

Type of Support Request that can be Made Directly to the HMIS Program Manager:

- Accessing the system;
- Troubleshooting software issues;
- Any suspected security problems; and
- Any suspected security or privacy breaches.
- Data quality support
- Training and refreshers

Types of Support that must be requested through the HMIS Agency Contact:

- Setting up a User Account;
- Purchasing User licenses;
- Additions or alterations to Assessments;
- Additions or alterations to Picklists and Dropdown Menus; and
- Development of Reports.

### ***5.7. Legacy Data Migration Options and Procedures***

**Purpose:** To inform Agencies of the options and process for migrating an Agency's legacy data into the HMIS.

**Policy:** Agencies can import identifiable Client data if it meets specific data privacy and import standards.

**Procedures:** The HMIS Program Manager will establish data quality and completeness thresholds to be met before data transfers are approved. All Agencies migrating data from an Agency database must first clean, update, document, and export data in a format compatible with the import requirements of the HMIS software. The HMIS Program Manager and the HMIS Vendor will provide support and guidance during the migration process. The CHF will not subsidize the cost of migrating data that are only relevant to a single Agency or that requires extensive analysis from both the HMIS Program Manager and the HMIS Vendor.

The Agency will need to provide the following to the HMIS Program Manager and the HMIS Vendor:

- Data Dictionary – complete with table and field descriptions, data types, data formats, ranges of values, acceptable values, foreign keys, etc.
- Data Relationship Diagram – detailed mapping of all relative data

- Sample Data – a sample of 10-20 Client records that includes the full set of all data tables and fields for those records.

### ***5.8. Data Integration Options and Procedures***

**Purpose:** To inform Agencies of the options and process for integrating their data into the HMIS.

**Policy:** Agencies can integrate identifiable Client data if it meets specific data privacy and import/export standards.

**Procedures:** The HMIS Program Manager will establish data quality and completeness thresholds to be met before data transfers are approved. All Agencies integrating data through regular data transfer schedules from an Agency database must first clean, update, document, and export data in a format compatible with the import requirements of the HMIS software. The HMIS Program Manager and the HMIS Vendor will provide support and guidance during the initial migration and ongoing integration process. The CHF will not subsidize the cost of integrating data that are only relevant to a single Agency or that requires extensive analysis from both the HMIS Program Manager and the HMIS Vendor.

The Agency will need to provide the following to the HMIS Program Manager and the HMIS Vendor:

- Data Dictionary – complete with table and field descriptions, data types, data formats, ranges of values, acceptable values, foreign keys, etc.
- Data Relationship Diagram – detailed mapping of all relative data
- Sample Data – a sample of 10-20 Client records that includes the full set of all data tables and fields for those records.

### ***5.9. HMIS Software Updates and Upgrades***

**Purpose:** To provide information to HMIS system Users on the process of updating and upgrading HMIS software.

**Policy:** The HMIS will be updated and/or upgraded to ensure the system is running in its most secure and stable version.

#### **Procedures**

- The HMIS Program Manager will notify the Agency of all updates and/or upgrades to the HMIS through E-mail to the HMIS Agency Contact, and on the HMIS ServicePoint Dashboard.
- The notice will include the impact of the update and/or upgrade on the system, data, and reports;
- All updates and/or upgrades will occur no sooner than one week after the notice; and
- HMIS Agency Contact must read the impact notification and notify the HMIS Program Manager of all concerns regarding the impact of the update and/or upgrade within 48 hours of the scheduled update and/or upgrade.

### ***5.10. Agency Security Specifications***

**Purpose:** To ensure data accessed at the Agency level is protected and meets baseline security standards.

**Policy:** The Agency must comply and monitor HMIS security at their Agency.

**Procedures:** The CHF protects the information on the HMIS server and access to the server. The Agency is required to implement the security standards set forth in this policy to protect the Client data being entered into the HMIS. The security at the Agency includes, but is not limited to, password protection, virus protection, malware protection, firewall protection, workstation security and media disposal. The CHF recommends Agencies refrain from downloading sensitive Client information to Agency workstations and servers.

- **Password Protection:** The Agency will ensure all Users understand that an HMIS username and password cannot be shared with anyone and is not transferable. All HMIS activities carried out under a User account are maintained in a log and the User assigned to that account will be responsible for activities that occur under that User's account;
- **Virus Protection:** The Agency will purchase, install, and maintain commercially available virus protection software on all computers and servers accessing the HMIS. Virus protection must automatically scan files as they are accessed by Users on the system where the HMIS data is accessed and/or stored. The virus protection software must automatically and regularly update virus definitions;
- **Malware Software:** The Agency will purchase, install, and maintain commercially available malware protection software on all computers and servers accessing the HMIS. Malware protection must automatically scan the system where HMIS data is accessed and/or stored. The malware protection software must automatically and regularly update the malware definitions;
- **Firewall Protection:** The Agency must protect the HMIS from malicious intrusion by using a secure firewall. Each individual workstation does not need a firewall, as long as there is a firewall between that workstation and any systems, including the Internet and other computer networks, located outside of the organization;
- **Workstation Security:** The Agency must staff computers at all times if such computers are used to collect and/or store HMIS data and are stationed in public areas. When any computer used to collect and/or store HMIS data is not in use and staff is not present, steps should be taken to ensure the computers and data are secure and not usable by unauthorized individuals. When any workstation used to collect and/or store HMIS data is not in use for a short-period of time, a password protected screen saver should automatically turn on. Password protected screen savers are a standard feature with most operating systems and the amount of time can be regulated by an Agency;
- **Data Transfer Security:** Client personal information is not removed from the agency's premises without authorization. This includes carrying information on a cell phone or USB drive. Client personal information transmitted by email is encrypted or password protected. Transitory or obsolete electronic and paper records are regularly destroyed using appropriate methods.
- **Media Disposal:** The Agency will ensure only Authorized Users access electronic and print media containing Client information. Agencies must use proper methods to

destroy HMIS data on electronic and print media (e.g. shredding print media and erasing the magnetic field of electronic media (i.e. hardware, floppy disks, magnetic tapes) to ensure data cannot be reconstructed, recovered, or restored.

### ***5.11. Central Server Operations and Location***

**Purpose:** To ensure the data on the server is secure and resides within Canada.

**Policy:** The CHF requires the HMIS vendor to uphold all federal, provincial and local security standards and will receive regular security status reports from the vendor.

**Procedures:**

- **Availability:** The CHF provides oversight management of the HMIS and the HMIS Vendor's services. The HMIS Vendor is contractually obligated to ensure that the HMIS is available to Authorized Users on a consistent and continual basis except, but not limited to, the following: natural disasters, widespread power outages, and scheduled downtime. If the Vendor does not meet this obligation, the Vendor is required to make a penalty payment to the CHF. In the event of an unscheduled downtime; the HMIS Program Manager will email the HMIS Vendor to re-establish access to the system and notify HMIS Agency Contacts when the system went offline and when access is re-established. For upgrades, updates, and scheduled downtimes, the HMIS Program Manager will notify HMIS Agency Contacts one week prior, providing the purpose, the anticipated impact, and projected time for re-establishing access. The HMIS Program Manager will keep a log of all scheduled or unscheduled downtimes indicating causes and corrective actions.
- **Storage Location:** The servers that house all HMIS data are located in Cambridge ON, Canada. The specific address is kept confidential for security purposes and is on file at the CHF headquarters. Please direct all inquiries regarding the servers to the HMIS Program Manager.
- **Access:** Central server, mini-computer, mainframe hosting database, and/or application software is kept in a secure room with appropriate environmental controls and physical access to the system is monitored and logged. User authentication for all individuals accessing data on the server is required.
- **Encryption:** All transmission of data between the Agencies terminal and the server are protected with an industry standard, 128-bit encryption by VeriSign;
- **Virus Protection:** Server-side virus protection automatically scans files as they are accessed by Users on the system where the HMIS application is housed. Virus protection is automatically updated. Server-side firewalls protect the HMIS server from malicious intrusion.
- **Backup and Recovery Services:** Server-side disaster protection and recovery creates a back-up of the system and database to a secure location off-site; location of the system and database server is secure and equipped with temperature control and fire suppression systems as well as surge suppressors; Routine data back-up to tape or other format that is stored securely off-site within Canada; and
- **User Monitoring:** The System is able to provide a User access log upon request that indicates the time of access, the duration, and the information that was viewed, altered or deleted.

## Section 6.0 Associated Documents

### ***Attachment A: Minimum Data Elements – Calgary HMIS***

Data elements comprised of both questions and response values fall into three categories: Universal Data Elements (UDEs), Program Type Assessments (PTAs), and Funder Assessments. The Client's responses will be entered and stored in the HMIS upon FOIP verbal notification of collection. The Client may refuse to have their information entered into the HMIS.

#### I. Universal Data Elements:

All Authorized Users on the HMIS will ask, collect, and enter the UDEs into the HMIS.

1. Client Name
2. Date of Birth
3. Gender
4. Primary Ethnicity
5. Aboriginal Group
6. Current Citizenship and Immigration Status
7. Postal Code or Neighbourhood of Last Permanent Address
8. Primary Residence Immediately Prior to Program Entry
9. Does Client require specialized housing accommodations due to a disability?

#### II. Program Type Assessments:

Agencies are categorised by program types. The PTA questions are customised to these program types.

1. Outreach
2. Prevention
3. Emergency Shelter
4. Short-Term Supportive Housing
5. Rapid Rehousing
6. Housing with Intensive Supports
7. Permanent Support Housing
8. Support Services
9. Affordable housing

#### III. Funder Assessments:

Agencies may have FAs for funder reporting requirements.

***Attachment B: Participating Agency Agreement***

To be added upon Executive Director review and signature.

**Attachment C: User Set Up**

**User Account Request Form**

**CALGARY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)**

Request Date: \_\_\_\_\_

Effective Date: \_\_\_\_\_

**User Account Request – Please check one only:**

- New User
- Change User information
- Inactivate User
- Delete User

**Agency Information for End User**

Agency Name:

\_\_\_\_\_

Telephone Number (\_\_\_\_) \_\_\_\_\_ Ext: \_\_\_\_\_

Agency Address:

\_\_\_\_\_ (Street) \_\_\_\_\_ (Postal Code)

Program(s):

\_\_\_\_\_  
\_\_\_\_\_

(ie - What program(s) will you be doing HMIS input/intake for?)

**Employee (User) Information**

Employee Name (print):

\_\_\_\_\_

Employee Title:

\_\_\_\_\_

Employee Work Number (\_\_\_\_) \_\_\_\_\_ Ext: \_\_\_\_\_

Employee E-Mail Address:

\_\_\_\_\_

**Attachment D: User Agreement**

***User Agreement***

***User Policy, Responsibility Statement, and Code of Ethics***

***CALGARY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)***

Date: \_\_\_\_\_

User (print full name):

\_\_\_\_\_

Employee Work Number (\_\_\_\_) \_\_\_\_\_ Ext: \_\_\_\_\_

Employee E-Mail Address:

\_\_\_\_\_

Agency Name:

\_\_\_\_\_

I understand that I will be allowed access to confidential information and/or records in order that I may perform my specific job duties and none other. I further understand and agree that I am not to disclose confidential information, and/or Client records without the prior written consent of the Calgary Homeless Foundation, unless such disclosure is required by law.

User Responsibilities:

Your User ID and Password give you access to your agency's data in the Calgary HMIS. Initial each item below to indicate your understanding and acceptance of the proper use of this access. Failure to uphold the confidentiality standards set forth below is grounds for suspension of HMIS User privileges until such time as the issue is resolved.

- \_\_\_\_\_ My User ID and Password are for my use only and must not be shared with anyone.
- \_\_\_\_\_ I must take all responsible means to keep my User ID and Password physically secure.
- \_\_\_\_\_ I understand that the only persons who may view Client files in the HMIS are authorized Users and the Client to whom the information pertains.
- \_\_\_\_\_ I may only view, obtain, disclose, or use the database information that is necessary to perform my job and none other.
- \_\_\_\_\_ I will not leave a workstation where I am logged into HMIS unattended.
- \_\_\_\_\_ I will log off of HMIS before leaving the workstation, even for a short time.
- \_\_\_\_\_ I will assure that any printouts/hard copies of HMIS information will be properly secured.
- \_\_\_\_\_ I will notify my HMIS Agency Contact if I notice or suspect a breach in privacy or security.

\_\_\_\_\_ I have been given the opportunity to read the Calgary Homeless Management Information System: Policies and Standard Operating Procedures, and I will comply with them to the best of my ability.

Ethical Data Usage:

Once you have completed training and signed your User Agreement, you are entitled to access to the Calgary HMIS. In addition to the responsibilities listed above, you must also adhere to the following principles of ethical data usage.

- Authorized Users will only ask Clients for information necessary to providing services, comply with contractual agreements, and to improve or better coordinate services;
- Authorized Users will ensure that Clients understand that their data is being collected and managed in the HMIS using the FOIP Verbal Notification as a guideline;
- Authorized Users will obtain a signed Release of Information (ROI) form before sharing client data with an outside program/agency on the HMIS
- Authorized Users will maintain a copy of the ROI Form;
- Authorized Users will not knowingly enter false and/or misleading information into the HMIS;
- Authorized Users will only use data in accordance with the Privacy Policy; and
- The Calgary Homeless Foundation, Participating Agencies, and Authorized Users will adhere to the HMIS Privacy Policy.

By affixing my signature to this document, I acknowledge that I have been apprised of the Calgary HMIS Policies and Standard Operating Procedures concerning access, use, maintenance, and disclosure of confidential information and/or records that shall be made available to me through my use or the Calgary HMIS.

---

User Signature

Date

---

Agency Contact Signature

Date

## ***Attachment E: Privacy Policy***

To be added upon approval by Office of Privacy and Information Commissioner.

***Attachment F: FOIP Verbal Notification of HMIS data collection***

To be **read** to and/or discussed with all participants:

We collect personal information as per Alberta's privacy laws. We value and protect the privacy of Housing First participants. We do not share your information unless you agree to it. You may withdraw your consent at any time. We do share some data with government for research purposes. We do not share your name, date of birth, or any contact or location information. Your participation is voluntary, and you may refrain from answering questions without penalty. The information you share will not affect the quality of service you receive here. Do you have any questions or concerns about this?

**Attachment G: Agency Data Collection Policy and HMIS**  
**Agency Data Collection Policy and HMIS**  
**Calgary Homeless Management Information System (HMIS)**

**A. Introduction**

The Calgary Homeless Foundation (CHF) has created this Homeless Management Information System (HMIS) data collection policy in order to demonstrate our firm commitment to fair and compliant data collection processes. The HMIS complies with the *Alberta Freedom of Information Protection of Privacy (FOIP) Act*.

Agencies using the HMIS collect two types of information from clients accessing their programs or services: (1) information that is mandatory for the agency's operation of their programs (the "Agency Mandated Information"); and (2) information required by CHF for the agency to collect (the "CHF Mandated Information").

Agencies already have their own policies in relation to the collection of the Agency Mandated Information. Both those agency policies and this policy apply to the Agency Mandated Information. This policy also applies to the CHF Mandated Information.

This policy establishes procedures that must be used when collecting Agency Mandated Information and CHF Mandated Information from clients accessing programs or services. Specifically, this policy sets out the information gathering and dissemination practices for **collecting** personal data from clients, **storing** personal data in the HMIS, and **sharing** personal data between agencies, for all agencies utilizing the HMIS: both CHF funded and non-funded. It is important to be aware of the fact that the HMIS is one of many business tools for client data storage in the Calgary System of Care.

**B. Verbal notification of data collection**

Effective September 30, 2012, agencies will use a verbal notification for data collection replacing the prior requirement for written consent to collect information. Written consent forms are still required to share collected personal information with other programs within the Calgary System of Care. Agencies will remain FOIP compliant so long as the following steps are taken:

1. The agency shall only collect information if that information relates directly to and is necessary for an operating program or activity of the agency (section 33(c) of the FOIP Act)
2. When information is collected from a client, it shall be collected directly from the client who shall be verbally notified as to (a) the purpose for which the information is collected; (b) the specific legal authority for collection (which is section 33(c) of the FOIP Act); and (c) the title, business address and business telephone number of an officer or employee of the public body who can answer the individual's questions about the collection. Below, is a prepared statement

by the Government of Alberta, Ministry of Human Services, which must be read to clients before their data is entered into the HMIS:

*We are collecting your personal information according to the requirements of the privacy laws in Alberta. We are committed to protecting your privacy during your participation in [Agency] \_\_\_\_\_ programs. We do not share your information with anyone that you do not agree to, and you may withdraw your consent to share your information at any time. Please be aware that we do provide statistical data to the government; however they will not receive your name, date of birth, or any contact or location information (such as addresses or phone numbers). Do you have any questions or concerns about this?*

**Please ensure this statement is available to and read to all clients by staff prior to collecting client data and/or entering client data into the HMIS.**

**C. Further changes to the HMIS data collection process:**

**Anonymous clients**

Funded agencies with provincial and federal contracts with the CHF can no longer input anonymous clients into the HMIS. Clients at these agencies are benefiting from a government program and are being funded using public dollars, and therefore the government has a degree of responsibility to the public to be able to audit the program and prove that clients are being accounted for. If a client refuses to answer any of the Universal Data Elements (UDE's) or assessment questions required by the Government of Alberta or the Federal Government, then the staff member must put "Declined to Answer" in the required fields.

Non-funded agencies will still be able to enter clients as anonymous at their own discretion, however they should consult with their funders first.

**Aliases**

Funded agencies should seek to obtain legal names only and avoid aliases whenever possible. However, the CHF and our funders recognize that client aliases can and will be used by funded agencies from time to time. Non-funded programs should consult with their funders first in relation to the use of aliases.

**Intox and mental health considerations**

When serving clients who are unable to understand the verbal notification due to mental health issues or intoxication, only a client's name, basic demographics (age/gender/ ethnicity) and services received by the client (i.e. meals, shelter stays etc.) may be collected and input in the HMIS. This still allows agencies to keep track of all clients in their care at any given time for

safety reasons, to de-duplicate clients for reporting purposes and to track and account for the various resources used to care for a client.

Once the client has stabilized and is able to understand the verbal notification, then further information such as case plans and assessment info may also be collected and input.

Please note that the verbal notification will not be considered valid if read to a client who is unable to comprehend it. It is up to the case manager to use their informed judgment to decide when a client is capable of understanding the notification or not. If in doubt, do not collect any information further than demographics and services received by the client. Case managers may want to document that the client was unable to understand the notification in a log/case notes once the client has been input in the HMIS.

### **Refusal to accept the verbal notification of data collection**

Agencies are required to and have the authority to collect personal information for service provision. Data collected by agency staff is stored securely in the HMIS and is never shared without written client consent. Should a client still refuse to have their information collected after the FOIP notification has been read and discussed, the following processes will apply:

- a) CHF funded agencies:
  - I. Housing First Programs **and** all programs where funding is subject to contractual client target numbers: If the client does not provide data elements (name, demographics, UDEs, and HS assessments), as per funder mandate, they cannot participate in the program.
  - II. Shelter programs: Where the client refuses to provide any information, **CHF does not require a client to provide information to stay at a shelter**. Clients are not turned away from a shelter if they refuse to provide their information. Agencies may have other policies or procedures in this regard.
  
- b) Non-funded agencies:
  - I. If the client refuses to have their information collected and stored in the HMIS, it is at the agencies discretion to enter clients who refuse as “anonymous” or under an alias or pseudonym, unless otherwise directed by their funders.

### **Monitoring**

The HMIS Team will work with the HMIS Agency Admin to monitor agencies to ensure that:

- Agency staff understand the requirement for collection of personal information at their agency.
- Agency staff understand what verbal notification of data collection means.
- The verbal notification of data collection is read to and understood by every client.

- For clients with intoxication or mental health considerations, only name, demographics and services are collected on clients. Any further data collection will only occur after stabilisation.
- Breaches of this policy and of the FOIP Act are prevented.

### **Breaches**

A breach of these procedures or of the FOIP Act by an agency shall be immediately reported to the CHF in writing attention to: (Chantal Hansen: [chansen@calgaryhomeless.com](mailto:chansen@calgaryhomeless.com)).

**Attachment H: FOIP Client Consent Form (optional)**

**FOIP Client Consent Form  
Authorization to Enter Personal Information in the  
CALGARY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)**

The use of the Calgary HMIS to manage client information is subject to the protection of personal information provisions of the Freedom of Information and Protection of Privacy (FOIP) Act. A copy of the Calgary HMIS Privacy Policy and further reading describing the HMIS privacy practices is available upon client request.

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**Client Name (Print)**

**Date of Birth**

Dependent children, if any (first and last names and dates of birth) who are receiving services and for whom the parent is providing consent:

---

---

**I UNDERSTAND THAT:**

- My consent is voluntary, and that failure to provide consent will not result in any adverse decision about my rights, benefits or services.
- I may revoke this consent at any time, in writing, and have my record deleted.
- I may consent to the sharing of personal information on behalf of minor children for whom I have legal guardianship, or for other persons for whom I am a legal representative.
- This agency will never give out information about me/and or my dependents to anyone outside of this agency without my written consent, or as required by law through a court order.
- I have a right to see my HMIS record, ask for changes, and to have a copy of my record from this agency upon request.
- This consent will expire in 1 year from when I cease to receive services from this agency.

**Select One:**

- I do consent to the collection, storage and management of my personal information in the Calgary HMIS

---

Signature of Client

---

Print Client's Full Name

---

Signature of Witness

---

Print Witness's Full Name

**OR**

- I do consent to the use of my information anonymously (i.e. without disclosing my name) for the participation in the Calgary HMIS

\_\_\_\_\_  
Signature of Client

\_\_\_\_\_  
Print Client's Full Name

\_\_\_\_\_  
Signature of Witness

\_\_\_\_\_  
Print Witness's Full Name

**FOIP DISCLAIMER**

This personal information is being collected under the authority of Section 33(c) of the *Freedom of Information and Protection of Privacy Act* (the "FOIP Act") and/or in accordance with any applicable agreements in place. All personal information collected during the registration process, during the course of the client's stay, and for participation in any programs will be used to provide services and ensure a safe and secure environment of all our clients. All personal information stored on the HMIS will be treated in accordance with the privacy provisions of **Part 2** of the FOIP ACT. Limited, de-identified information may be provided to the Minister, Alberta Human Services for the purpose of carrying out programs, activities or policies under his or her administration (e.g. research, statistical analysis) or for receiving provincial and/or federal funding. If you have any questions, contact [{Service Provider's name and contact information}](#).

**Statement of Use:**

The Calgary Homeless Management Information System (HMIS) is a web based, electronic client management information system providing a standardized assessment of client needs, individualized service plans and service records. The Calgary community utilizes the HMIS to understand the nature of homelessness, develop policies and initiatives to address homelessness, and coordinate case management services. The HMIS is managed by the Calgary Homeless Foundation (CHF). Personal information that is collected will be used only for the purpose of providing counseling and intervention services. Services will be delivered primarily by the service providers. Where services need to be delivered by extended service providers, information will only be disclosed to them with consent. Information will not be used for any other purpose, unless required by law, and will only be disclosed to external parties with the consent of the individual to whom it pertains.

**Authority:**

FOIP s.33(c), the personal information is being collected on behalf of the Government of Alberta Human Services or another FOIP public body, and it is necessary for the operation of homeless programs being delivered on behalf of those public bodies. This consent will expire 1 year after the client has ceased receiving services under this program.

## ***Attachment I: Client Privacy Brochure***

### ***Client Privacy Brochure***

#### ***Calgary Homeless Management Information System (HMIS)***

We collect personal information from you that we consider to be important and necessary. We are required to collect some personal information by organizations that give us money to operate this program. Other personal information that we collect is important to help us understand what you need, to run our programs better, to improve social services for people throughout Calgary, and to better understand the needs of people who are experiencing homelessness or unstable housing. This information is entered into an electronic system called the Calgary Homeless Management Information System, also known as the Calgary HMIS.

When we collect and use your information we do so by following strict rules that protect your information and your rights. These rules must be followed by [Agency Name] and all of the organizations using the HMIS. Included in this Brochure is a description how we use the information in HMIS and your rights. If you have any questions please ask the person assisting you at [Agency Name].

How we might use and share your information:

- To provide and coordinate services and resources you might need. Sharing information (with your consent) allows agencies to work together on your behalf.
- To meet funder requirements in order to continue to receive payment or reimbursement for the service the agency provides.
- To carry out administrative functions such as conducting financial audits, monitoring staff, overseeing programs, maintaining and operating the HMIS.
- To create anonymous information that can be used for research without identifying who you are.
- To meet legal requirements. If required we will always try to restrict the amount of information released.
- To avert a serious threat to health or safety. If we believe that sharing your information is necessary to prevent or lessen a serious and imminent threat to the health or safety of you, another individual or the public.
- To understand the nature of homelessness and how to end it.

Your rights:

- Adding your information and your family's information in the HMIS only happens when you participate in a program at this agency.
- If you decide to decline to answer a question from the HMIS or you do not know the answer you will not be denied services from this agency.
- You can also share your information with other agencies through the HMIS. Sharing information requires your written consent.

- If you decide not to have your information in the HMIS or if you choose not to share your information with other agencies it might limit the ability of agencies to work together on your behalf.
- This agency will never give out your information without your written consent unless they are required by law or if they believe you are at risk of harming yourself or someone else.
- You can see a current list of agencies using the HMIS by asking the staff person you are working with at this agency.
- If you share information with other agencies on the HMIS, you can ask the agency to stop sharing any new information added to the HMIS by signing a Client Consent CANCELLATION form. The agency will give this form to you if you request it.
- You can have your information entered into the HMIS anonymously (without your name) if you are not participating in a CHF funded program. However if you do this, it is not possible to coordinate your care through the HMIS.
- Information about your demographics, program entry, case plans and program assessments cannot be shared unless you sign a specific agreement that allows you to pick and choose what items you agree to share.
- You can ask to see your HMIS record, to make changes to your records, and to have a copy of your record from this agency. The agency will respond to your request in a reasonable amount of time and help you understand the information in your record if you need assistance. There are special reasons that you may not be granted access to the information. If the agency does not provide the information to you, they can only do so if they are following the law.
- If you believe an agency is using or sharing your information in the HMIS against your written wishes, you can file a grievance to have your concerns reviewed and addressed. To do so you can submit a grievance form directly to the Calgary Homeless Foundation or through this agency. You can ask for the HMIS Grievance Form and staff will help you complete and file the form if you need assistance. You, or members of your family, will not be denied service because you are filing a grievance.
- You can ask for your information in the HMIS to be hidden from agencies by signing a Client Consent CANCELLATION form. Even though this information will no longer be visible to the individual agencies it can still be used to help understand homelessness in our community for up to 7 years from the last date you receive service. When information on homelessness gathered from the HMIS is released to the public, special care is taken to keep your information anonymous. For example: annually the number of people who are homeless in Calgary is published to help educate the public about this important issue.

***Attachment J: HMIS Poster***

# THIS AGENCY PARTICIPATES IN THE CALGARY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

We collect personal information directly from you that we consider to be important and necessary. We are required to collect some personal information by organizations that give us money to operate this program. Other personal information that we collect is important to provide you appropriate services, to run our programs, to improve services for homeless persons throughout Calgary, and to better understand the needs of persons who are experiencing homelessness or unstable housing situations. This information is entered into an electronic system called the Calgary Homeless Management Information System, also known as the Calgary HMIS.

The collection and use of all personal information is guided by strict standards of confidentiality. The [Agency Name] and all agencies accessing the Calgary HMIS follow policies within the Calgary Homeless Management Information System: Policies and Standard Operating Procedures.

A copy of our HMIS Privacy Policy and an HMIS Brochure describing our privacy practices and your rights are available upon request.

## ***Attachment K: FOIP ACT***

A free printable version of the [Freedom of Information and Protection of Privacy Act](#) can be downloaded from the [Alberta Queen's Printer website](#). Copies of the Act in print and electronic format can also be purchased from the Queen's Printer.

Information on the FOIP Act (including the HMIS Poster, HMIS Privacy Impact Assessment and Client Privacy Brochure) are clearly posted/available for all clients to read, and further information is made available at the client's request.

### **Making a FOIP Request**

The *Freedom of Information and Protection of Privacy Act* ("the FOIP Act") provides a formal method of requesting information held by public bodies which is not available by other means.

<http://www.servicealberta.ca/foip/making-a-foip-request.cfm>

Before making a FOIP request, contact the FOIP Coordinator of a public body if you have questions about how that public body manages your personal information, or you want to request access to information or a correction of your personal information. Contact information is available in the [Directory of Public Bodies](#) on this website.

A FOIP request must be made in writing, however, an oral request will be accepted if you are unable to make a written request. You may either complete a request form or write a letter to the public body indicating that you are making the request under the FOIP Act. Fees may be charged.

**Attachment L: FOIP Release of Information (ROI) Form**  
**FOIP Release of Information (ROI) Form**  
**Authorization to Share Personal Information in the**  
**CALGARY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)**

The use of the Calgary HMIS to manage client information is subject to the protection of personal information provisions of the Freedom of Information and Protection of Privacy (FOIP) Act. A copy of the Calgary HMIS Privacy Policy and further reading describing the HMIS privacy practices is available upon client request.

---

**Client Name (Print)**

**Date of Birth**

Dependent children, if any (first and last names and dates of birth) who are receiving services and for whom the parent is providing consent:

---

---

**I UNDERSTAND THAT:**

- My consent to share information is voluntary, and that failure to provide consent will not result in any adverse decision about my rights, benefits or services, other than limiting the ability of the organizations to work together on my behalf.
- I have been asked to disclose my individually identifying program information, and have been informed of the risks or benefits of consenting, or refusing to consent, to such disclosure. I further understand that I may revoke this consent at any time, in writing, and no new information will be shared.
- I may consent to the sharing of personal information on behalf of minor children for whom I have legal guardianship, or for other persons for whom I am a legal representative.
- I may ask for my record to be inactivated at any time whereby it will no longer be visible to participating agencies.
- I have a right to see a current list of HMIS Participating Agencies. I understand that additional agencies may join the Calgary HMIS at any time, but these agencies will not have access to my information unless I agree to disclose information to them.
- This consent to share information will end in 3 years.

I do consent to the use and disclosure of my personal information for the participation in the Calgary HMIS.

Dated and effective as of \_\_\_\_\_ (Day/Month/Year)

---

Signature of Client

Print Client's Full Name

\_\_\_\_\_

\_\_\_\_\_

Signature of Witness

Print Witness's Full Name

I hereby authorize:

\_\_\_\_\_

Insert your agency/program name (print or type)

to use and disclose my individually identifying personal information from my client file to and between the service providers below:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Check the information you wish to share:**

- Share everything with Agency(s) listed above
- Client Record (Name, Alias) [*if not shared, other items cannot be shared*]
- Client Demographics (Date of Birth, Gender, Ethnicity)
- Universal Data Elements (Postal Code, Neighborhood, Immigration/Citizenship, Primary Residence Prior to Program Entry, Disabling Condition)
- Program entry/exit dates
- Case Manager Details
- Case Plans: Notes, Goals, Action Steps
- Program Assessments

**FOIP DISCLAIMER**

This personal information is being collected under the authority of Section 33(c) of the *Freedom of Information and Protection of Privacy Act* (the "FOIP Act") and/or in accordance with any applicable agreements in place. All personal information collected during the registration process, during the course of the client's stay, and for participation in any programs will be used to provide services and ensure a safe and secure environment of all our clients. All personal information stored on the HMIS will be treated in accordance with the privacy provisions of **Part 2** of the FOIP ACT. Limited, de-identified information may be provided to the Minister, Alberta Human Services for the purpose of carrying out programs, activities or policies under his or her administration (e.g. research, statistical analysis) or for receiving provincial and/or federal funding. If you have any questions, contact {Service Provider's name and contact information}.

**Statement of Use:**

The Calgary Homeless Management Information System (HMIS) is a web based, electronic client management information system providing a standardized assessment of client needs, individualized service plans and service records. The Calgary community utilizes the HMIS to understand the nature of homelessness, develop policies and initiatives to address homelessness, and coordinate case management services. The HMIS is managed by the Calgary Homeless Foundation (CHF).

Personal information that is collected will be used only for the purpose of providing counseling and intervention services. Services will be delivered primarily by the service providers. Where services need to be delivered by extended service providers, information will only be disclosed to them with consent. Information will not be used for any other purpose, unless required by law, and will only be disclosed to external parties with the consent of the individual to whom it pertains.

**Authority:**

FOIP s.33(c), the personal information is being collected on behalf of the Government of Alberta Human Services or another FOIP public body, and it is necessary for the operation of homeless programs being delivered on behalf of those public bodies. This consent to share information will expire 3 years from the date of signing.

**Attachment M: Client Correction of Personal Information**  
**Client Request to Correct Personal Information in HMIS**  
**CALGARY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)**

Agency Name and Program:

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**Client Name (Print)**

**Date of Birth**

Request for client correction of personal information:

- Verbal
- Written

Type of personal information in HMIS requested for correction:

- Universal Data Elements
- Household Structure
- HS Assessments
- Client contact information
- Case Notes

Items of documented proof of the change in their information if necessary:

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Type of personal information in HMIS corrected or annotated:

- |   |                     |
|---|---------------------|
| <input type="checkbox"/> Universal Data Elements    | Date changed: _____ |
| <input type="checkbox"/> Household Structure        | Date changed: _____ |
| <input type="checkbox"/> HS Assessments             | Date changed: _____ |
| <input type="checkbox"/> Client contact information | Date changed: _____ |
| <input type="checkbox"/> Case Notes                 | Date changed: _____ |

Client Signature (parent/guardian): \_\_\_\_\_ Date: \_\_\_\_\_

Agency Staff Name (print):

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**Attachment N: Client Consent Cancellation**

***Cancellation of Client Consent to Share Information to Participate in HMIS  
CALGARY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)***

Agency Name and Program:

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**Client Name (Print)**

**Date of Birth**

Dependent children, if any (first and last names and dates of birth):

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The Calgary Homeless Management Information System (HMIS) is a web based, electronic Client management information system providing a standardized assessment of Client needs, individualized service plans and service records. The Calgary community utilizes the HMIS to understand the nature of homelessness, develop policies and initiatives to address homelessness, and coordinate case management services. The HMIS is managed by the Calgary Homeless Foundation (CHF).

Information collected in the HMIS database is protected and in compliance with the Calgary Homeless Management Information System: Policies and Standard Operating Procedures. Every person and agency that is authorized to read or enter information into the database has signed an agreement to maintain the security, privacy and confidentiality of the information contained therein. Any person or agency that is found to violate their agreement may have their access privileges suspended until a resolution can be reached.

PLEASE BE ADVISED that as of this date, I (and my dependents) no longer wish to participate in HMIS. This form is to be accepted as my formal authorization to this Partner Agency that my (and my dependents') identifying information will not be shared with other Agencies using HMIS from this date forward. I understand that identifying information shared in the past cannot be unshared.

Client Signature (parent/guardian): \_\_\_\_\_ Date: \_\_\_\_\_

Agency Staff Name (print):

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**Attachment O: Client Grievance Form**

**Privacy Grievance Form**

**CALGARY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)**

If you have complaints about <Agency Name>'s protection or use of your personal information in the HMIS, you can submit your grievance verbally or in writing by submitting this form to the HMIS Program Manager at the Calgary Homeless Foundation, 308-925 7 Avenue Southwest, Calgary, AB T2P 1A5, Canada. <Agency Name> will not deny services to you or your household members for submitting this grievance form.

Date: \_\_\_\_\_

Date of Incident: \_\_\_\_\_

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**Client Name (Print)**

What happened?

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Do you want to be contacted about the results?  Yes or  No.

If yes, how may we contact you?

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

Mailing Address:

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(Street) \_\_\_\_\_ (Postal Code)

**For Calgary HMIS Use**

Please describe how the problem was resolved?

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Agency Representative Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Attachment P: Client De-Activation, De-Identification, Deletion Form**  
**De-Activation, De-Identification, Deletion Form**  
**CALGARY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)**

The purging of a Client from HMIS may occur in one of two ways:

1. De-Activation: The Client record is marked as “inactive” removing the Client from all stock reports as well as the Client search population, but the Client remains in the database and their information can be accessed through custom reports generated in Report Writer or in the Business Objects Advanced Reporting Tool (ART).
2. Deletion: The Client record is completely taken out of the database by the software vendor and is no longer accessible or restorable.

The De-Identification of a Client from HMIS occurs when that Client is enrolled in an HS funded program and Client information is required to be uploaded into HS’s ETO system. Only the Client ID is retained for de-duplication purposes.

**Please complete the following:**

Employee Name:

Email Address:

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(Please print clearly.)

Agency/Program Name:

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(Please print clearly.)

**Data of the Client record to be:**

- De-activated
- Deleted
- De-identified

Client ID # \_\_\_\_\_

Client Name \_\_\_\_\_

Client DOB \_\_\_\_\_

Client Gender \_\_\_\_\_