

# San Mateo County Continuum of Care

## CoC AND HMIS GOVERNANCE CHARTER

Adopted January 17, 2014  
Revised September 1, 2016

PROPOSED REVISIONS AS OF 9/10/17  
Proposed revisions are highlighted in yellow

### I. Overview: Continuum of Care Structure and Purpose Under HEARTH

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 amends and reauthorizes the McKinney-Vento Homeless Assistance Act. HEARTH provides the statutory framework for the federal government’s response to homelessness. Among the requirements established in HEARTH is that every community establish a “Continuum of Care (CoC),” defined as “the group organized to carry out the responsibilities required under [HEARTH] and that is composed of representatives of organizations, including nonprofit homeless service providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.”

The CoC’s primary responsibilities under the HEARTH Act include the following:

- Operating the CoC
- Designating and operating a Homeless Management Information System (HMIS)
- CoC planning

The Emergency Shelter Grants (ESG) Program further requires that a jurisdiction that receives an ESG grant “must consult with the Continuum of Care in determining how to allocate its ESG grant for eligible activities; in developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and in developing funding, policies, and procedures for the operation and administration of the HMIS.”

The HEARTH Act directs each local community to establish a CoC governance structure and process, to be formalized through a written Governance Charter.

### II. San Mateo County CoC Goals and Objectives

The San Mateo County CoC has made a commitment to achieving the goals set forth in Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness.

**Commented [JS1]:** Note: removed some details of the timelines as the Opening Doors timelines may change, so better to not include the timeline in this charter

Strategies for meeting these goals are set forth in [Ending Homelessness in San Mateo County](#) the community’s strategic plan for ending homelessness among all populations by 2020.

This plan affirms the community’s commitment to meet the HEARTH measures, including: reducing the number of first time homeless households, increasing the rate of exit to permanent housing, reducing the length of time households are homeless, reducing the rate of return to homelessness and increasing participant income.

Additionally, the CoC affirms an intention to develop a system that meets the specific needs of all populations. Specific goals include:

- Homeless families are rapidly re-housed within 30 days of becoming homeless;
- Developing strategies that address the unique needs of unaccompanied homeless youth, including strategies that addresses homeless youth trafficking and other forms of exploitation;
- Ensuring that persons fleeing domestic violence are offered available safe housing and services available, and that they have options and choices, and that their personal information is protected.

The CoC’s policies, procedures, including standards for assistance, are described in Appendix B.

### **III. San Mateo County CoC Steering Committee – Structure and Function**

#### **A. Authority**

In San Mateo County, the CoC role and responsibilities are fulfilled by a committee called the San Mateo County CoC Steering Committee (“the Steering Committee”). The Steering Committee is convened and staffed by the San Mateo County Human Services Agency (HSA), Center on Homelessness. H.S.A. also serves as the CoC Lead Agency. The Steering Committee is responsible for overseeing the creation of an annual Homeless Continuum of Care plan and application to HUD for funding for projects and programs serving homeless persons. Specific responsibilities are detailed in Section V.

#### **B. Purpose**

The purpose of the CoC Steering Committee is to:

- Oversee a year-round planning process designed to guide the development of a homeless crisis response system for San Mateo County;

- Regularly assess system performance data and use data to inform system planning;
- Oversee San Mateo County's annual application to HUD for Continuum of Care funding;
- Oversee the implementation of the Homeless Management Information System (HMIS);
- Consult with the San Mateo County Department of Housing and entitlement jurisdictions on the administration of ESG funds, including funding allocations, performance standards, and evaluation of project performance.

C. Composition

CoC Regulations (578.5) require that the CoC Steering Committee be representative of relevant organizations and of projects serving homeless subpopulations and include at least one homeless or formerly homeless individual.

The San Mateo County Steering Committee shall be composed of no more than forty members. The composition of the committee is designed to ensure that the CoC solicits and considers opinions from individuals and organizations with knowledge or an interest in ending homelessness in the area. The Steering Committee shall include representatives of the following constituencies, in the following numbers.

Stakeholder Group	Number of Representatives on Committee
Non-Profit Service Providers Representing Key Service Modalities : <ol style="list-style-type: none"> <li>1. Prevention</li> <li>2. Outreach</li> <li>3. Emergency shelter,</li> <li>4. Transitional or Interim housing</li> <li>5. Rapid Re-Housing</li> <li>6. Supportive housing</li> <li>7. Affordable housing</li> <li>8. Core Service Agency/Safety Net</li> </ol>	Up to 8 (one for each modality)
Mainstream Service Systems: <ol style="list-style-type: none"> <li>1. Employment and Training System</li> <li>2. Mental Health System</li> <li>3. Alcohol and Drug Treatment System</li> <li>4. Health System</li> <li>5. Criminal Justice System</li> </ol>	Up to 5 (one for each system)

Stakeholder Group	Number of Representatives on Committee
Organizations Representing Key Subpopulations: 1. Veterans 2. Seniors 3. Youth 4. Domestic Violence Survivors	Up to 4 (one for each subpopulation)
Entitlement Cities: 1. Daly City 2. Redwood City 3. San Mateo 4. South San Francisco	Up to 4 (one for each city)
County Government Rep	1
Housing Authority Representative	1
Private Foundation Rep	1
Business Rep	1
Homeless or Formerly Homeless Individual	1
Housing Developer	1
Housing Advocate	1
Community Development/Finance Rep	1
Representative of the educational system	1
An agency that serves survivors of human trafficking	1
Disability Service Organizations, Disability Advocates	1
Lesbian, Gay, Bisexual, Transgender, Queer (LGBTQ) Advocates, and LGBTQ Service Organizations	1
At-Large Members	Up to 8
Subcommittee and Workgroup Chairs	Up to 5

#### D. Terms

Steering Committee members shall serve for three-year terms. Steering Committee members may be re-elected, with a term limit of three three-year terms (nine consecutive years). Term limits may be waived by a vote of the Steering Committee on a case-by-case basis in instances where another applicable representative of that stakeholder group cannot be identified.

#### E. Election/Nomination of Members

A new Steering Committee shall be seated each year in January. Slots that are vacant due to resignation or term expiration shall be filled through a nomination process. Nominations shall generally be solicited for vacant slots July through September, with

nominations made at the October meeting. The process for solicitation of nominations shall include outreach by Lead Agency staff and Committee members (via emails, phone calls, announcements at meetings, etc.). Specific individuals (not organizations) shall be recruited who are able to represent the constituencies described in Section C. Once a slate of individuals has been identified, the Committee will entertain nominations and elect the new members to fill the vacant slots. New members shall generally be voted in at the October meeting and will be seated in the first meeting of the calendar year.

Commented [JS2]: Made some revisions to the description of outreach

Vacancies that occur outside the regular cycle due to resignations may be filled before the October meeting. Nominations may be voted upon at any meeting following the resignation.

#### F. Meetings

The Steering Committee shall meet on a quarterly basis, usually in October, January/February, April/May and July/August (dates will be impacted by the deadline for HUD Continuum of Care NOFA as well as by the ESG funding cycle).

Meetings shall be open to any interested individual, including members of the public. Meeting announcements and agenda will be distributed to members by email at least two days prior to the date of the meeting. Agendas will be publicly posted in advance of the meeting.

#### G. Decision-Making

All actions of the Steering Committee shall be taken by vote. A two-thirds majority of Steering Committee members present shall be required to take a Steering Committee action. In circumstances that need time-sensitive action, voting may take place by email, with the vote being ratified at the next in person Steering Committee meeting.

Robert's Rules of Order shall be followed in taking Committee action. No member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.

#### H. Conflict of Interest

A Steering Committee member shall be deemed to have a conflict of interest if he or she has a prohibited conflict of interest pursuant to any of the following: the California Political Reform Act, Government Code sections 81000 *et seq.*; California Government Code sections 1090 *et seq.*, the common law prohibition against bias, or any applicable conflict of interest policy for the County of San Mateo.

The Steering Committee shall apply a reasonableness standard in determining whether a conflict exists. If a member has a conflict of interest, he or she shall declare the

conflict on the record, refrain from discussing the issue with the Committee, and recuse him or herself from voting on the matter.

#### I. Attendance

Steering Committee Members shall be expected to attend all meetings unless excused by informing HSA staff.

Each committee member may designate one proxy member to vote in his/her place if he/she is unable to attend. The proxy member must be specifically named by the member. HSA staff will maintain the membership roster and list of proxies.

If a Steering Committee member has two unexplained absences in a year, the Chair/Co-Chair may recommend that he or she be removed from the Steering Committee. Members may be removed only by a vote of the Steering Committee.

#### J. Officers

The Steering Committee shall elect either: (1) one Committee Chair; or (2) two Committee Co-Chairs. Election of officers shall take place at the meeting following the meeting at which new members are elected.

The Co-Chairs shall be responsible for chairing Steering Committee meetings and for working with Center on Homelessness staff to develop meeting agendas.

If the Chair or Co-Chairs cannot a meeting, the Chair/Co-Chairs may name an Acting Chair for that meeting. The Acting Chair must be a member of the Steering Committee (not a proxy).

#### K. Subcommittees and Workgroups

The Steering Committee shall establish subcommittees and workgroups as are necessary to conduct the work of Continuum of Care planning and submission of the CoC application. Subcommittee membership is open to any interested member of the community. Each subcommittee must have a chair or co-chairs, who are appointed by the Steering Committee Chair or Co-Chairs.

Subcommittees may include, but are not limited to:

- HMIS Subcommittee
- Performance Measurement Subcommittee (CoC and ESG)
- CoC Standards and Policies Subcommittee
- CoC Standards and Policies Committee
- Funding Group/CoC Application Review Panel

#### L. Record Keeping

In consultation with the **Chair or Co-Chairs** of the Steering Committee, staff of the Center on Homelessness shall develop and distribute agendas and minutes and perform other record keeping functions.

#### **IV. HMIS Lead Agency**

The CoC Steering Committee shall designate a lead agency for the HMIS. The HMIS Lead Agency for San Mateo County is the San Mateo County Human Services Agency, Business Systems Group (BSG). In accordance with Section 578.7(b) of the CoC Interim Rule, the CoC shall:

- Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS
- Ensure consistent participation of recipients and sub recipients in the HMIS; and
- Ensure the HMIS is administered in compliance with requirements prescribed by HUD in the HMIS Data Standards

This work shall be conducted by staff from the Center on Homelessness, Business Systems Group, and the HMIS Subcommittee.

Compliance with HMIS requirements shall be documented in the San Mateo County HMIS Policies and Procedures, which will be updated annually by the HMIS Lead Agency and reviewed and approved by the CoC Steering Committee. The HMIS Policies and Procedures are provided in Appendix C of this document.

#### **V. Responsibilities of the Steering Committee and Subcommittees**

Responsibilities of the Steering Committee are listed below.

##### A. Steering Committee

- Review and vote on nominations to fill vacancies on the Steering Committee;
- Review and approve strategies for addressing homelessness developed by lead agency, subcommittees, and workgroups;
- Review and approve an annual work plan for addressing homelessness developed by lead agency and workgroups;
- Review and approve CoC Policies and Procedures developed by the Lead Agency, subcommittees and workgroups;
- **Regularly assess system performance data and use data to inform system planning;**
- Review and approve plans for development and implementation of a Coordinated Entry System for homeless households, as developed by the Lead Agency;

- Review and approve recommendations from the Project Performance Subcommittee on performance issues, recommended corrective action, and proposed re-allocation of funds;
- Review and approve annual Collaborative Application for CoC funds; including a Rating and Ranking policy that uses objective, written criteria to review, rank and select projects for funding;
- Ensure that the CoC application process is transparent, open and that proposals from organizations who have not received CoC funds are accepted;
- Approve final Project Priority list developed by Review Panel;
- Review and act on provider appeals as needed;
- Approve methodology for annual Point in Time Count, Housing Inventory and Gaps Analysis developed by lead agency (bi-annually for street count), review and approve final count
- Review and approve annual performance standards and evaluation of outcomes for CoC and ESG programs, as developed by Lead Agency and Project Performance Work Group;
- Review and provide input on information prepared by Lead Agency for entitlement cities related to their Consolidated Plans; specifically, information relating to reducing and ending homelessness through:
  - Outreach and assessment;
  - Emergency and transitional shelter;
  - Transitions to permanent housing through shortening episodes of homelessness, access to affordable housing and prevent recurrence of homelessness, and;
  - Homeless prevention.

This information may also include PIT and/or HMIS data to help inform funding allocations for homeless programs using ESG and other sources of funding
- Review and provide input on the annual ESG funding priorities and allocations as developed by the Department of Housing;
- Provide representation to the Housing and Community Development Committee (CDBG and ESG), Interagency Council on Homelessness, and other planning bodies
- Designate an HMIS Lead Agency and information system for the HMIS software;
- Review and approve HMIS policies and procedures, privacy plan, security plan, data quality plan, and any other plan the HMIS Lead is required to develop.

The Steering Committee may choose to delegate some or all of these responsibilities to the Subcommittees or Work Groups, as described below.

**B. HMIS Subcommittee**

- Identify training and support needs for HMIS agencies regarding data quality, data entry procedures and other topics relevant to HMIS users.

**Commented [JS3]:** Changed name from HMIS Users Group to HMIS Subcommittee

- Advise HMIS Lead and Steering Committee on decisions about HMIS administration and management;
- Review all CoC data reports to include the HIC, PIT, AHAR, & System Performance Measure report;
- Review HMIS Policies and Procedures and make recommendations to CoC Steering Committee regarding approval.

**C. Performance Measurement Subcommittee**

- Reviews San Mateo County's results on the HUD system performance measures and advises the COH on strategies to improve system performance
- Advises COH on setting and updating standards for evaluating the performance of CoC and ESG funded projects
- Reviews overall results of monitoring conducted by COH to identify trends and recommend training or support that could be provided or modified to increase support to providers
- Works collaboratively with the HMIS Users Group on any needed changes to the HMIS system to track performance measures.

**Commented [JS4]:** Removed Homeless Service Providers Workgroup. The providers group will continue to be facilitated by HSA, but will not act as a CoC subcommittee

**Commented [JS5]:** The Performance Measurement Subcommittee replaces the former Project Performance Workgroup

**D. CoC Standards and Policies Committee**

- Works with H.S.A. to develop and maintain written policies and standards for CoC system operations, including Coordinated Entry
- Works with H.S.A. to develop and maintain written policies and standards for CoC and ESG assistance, including who receives what type and level of assistance and for how long;
- Works with H.S.A. on development of policies and procedures as needed to support implementation of the strategic plan to end homelessness (including policies relating to shelter, TH, RRH, PSH).

**Commented [JS6]:** The CoC Standards and Policies Committee replaces the previous System Design Group

**E. Funding Group/Project Review Panel**

- Develop and oversee an annual process for applying for HUD Continuum of Care funding;
- Recommend priorities and selection criteria for CoC project ranking for approval by Steering Committee;
- Review and rank applications from new and renewal projects; recommend final ranking to Steering Committee;
- Recommend priorities and process for ESG funding to be approved by Steering Committee.

Organizations that are recipients of CoC or ESG funds may not participate in this group/panel.

### **Attachment A: CoC Code of Conduct**

The following Code of Conduct provides a foundation of ethics for the San Mateo County Continuum of Care Steering Committee (“the Steering Committee”), its subcommittees and workgroups.

The Steering Committee prohibits the solicitation and acceptance of gifts or gratuities (anything of monetary value) by officers, voting members, and agents for their personal benefit. Ask yourself if the gift would have been offered if you did not have your position. If the answer is “No” then you should decline accepting the gift.

- A. The Steering Committee promotes impartiality in performing official duties, and prohibits any activity representing a conflict of interest. You should not act on a matter if a reasonable person who knew the circumstances of the situation could legitimately question your fairness.
- B. The Steering Committee prohibits the misuse of position. You cannot use your position with the Committee for your own personal gain or for the benefit of family or friends.
- C. Officers and voting members shall put forth honest effort in the performance of their duties.
- D. Officers and voting members shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Committee without previous Board approval.
- E. Officers and voting members shall disclose waste, fraud, abuse, and corruption to the San Mateo County Manager.
- F. A member shall be deemed to have a conflict of interest if he or she has a prohibited conflict of interest pursuant to any of the following: the California Political Reform Act, Government Code sections 81000 *et seq.*; California Government Code sections 1090 *et seq.*, the common law prohibition against bias, or any applicable conflict of interest policy for the County of San Mateo.

The Steering Committee shall apply a reasonableness standard in determining whether a conflict exists. If a member has a conflict of interest, he or she shall declare the conflict on the record, refrain from discussing the issue with the Committee, and recuse him or herself from voting on the matter.

- G. Officers, voting members and employees shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age, or disability.

Violation of any portion of this code may result in removal from the CoC Steering Committee. The code has been distributed to the Committee, its subcommittees and workgroups, as well as posted on the website of the San Mateo County Human Services Agency (the CoC Lead Agency).

**Attachment B:  
San Mateo County CoC Policies and Standards**

**1. Housing First**

The San Mateo County CoC is committed to adopting a Housing First approach throughout the homeless crisis response system. The system prioritizes rapid placement and stabilization in permanent housing and there is an expectation that programs will not have service participation requirements or preconditions such as sobriety or a minimum income threshold. Participation in these services is based on the needs and desires of the program participant. Our system:

- *Uses data on project performance to develop strategies to quickly and stably house homeless households.* We evaluate the length of stay in programs and rate of exit to permanent housing to determine if programs are being effective at meeting our system goals.
- *Engages landlords and property owners.* H.S.A. has contracted with a service provider to engage landlords and property owners on behalf of homeless households who have enrolled in rental assistance programs (permanent supportive housing and rapid re-housing) to assist them to locate and secure available rental units. In addition to this system-wide landlord engagement, individual programs also may engage landlords and property owners.
- *Prioritizes funding for projects that remove entry barriers.* The San Mateo County CoC encourages providers to remove entry criteria that are not required by a project funder. Having low barriers to entry is a scored criteria for projects requesting CoC funding (both new and renewal). Screening criteria the CoC define as “barriers” include, but are not limited to, criteria relating to: credit history, income, employment, domestic violence, sobriety/substance use, criminal record, immigration status, mental health status, or willingness to participate in services. Providers also are encouraged to remove ongoing program participation requirements that would cause participants to be terminated for any of these reasons.
- *Adopts client-centered service methods.* Projects in the San Mateo County CoC are expected to ensure that housing and service options are tailored to meet the unique needs of each individual or family presenting for services and that program participants have access to the services that they reasonably believe will help them achieve their goals.

**2. Coordinated Intake, Assessment and Referral**

In August 2016, San Mateo County H.S.A. issued an RFP to identify a provider or provider team to implement a county-wide Coordinated Entry System (CES) that:

- Covers the entire CoC geography;

- Is easily accessible for all persons who need homelessness assistance;
- Incorporates a strategy for advertising the program that is designed to specifically reach homeless persons with the highest barriers,
- Includes a standardized assessment process, and;
- Ensures that program participants are directed to appropriate housing and services that fit their needs.

Samaritan House was selected via the RFP to be the lead CES and Diversion provider, in collaboration with the Core Service Agency Network.

As the primary CES funder and CoC lead agency, H.S.A. holds overall responsibility for the design of CES and developing CES policies and standards, in consultation with the CoC Steering Committee. As the lead CES provider, Samaritan House is responsible for developing CES procedures to implement the policies, and for initial implementation and ongoing management of CES.

CES for families with children became operational in July 2017. H.S.A. and Samaritan House are developing policies and tools for the adult and youth CES, which are planned to launch in November 2017.

Family CES policies are documented in separate documents and incorporated by reference to this Governance Charter. Below is a general summary of CES goals and key elements.

The San Mateo County CoC has designed the CES to be a key element of our overall homeless crisis response. Given the large geography of our CoC, our CES has multiple entry points, all using standardized processes and tools. The entry points are the 8 Core Service Agencies as well as the Homeless Outreach Team (HOT). The HOT has been integrated into CES to ensure people in unsheltered locations are identified and prioritized for assistance.

The San Mateo County CES goals are aligned with the main goals articulated by HUD:

- Make it easier for persons experiencing homelessness or a housing crisis to access the appropriate housing and service interventions;
- Prioritize persons with the longest histories of homelessness and the most extensive needs;
- Lower barriers to entering programs or receiving assistance; and,
- Ensure that persons receive assistance and are housed as quickly as possible.

The San Mateo County CES has the broadest possible participation, including, as appropriate, local government, law enforcement, CDBG/HOME/ESG entitlement jurisdictions, affordable housing developers, education authorities, and mental health

organizations, to ensure the system provides the necessary support for homeless or near-homeless persons seeking housing and services. ||

Commented [JS7]: Note: changed section below from future tense to present tense, as CES has begun to be implemented

Key features of the San Mateo County CES, as articulated in the CES RFP, include:

1. **Screening.** The CES conducts a standardized screening and triage process to identify households experiencing homelessness. Screening takes place at designated access points into the homeless system that are widely advertised and well understood by providers and the community. The access points direct households who are not homeless or at imminent risk of homelessness to mainstream services and systems, while assisting those who are homeless to access homeless crisis response.
2. **Shelter Diversion/Problem Solving.** The CES prevents households from entering shelters by employing a shelter diversion strategy. The CES provider empowers persons facing imminent homelessness to identify safe and appropriate housing options and assist them in avoiding shelter and returning quickly to permanent housing. Shelter diversion services include a range of activities to help clients preserve their existing housing or move directly to alternative housing, and can include: mediation with landlords, family members or roommates; problem solving; linkages to mainstream systems and services; and flexible financial assistance (such as rental deposits). The goal of shelter diversion is to ensure that shelter beds are available for those households who are unsheltered.
3. **Assessment/Prioritization for Shelter and Housing.** The CES provider employs a standardized assessment tool for all clients referred to determine prioritization for housing resources. The provider places households into emergency shelter or interim housing program while in the “Priority Pool” waiting for housing assistance.
4. **Matching and Referral to Housing Programs and Resources.** San Mateo County H.S.A. operates a centralized placement list for housing interventions (RRH and PSH). The CES provider facilitates transfer of assessment and prioritization information to the County to use to match clients in the Priority Pool to homeless and housing services available to them, based upon priority level and eligibility criteria.

### **3. Policies and Standards for Administering Assistance**

The San Mateo County Continuum of Care has designed and implemented a consistent and county-wide set of policies and standards for determining which homeless households qualify for which types of assistance. These policies cover: (a) permanent supportive housing (PSH); (b) rapid re-housing (RRH); (c) emergency shelter and transitional housing; and (d) other policies and standards.

#### **a. Permanent Supportive Housing (PSH)**

The San Mateo County CoC has established a single coordinated and standardized process for access to all CoC-funded permanent supportive housing (PSH) in the community. Via the 2016 CoC application process, all PSH beds in the CoC have been

converted to dedicated PSH units (some were already dedicated; the remainder were prioritized but are now becoming dedicated units).

The PSH prioritization process will continue as described in this document until the CES for adults/youth is operational by January 2018. At that time the CE process for PSH will be integrated into the broader Adult CES system.

i. Coordinated Outreach, Referral Process and Admission Process

The CoC has established a County-wide process for conducting outreach to unsheltered chronically homeless individuals to ensure they are identified and prioritized for assistance. This includes outreach conducted by the county-funded Homeless Outreach Team (HOT). HOT conducts regular and intensive outreach to individuals living outdoors; many of whom require intensive engagement and contacts before entering housing. HOT also conducts monthly multi-disciplinary team (MDT) case conferencing meetings coordinated by H.S.A and LifeMoves. The MDT's include staff from local Police Departments, County Behavioral Health and Recovery Services (BHRS), safety net providers, and other service providers working with homeless individuals. Homeless outreach is also conducted throughout the County by BHRS (through the PATH Team), Health Care for the Homeless and Dignity on Wheels.

PSH referring agencies record contacts with homeless people into HMIS. Once an individual expresses an interest in receiving housing assistance, the referring agency will complete the Housing Authority PSH application in HMIS and will also complete the VI-SPDAT. This triggers a referral to the Housing Authority. All PSH referrals require a completed VI-SPDAT submitted along with the application.

The Housing Authority staff review all PSH referrals for their completeness of applications and move the household into the priority pool for PSH. The Housing Authority uses the VI-SPDAT score and the length of time a household has been homeless to establish an order for the priority pool. Applicants are pulled from the list in their rank order and offered the next available PSH vacancy. Households matched to a vacancy are then scheduled for an eligibility appointment at which their documentation is verified. If the household has been enrolled in a tenant-based rental assistance program, they will be assigned a housing navigator to help them locate a unit.

ii. Orders of Priority

All CoC-funded permanent supportive housing (PSH) beds in the CoC are offered to eligible chronically homeless households using the process described above, and in accordance with the order of priority set forth in CPD Notice CPD-16-11 - *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Persons in Supportive Housing*.

The San Mateo County Housing Authority maintains a centralized priority pool of chronically homeless people who are eligible to be matched to available PSH vacancies. Households must meet the new definition of chronically homeless as defined in CoC Program interim rule as amended by the Final Rule on Defining “Chronically Homeless.”

The order of priority for households on the priority pool is based on:

1. Score on the VI-SPDAT administered by the Homeless Outreach Team (HOT) – which determines severity of service needs; and
2. Length of time the household has been homeless (living in a place not meant for human habitation, a safe haven, or an emergency shelter)

The CoC ensures that all eligible veterans are referred for assistance through HUD-VASH and SSVF. Those veterans who are not eligible for these VA-funded programs may access available CoC-funded PSH beds provided they meet the chronic homelessness criteria.

#### **b. Rapid Re-Housing (RRH)**

The San Mateo County CoC has established the following policies governing rapid re-housing assistance.

##### **i. Rapid Re-Housing Guiding Principles**

Beyond ending homelessness for individual households, rapid re-housing plays a key role in ending homelessness overall. To do so effectively and efficiently, a RRH program must coordinate with the broader homeless system, not screen out large portions of the homeless population, and have a commitment to a Housing First approach.

##### ***Principles***

- In order to identify, engage, and assist as many households experiencing homelessness as possible, RRH programs will coordinate and fully participate with the broader homeless assistance system.
- Rapid re-housing is an intervention designed for and flexible enough to serve anyone not able to exit homelessness on their own.
- Rapid re-housing programs should not screen out households based on criteria such as a minimum income threshold, employment, absence of a criminal history, disability, evidence of “motivation,” etc.
- Rapid re-housing participants should have all the rights and responsibilities of typical tenants and should sign a standard lease agreement.

All RRH programs in San Mateo County will align to the National Alliance to End Homelessness’ (NAEH) “Rapid Re-Housing Performance Benchmarks and Program

Standards.” The CoC will use the performance benchmarks suggested by NAEH to evaluate programs.

ii. Standard policies and procedures for evaluating RRH eligibility

The target population for RRH programs in San Mateo County are homeless families with children and homeless adults without children. Households must be San Mateo County residents and services must be provided county-wide.

RRH assistance will be provided to households in Category 1 of the Department of Housing and Urban Development’s (HUD) Homeless Definition Final Rule:

Category 1: Literally Homeless includes an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels/motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Funding source restrictions may further limit eligibility. For example, CoC-funded RRH is currently limited to serving only those households who are unsheltered or living in emergency shelter. Some grants may also serve households fleeing domestic violence (Category 4 in HUD’s homeless definition) depending on the NOFA under which they were awarded).

Households will be identified and referred to RRH programs through the San Mateo County’s Coordinated Entry System (CES). At present, families with children access RRH through the Family CES. The Adult/Youth CES is currently under development, so at present adult RRH slots are accessed directly through the provider agency, which will continue until the adult/youth CES is implemented.

Households are prioritized for rapid re-housing based on who has a high vulnerability and significant barriers to housing. The target population includes people who are unsheltered, disabled, have low levels of income or SSI-level income, who may have evictions and criminal convictions, and other barriers to housing. RRH providers are expected to accept referrals only from the CES.

Screening, verification and documentation procedures will ensure that all households served meet HUD CoC and ESG requirements (depending on the funding source).

iii. Policies and procedures for determining which households will receive RRH assistance.

San Mateo County's Coordinated Entry System (CES) includes a standardized set of tools and processes to determine which households receive which housing interventions. Any household that is identified as being of medium to high priority and is not eligible for permanent supportive housing (due to not meeting chronic homeless criteria) may be referred to RRH. Households will not be screened out due to housing barriers such as no or low incomes; lack of employment history; disability; or assessment as not being "housing ready."

iv. Standards for determining share of rent and utility costs program participants will pay.

In RRH, the goal of Rent and Move-In Assistance is to provide short-term help to households so they can pay for housing. Activities under this core component of the Rapid Re-Housing program include paying for security deposits, move-in expenses, rent, and utilities.

***Principles***

- Rent and move-in assistance will be flexible and tailored to the varying and changing needs of a household while providing the assistance necessary for households to move immediately out of homelessness and to stabilize in permanent housing.
- All RRH programs will make efforts to maximize the number of households they are able to serve by providing households with the financial assistance in a progressive manner, providing only the assistance necessary to stabilize in permanent housing.

RRH programs will provide "the least amount of assistance for the least amount of time," while ensuring that enough is provided to be reasonably sure that the housing will "stick" and the assisted household does not return to homelessness.

v. Standards for how long a participant will receive assistance and how assistance is adjusted over time.

The intent of the rent and move-in assistance component of rapid re-housing is to enable the quick resolution of the immediate housing crisis. The majority of participants will be able to maintain housing with short-term rent assistance. Programs should start out by assuming households, even those with very low, fixed or zero

income or other barriers, will succeed with a minimal subsidy and support rather than a long subsidy, and extend these if/when necessary. Households with higher housing barriers or no income may need assistance for different depths or durations, but such households should still be assisted in immediately attaining permanent housing and the large majority will still successfully exit to permanent housing.

Programs should be attentive to the ability of a household to maintain housing once subsidy ends, but should not be entirely constrained by attempts to reach a rent burden of only a specific percentage of a participant's income—the 30% standard that is sometimes mentioned is not achieved by the majority of low-income and poor households. Instead, the program should recognize that once housed, the households will be much better positioned to increase their incomes and address their other needs.

Additionally, by not over-serving households, the program can maximize the impact of available resources to serve the largest number of households possible. The flexible nature of the rapid re- housing program model enables agencies to be responsive to the varied and changing needs of program participants and the community as a whole.

vi. Standards for determining type, amount and duration of housing stabilization or relocation services.

RRH activities will include both housing relocation and stabilization services, typically provided by a case manager. The goals of rapid re-housing case management are to help participants obtain and move into permanent housing, support participants to stabilize in housing, and connect them to community and mainstream services and supports if needed.

The amount, type and duration of case management services will depend upon the individual household need, with the goal of providing the least amount of assistance while ensuring that the household will not return to homelessness.

vii. Housing identification standards

The goal of Housing Identification is to find housing for program participants quickly. Activities under this core component include recruiting landlords with units in the communities and neighborhoods where program participants want to live and negotiating with landlords to help program participants access housing. This also includes having discussions with clients about housing options. Program staff should listen to and respect client choices about their housing (where they want to live, how much they are willing to pay, whether they are willing to share) but also must provide accurate information about the implications of those choices given the realities of the housing market.

### **Principles**

- Within the limits of the participant’s income, a rapid re-housing program should have the ability to help households access units that are desirable and sustainable—those that are in neighborhoods where they want to live in, that have access to transportation, are close to employment, and that are safe.
- Housing identification efforts should be designed and implemented to actively recruit and retain landlords and housing managers willing to rent to program participants who may otherwise fail to pass typical tenant screening criteria.
- Critical to the formation of landlord-program relationship is the recognition of the landlord as a vital partner. The RRH provider must be responsive to landlords to preserve and develop those partnerships for the purposes of future housing placements.

### **c. Emergency Shelter and Transitional Housing**

The San Mateo County CoC has established the following policies governing emergency shelter and transitional housing. For the purpose of this section, the term “emergency shelter” is used to represent both types of programs. In San Mateo, all transitional housing operates using shortest possible lengths of stay and therefore operationally is governed by the same policies as shelter.

#### **i. General Principles**

Emergency shelter is a short-term intervention designed to act as a safety net for households who are unsheltered (living outdoors, in vehicles or other places not meant for human habitation), or who are in the midst of housing crisis and have no alternative housing options. Shelters provide an entry point into stabilization services and move households towards permanent housing as quickly as possible. Individuals and families who enter emergency shelter should receive some immediate short-term case management to address and resolve current crises. Case management received in emergency shelter should focus on addressing barriers that prevent households from re-entering housing.

#### **ii. Standard policies and procedures for prioritization**

As described under Coordinated Entry, all households seeking shelter will be screened to determine whether they are literally homeless or at imminent risk of homelessness. Households that meet this screening criteria will meet with a diversion specialist to identify a housing solution if possible. Only those who cannot be diverted will receive a shelter placement.

In the event there are not enough shelter beds for all unsheltered households, beds will be prioritized using the following criteria:

- Household is unsheltered (living outdoors, in a vehicle or other place not meant for human habitation)
- Adult household member has disabling condition impairing ability to secure housing
- Adult household member has acute health or behavioral health condition
- Pregnancy of household member
- Young children in household

### iii. Standards and policies relating to eligibility and access

Policies and practices relating to client eligibility are a key component of emergency shelter programs. Emergency shelter programs should focus on serving only the households that qualify as “literally homeless.” Programs should also operate under Housing First principles, imposing minimal barriers to entry for prospective clients.

When the Coordinated Entry System (CES) is fully implemented, all shelters receiving funding from San Mateo County will be required to accept clients referred by CES. The CES provider will be responsible for screening to ensure clients referred are literally homeless and cannot identify a housing solution through the shelter diversion process.

Shelters must accept referrals from Coordinated Entry, unless the individual or family referred does not meet eligibility requirements that are mandated by a specific funder or are otherwise required by the shelter operator for legitimate reasons (e.g. physical configuration of the facility).

Programs will employ Housing First principles and seek to reduce program entry requirements that act as barriers to shelter services. This means that providers should not deny admission based on sobriety and/or an expressed commitment to becoming sober, participation in supportive services or other programming, proof of employment or citizenship, ability to pay, etc.

### iv. Standards and policies relating to provision of services

Essential to the success of an emergency shelter program is its ability to implement effective, housing-focused case management and service linkage. The effectiveness of case management is based on the rate and speed with which program participants exit homelessness to permanent housing and are provided appropriate services to do so. Emergency shelter case managers are responsible for:

- Completing an initial housing needs assessment and developing a plan to secure housing;
- Responding to clients’ immediate and short-term service needs;
- Orienting clients to shelter programs, expectations, and available services; and

- Coordinating and implementing client-centered services and support programming.

*Policies:*

- Emergency shelter programs should employ a person-centered, strengths-based approach that tailors case management to each client. Effective case management should not be a one-size-fits-all model; instead, case managers should actively work to identify the unique needs and goals of each client.
- Case management should implement Housing First principles, focusing on addressing clients' housing needs and goals.
- Participation in case management should not be mandatory. Case managers will engage with and develop a rapport with each client and offer assistance that is relevant and useful to addressing the needs the client has identified.
- Case managers should promote a safe, healthy environment for all clients at all times.
- Emergency shelter case management should employ harm reduction and trauma-informed care to tailor services to clients' needs.
- Shelter case managers should work collaboratively with any other agency staff that is providing services to the client while in shelter (e.g. a rapid re-housing program case manager). When possible, shelter case managers should ensure a smooth handoff and continuity of care with a client's new case manager.

Emergency shelter policies and procedures should employ involuntary exits as an absolute last resort strategy. Instead, case managers should support clients to manage conflict and/or any other problems that may be presented during their shelter stay.

**d. Anti-Discrimination Policy**

The Continuum of Care has adopted the following policy regarding affirmative marketing and non-discrimination.

All homeless system providers and programs receiving federal CoC and/or ESG funds, or who are under contract with the San Mateo County Human Services Agency (H.S.A.) shall affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities. Housing and services must be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR 5.105 (a)(2).

All programs shall comply with all applicable state and Federal civil rights and fair housing laws and requirements, including, but not limited to:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance;
- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance; and
- Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance. Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.
- HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.

No person shall be denied any services provided on the grounds of race, color, national origin, ancestry, age, disability (physical or mental), sex, sexual orientation, gender identity, marital or domestic partner status, religion, political beliefs or affiliation, familial or parental status (including pregnancy), medical condition (cancer-related), military service, or genetic information.

No otherwise qualified individual with a disability shall, solely by reason of a disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination in the performance of any services.

The above policies are incorporated by H.S.A. into the policies for the Coordinated Entry System (CES). Additional policies relating specifically to CES are listed below:

The CES is widely marketed and available to:

- All eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status.
- All populations and subpopulations in the CoC's geographic area, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, have fair and equal access to the coordinated entry process, regardless of the location or method by which they access the system.
- Individuals with disabilities; and
- Persons with Limited English Proficiency (LEP).

The prioritization policy and process adopted by the CoC is designed to be fair and non-discriminatory:

- To the maximum extent possible, prioritization criteria are designed to be objective and to focus on concrete housing barriers and vulnerability factors;
- Clients are not required to disclose the presence of a disability in order to be prioritized and presence of a disability by itself is not a prioritization factor.

#### **e. Other Policies and Standards**

Homeless providers funded by the CoC and ESG programs will ensure all children are enrolled in early childhood programs or in school and connected to appropriate services in the community.

Emergency shelters, transitional housing, and permanent housing—permanent supportive housing and rapid re-housing—projects within the CoC shall not deny admission to or separate family members when they enter shelter or housing.

All providers shall adopt strategies to help program participants obtain mainstream benefits.

The CoC will provide regular training for providers on topics relevant to implementation of these policies and standards, including training on how to effectively implement HUD's rule on [Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity](#).

The CoC Lead Agency (H.S.A.) shall require all providers receiving funding through H.S.A. to comply with all applicable local, state and federal anti-discrimination requirements, including prohibiting discrimination based on age, sex, gender, LGBTQ status, marital status or disability.

#### **4. Procedures for Monitoring Outcomes of CoC and ESG Recipients**

The San Mateo County Human Services Agency (H.S.A), Center on Homelessness (the CoC Lead Agency) is responsible for regular monitoring of all emergency shelter, transitional housing, outreach, supportive housing, rapid re-housing and prevention programs as part of the H.S.A.'s contract management responsibilities. This includes all CoC and ESG funded projects. Monitoring shall include site visits, analysis of spending rates, review of financial information, review of occupancy data, and a review of whether projects are meeting the performance benchmarks established by HUD and the CoC. Specific performance measures to be monitored shall include: utilization rates, increasing housing stability, participant eligibility, length of time homeless, destination upon exit, increasing income, and connecting to mainstream benefits.

The CoC Project Performance subcommittee shall work with the Lead Agency staff to conduct an annual assessment of how well CoC and ESG projects are performing, identify those that are underachieving either in terms of outcomes, spending, effectiveness, or other factors, and recommends whether projects should be offered technical assistance to improve performance or should be candidates for grant re-allocation.

The San Mateo County Department of Housing (DOH), the County's ESG recipient, is responsible for coordinating closely with the CoC in regards to ESG funding. There is a designated slot for a CoC representative on the HCDC board which allocates ESG funding. The DOH has a designated representative on the CoC Steering Committee.

The CoC Steering Committee shall consult on relevant sections of the Consolidated Plan for the County and four entitlement jurisdictions, including sections covering funding priorities for the County's ESG funds. DOH works closely with the CoC Lead Agency, the San Mateo County Human Services Agency (H.S.A), on awarding contracts, gathering community input, data analysis and contract monitoring. The CoC Lead Agency is also the HMIS Lead Agency and develops the policies and procedures for operation and administration of HMIS for ESG funded projects. The CoC Lead Agency shall evaluate and rank local applications for State ESG funding in accordance with priorities established by the CoC Steering Committee.

## **Attachment C: HMIS Policies and Procedures**

County of San Mateo  
Human Services Agency  
HMIS Policies and Procedures

*County of San Mateo's Homeless Management Information System  
will provide standardized and timely information  
to improve access to our housing and services  
and strengthen our effort to end homelessness.*

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## Contact information/User Support

Should you have any questions or technical difficulty regarding the Clarity HMIS application, or need to add or remove users, please contact the Human Services Agency, Business Systems Group Service Desk to submit a support ticket:

Human Services Agency Business Systems Group  
[HSA\\_ServiceDesk@smcgov.org](mailto:HSA_ServiceDesk@smcgov.org)  
650-802-7573

Or the County of San Mateo Human Services Agency HMIS Coordinator can help troubleshoot:

Brian Eggers  
[BEggers@smcgov.org](mailto:BEggers@smcgov.org)  
(650) 802-5083

## Background

The Homeless Management Information System (HMIS) enable data from a variety of service providers to be combined to reveal a more comprehensive picture of client needs. In San Mateo County and elsewhere, this is accomplished via the secure, private, client centric and centralized system by BitFocus (the vendor), called Clarity Human Services (Clarity).

### History

In 2000 Congress instructed the U.S. Department of Housing and Urban Development to take measures to improve available data concerning homelessness in the United States. In response, HUD obligated all Continuum of Care regions to implement region-wide databases that would allow an unduplicated count of service users.

Specifically, Congress mandated HUD to collect information on the number of persons assisted through the McKinney-Vento Act. The Omnibus Appropriations Act of 2003 (Pub. L. 108-7) in its conference committee report noted:

*HUD is directed to begin collecting data on the percentage and number of beds and supportive services programs that are serving people who are chronically disabled and/or chronically homeless . . . HUD should continue its collaborative efforts with local jurisdictions to collect an array of data on homelessness in order to analyze patterns of use of assistance, including how many people enter and exit the homeless assistance system, and to assess the effectiveness of the homeless assistance system.*

Previously in FY 1999 HUD Appropriations Act, Congress directed HUD to collect data from representative samples of existing HMIS systems,

*Collect, at a minimum, the following data: The unduplicated count of clients served; client characteristics such as age, race, disability status, units (days) and type of housing received (shelter, transitional, permanent); and services rendered. Outcome information such as housing stability, income and health status should be collected.<sup>1</sup>*

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<sup>1</sup> See Federal Register, Volume 68, No 140 (July 22, 2003) for further overview of federal mandates for HMIS.

## Eligible Programs

Programs which may use HMIS include, but are not limited to:

- Emergency **Shelters and Transitional Housing Programs** serving homeless adults, families and youth<sup>2</sup>
- Street and Community outreach programs to persons who are homeless
- Supportive Service programs serving persons who are homeless

In addition, HMIS participation is a requirement of various funders. On the Federal level, HMIS participation is mandated for all service and housing providers that receive HUD funding under the McKinney-Vento Act, which includes:

- Supportive Housing Program (SHP)
- Permanent Supportive Housing
- **Other Permanent Housing**
- Shelter Plus Care
- Section 8 Moderate Rehab for Single Room Occupancy
- Emergency Solutions Grant (ESG)
- Housing for Persons with AIDS (HOPWA)

Ideally all emergency shelters, transitional and supportive housing program, and homeless outreach programs will participate in HMIS. The more agencies that participate in the system the better. More agencies equal more comprehensive data, and therefore improved information for planning and policymaking. More users within agencies means that clients will more likely receive appropriate services, since their caseworkers may have an opportunity to see relevant case history from prior service episodes, and will have an opportunity to rely upon the systems case planning, referral, and data protection capacities.

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<sup>2</sup> In general, domestic violence shelters are prohibited from participating in HMIS by federal legislation, under the Violence Against Women Act (VAWA).

### Why is this Important?

Because agencies that serve people experiencing homelessness work for the public welfare of our communities, they must remain accountable to their program participants, funders, and community partners. One way to remain accountable is to be driven and focused on a mission and to report progress on accomplishing that mission. Programs should be transparent about what outcomes and goals they have achieved. HMIS allows programs to manage data in a secure and standardized environment that also offers an aggregate view of our county's homelessness. We hope that with better information we will be able to plan, work, and achieve greater success in serving participants with meaningful services and housing options and end a social problem that can be fixed.

### **Expectations for HMIS Partner Agencies**

Human services agencies that participate in San Mateo County's HMIS are referred to as "partner agencies." Each partner agency needs to follow certain guidelines to help keep the HMIS on track and to maintain data privacy and accuracy.

### Implementing HMIS

To prepare for participating in San Mateo County's HMIS, agency administration should:

- Dedicate at least one computer to the use of HMIS. The computer must have access to the Internet and must be running a modern browser. The computer(s) should be in an area that is not accessible to the public or any staff not cleared to see identifying information of the agency's clients.
- Familiarize themselves with HMIS by attending a HMIS training session or by calling the HMIS coordinator and scheduling a HMIS site visit.
- Decide how many system end-users they will need. "End users" are the people who will actually enter data into the HMIS and use the system to run reports that the agency will need for funding purposes, or find useful for internal management. Typical end users include intake workers and case managers. Typically, the more end-users in an agency, the more useful the system becomes.
- Familiarize prospective end-users with basic computer skills if necessary (e.g., windows, using a mouse, navigating the internet).
- Designate a primary HMIS contact within the agency.

- Develop a clear understanding of current reporting needs and funding streams.
- Understand the agency's data privacy requirements. For example, is the agency covered by HIPAA?
- Who will run reports? Which ones? How often? Note that we strongly recommend running reports on a monthly or weekly basis to help check for data errors. This particularly includes program entry and exit dates and the progress of the client receiving services. The agency is responsible for maintaining accurate data, and regularly running reports is a good way to double check that information has been properly recorded in the system. Regular reporting may also provide the agency with important information about its clients and programmatic goals.
- Data privacy practices and client informed consent. Before entering actual data, agencies must develop or adopt any necessary client notice, consent, and release of information forms, as well as their own written data privacy policy.

#### Reporting

Agencies are required to run reports in the system as directed by their funding sources, and should run these reports prior to actual report due dates to check for data entry errors. Agencies are strongly encouraged to use the systems reporting features on a more frequent weekly or monthly basis to check for data entry errors. Agencies are responsible for the quality of the data that they report.

#### General On-Going Commitments and Data Quality

Participating agencies should be prepared to commit to the following:

Maintaining accurate data. The agency should run system reports on a regular weekly or monthly basis to check for errors. The agency should contact the County of San Mateo's Human Services Agency, Business Systems Group 650-802-7573 or [HSA\\_ServiceDesk@smcgov.org](mailto:HSA_ServiceDesk@smcgov.org) if needing assistance with data correction, including deleting any client records that were entered by mistake.

Obtaining written client consent, or releases of information, for data sharing (if the agency desires to share client data with other HMIS partner agencies). HIPAA-covered agencies also must allow clients to opt out of research uses of HMIS data.

Cancel HMIS access of any end-user who is terminated from employment, leaves the agency, or needs to be restricted from the system for any other reason. The agency needs to contact the County of San Mateo's Human Services Agency, Business Systems Group 650-802-7573 or

[HSA\\_ServiceDesk@smcgov.org](mailto:HSA_ServiceDesk@smcgov.org) as soon as possible and no more than 24 hours after the end-user is terminated.

#### Information Entry Standards

- Information entered into County of San Mateo’s HMIS will be truthful, accurate and complete.
- Agency staff will not enter information about clients into County of San Mateo’s HMIS database unless the information is required for a legitimate business purpose such as to provide services to the Client, to conduct evaluation or research, to administer the program, or to comply with regulatory requirements.
- When adding to, or modifying data in, an existing client’s HMIS record, end users should check to see if that client is currently receiving services from a different HMIS partner agency (e.g., entered into, but not yet exited from another program).

#### No Conditioning of Services

Agencies shall not decline to provide any services to a client based upon a client's refusal to sign a Release of Information form or refusing to allow entry of information into County of San Mateo’s HMIS. (Note: This does not over-ride agency policies or funding restrictions that may require certain data from a client before an agency is able to serve the client. However, the client may be offered the opportunity to be entered into HMIS as a “private” client – e.g., all client information will be hidden from other provider agencies.)

#### Data Privacy and Protection

Program participants have a clear right to:

- Keep their personal information held private.
- Have their preferences with regard to the entry and sharing of client information within County of San Mateo’s HMIS respected, whether they prefer their data to be shared with other partner agencies or not.
- Request a change in their information sharing preferences.
- Refuse to allow entry of identifiable information into County of San Mateo’s HMIS without being denied services (except if entry of identifiable information is necessary for program operation).

- Have only truthful and accurate information about them entered into the system.
- Not be asked for information unless the information is required for a legitimate business purpose such as to provide services to the client.
- Inspect and obtain a copy of their own information maintained within County of San Mateo's HMIS (except for information that is used in preparation for a criminal or civil court case under release by subpoena).
- File grievances related to the HMIS without retaliation.

Agencies are responsible for the actions of their users. Among the steps each agency will take to maintain data privacy and security are:

- Access. Agencies will permit access to County of San Mateo's HMIS or client-level information obtained from it only to paid employees or who need access to County of San Mateo's HMIS for legitimate business purposes (such as to provide services to the Client, to conduct evaluation or research, to administer the program, or to comply with regulatory requirements).
- Usernames and passwords. Usernames and passwords shall not be stored or displayed in any publicly accessible location. Usernames and passwords may only be used by the person to whom they are assigned; licenses may not be shared under any circumstance. Each staff who accesses HMIS must have a unique username and password.
- Change in Employee status. If an authorized user separates from employment with a Core Service Agency or Homeless Service Provider, notification must be made via a support ticket to the HSA Services desk by contacting County of San Mateo's Human Services Agency, Business Systems Group at HSA\_ServiceDesk@smcgov.org or 650-802-7573. The ticket shall request termination of the user's rights within 24 hours of an employee leaving employment to terminate access to the Clarity account.
- Training. Each agency will only allow their staff to access County of San Mateo's HMIS after the authorized user receives appropriate confidentiality training and has signed an Oath of Confidentiality. The Oath of Confidentiality represents the user's agreement to the following terms and conditions:
  - Do not access, review or discuss client information unless required in the completion of assigned responsibilities. Do not access any information for any unlawful or improper purpose.

- Do not disclose or discuss client information to other staff who do not have a legitimate business need for that information.
- Do not attempt to access systems or client data to which you lack authorization.
- Do not attempt to access client information through a colleague(s) unless it is for a legitimate business purpose.
- Do not change or delete any client data unless such a change or deletion is part of your job function.
- Do not attempt to access client information for personal use for any reason.
- Do not attempt to access client information for use that exceeds the scope of the Clarity User's duties and responsibilities.
- Staff should collect printed client information promptly from shared printers and photocopiers. Where the technology is available, "delayed" or "confidential" printing options should be selected for highly sensitive document production. All printed client information should be shredded when no longer needed or kept in a locked cabinet.
- Do not make or store printed or media copies of client information unless it is a necessary part of your job.
- Do not share your access information (user name and password) with anyone.

#### Data Sharing

One of the potential benefits – and potential risks – of the County of San Mateo's HMIS is the ability to easily share data between agencies in a standardized format. In either case, clients have the right to control access to their data and must sign a Client Release of Information form before an agency can share information about the client with other agencies via the County of San Mateo's HMIS. Note that agency staff must be prepared to explain the HMIS system and agency privacy policies upon request.

HMIS project staff at the County of San Mateo, Human Services Agency, Center on Homelessness, will have access to all information entered into the system. The Human Services Agency routinely deals with sensitive data and abide by strict data privacy practices. The

Human Services Agency will only access identifying information for business-related reasons, including administering the database, conducting research, and preparing reports (only aggregate information will be included in reports).

#### Accountability for Noncompliance

The Human Services Agency, Center on Homelessness will review progress made by participating programs with HMIS. The Center on Homelessness may provide notice to the local Continuum of Care when agencies are found not to be in compliance with data entry or have violated the code of ethics or privacy concerns.

### **Expectations for HMIS System Administrator**

#### Providing an HMIS

As system administrator for County of San Mateo's HMIS, the Human Services Agency provides all of the necessary equipment, staff, and technology to operate and maintain the central site. This is done in partnership with the vendor (BitFocus) and San Mateo County Human Services Agency, which is the CoC Lead Agency and the HMIS Lead Agency.

In addition, the system administrator will work with Continuum of Care Coordinators, participating agencies, end-users, vendors, and other HMIS stakeholders to ensure compliance with HMIS-related rules and standards enacted by the U.S. Department of Housing and Urban Development, meaning the current HMIS Data Standard. This is to include, but not limited to:

- Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS
- Ensure consistent participation of recipients and sub recipients in the HMIS; and
- Ensure the HMIS is administered in compliance with requirements prescribed by HUD in the HMIS Data Standards

#### Notice of Planned Interruption in Service

Whenever possible, the Human Services Agency will notify participating agencies of planned interruptions to service at least 3 business days prior to the interruption.

### **HMIS Policies Continued**

#### Data Requests

Agencies will respond to all data requests submitted by individual program participants served by that particular agency. Any requests received by an agency that the agency is unable to fulfill will be forwarded to H.S.A.

Requests for inspection or copies of personal data or private information or by individual program participants shall be accommodated with no service charges or fees. Any agency, or the County of San Mateo's Human Services Agency, may deny access to information that is legally protected due to current or pending legal activity. An agency or program may deny inspection or copies of personal information if the individual program participant has requested the same data or information more than two times in a calendar year (unless substantive change have been made to the record – program participants may request another copy upon substantive change to their records).

Program participants may request amendments or corrections to their record. Any such requests shall be honored unless program staff have a justifiable reason for not making the change, including that the requested change would misrepresent client characteristics, service dates, or the like. Requests for changes that are not honored may be recorded under client case notes in the HMIS. Requests for multiple alterations in any calendar year may be denied due to administrative burden or harassment by the individual program participant (unless substantive changes have been made to the record – program participants may request additional alterations following substantive changes to their records).

#### Grievance Procedures for Individual Program Participants

Users must permit clients to file a written complaint regarding the use or treatment of their information within County of San Mateo's HMIS. Clients may file a written complaint with either the Agency/program or with the Center on Homelessness. Clients may not be retaliated against for filing a complaint.

#### Data Privacy and Security Protection Training

The Human Services Agency encourages all participating agencies or programs to routinely train their personnel on best practices in data privacy and security protection. Data privacy is emphasized in HMIS training sessions, but more general training on this topic is encouraged.

#### Data Accuracy

Agencies are responsible for the accuracy of the data they enter into the HMIS. Agencies are strongly encouraged to run reports on a monthly or weekly basis to check data and consult with the Human Services Agency to correct any problems.

The Center on Homelessness shall regularly check data quality in County of San Mateo's HMIS. Agencies, or particular end-users, that make repeated errors may be required to attend more training, or may be barred from using HMIS if they are unwilling to improve data entry practices.

Third Party Access to Data

No request for private, personal information about an individual program participant from a third party or entity shall be honored unless the request is legally binding.

All requests for system-wide aggregate data or information shall be forwarded to the Human Services Agency.

Unused Licenses

If any license goes unused for more than 90 days, that license may be terminated. The Requesting Agency will be notified prior to deactivation of the license and the agency will have 5 business days to respond with a request if the license is to be continued.

San Mateo County Continuum of Care CoC Governance Charter and HMIS Policies and Procedures were revised and approved **September 12<sup>th</sup>, 2017** by the Continuum of Care Steering Committee

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Signature

**Selina Toy Lee**  
**Director of Collaborative Community Outcomes**  
**San Mateo County Human Services Agency (CoC Lead Agency)**

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Date