

**CNYS SERVICEPOINT
Database System
Policy & Procedures**



Policies & Procedures

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Introduction

CNY Services (CNYS) through a HUD contract supported by the Continuum of Care NY-518 administers the Homeless Management Information System (CNYS SERVICEPOINT). The project utilizes Internet-based technology to assist homeless service and public service organizations across the County to capture information about the clients that they serve. The SERVICEPOINT System Administrator provides technology, training and technical assistance to users of the system throughout the service area. The goal of CNYS SERVICEPOINT is to inform public policy about the extent and nature of homelessness as a tool for other partner organizations to complete Outcome Based Performance Measures reporting. This is accomplished through analysis and release of data that are grounded in the actual experiences of homeless and at-risk persons and the service providers who assist them throughout the service area. Information that is gathered through intakes, conducted by service providers with consumers, is analyzed for an unduplicated count, aggregated (void of any identifying client level information) and made available to policy makers, service providers, advocates, and consumer representatives.

CNYS is committed to understanding the gaps in services to consumers of the human service delivery system in an attempt to end homelessness and to provide public services that are more effective. CNYS is committed to balancing the interests and needs of all stakeholders involved.

Benefits for Case Managers and Clients:

Case managers can use the software as they assess their clients' needs to inform clients about services offered on either site or elsewhere throughout the service area, available through referrals. Case managers and clients can use on-line resource information to learn about resources that help clients find and keep permanent housing or meet other goals clients have for themselves. Service coordination will be improved when information is shared among case management staff within one agency and with staff in other agencies (with written client consent) who are serving the same clients.

Benefits for Provider Agency and Users:

Aggregated information can be used to garner a more complete understanding of clients' needs and outcomes, and to advocate for additional resources, complete grant applications, conduct evaluations of program services, and report to funders such as United States Department of Housing and Urban Development (HUD) and the State of New York. The software has the capability to generate required reports including the HUD Annual Progress Report (APR), Emergency Solutions Grant (ESG) Monthly Statistical Report, and other reports as requested.

Data Integrity:

Data is the most valuable asset of CNYS SERVICEPOINT. It is our policy to protect this asset from accidental or intentional unauthorized modification, disclosure, or destruction. All CNYS SERVICEPOINT participants are also required to input at least the minimum data requirements as prescribed by Homeless Management Information Systems (SERVICEPOINT); Data and Technical Standards Final Notice.

Access to Client Records:

The Client Records Access Policy is designed to protect against the recording of information in unauthorized locations or systems. Only staff who work directly with clients or who have administrative responsibilities will receive authorization to look at, enter, or edit client records. Additional privacy protection policies include:

- Except as permitted by State law or regulations, no client records will be shared electronically with another agency without written consent;
- Client has the right to not answer any question unless entry into a service program requires it;
- Client has the right to know who has added to, deleted from, or edited their client record;

End User Ethics:

Any action taken with a specific intent that adversely affects the resources of any participating organization or institution or employees is prohibited. Any action taken with a specific intent that adversely affects any individual is prohibited. Users are prohibited to use CNYS SERVICEPOINT computing resources for personal purposes. Users must not attempt to gain physical or logical access to data or systems for which they are not authorized. Users must not attempt to reverse-engineer commercial software. Users are prohibited to load unauthorized programs or data onto CNYS SERVICEPOINT. Users should scan all computer programs and data for viruses before logging onto CNYS SERVICEPOINT.

Definitions:

- SERVICEPOINT System Administrator(s)- are responsible for the implementation, training and technical assistance and reporting functions and oversight of CNYS SERVICEPOINT, compliance with internet confidentiality and privacy policies
- Participating Agency- is any agency that receives federal funding or state for homeless services or any public service that is in need of performance based outcome measures.
- Agency Executive Director- is responsible for all agency staff that has access to CNYS SERVICEPOINT.
- Agency Administrator- is responsible for the administration of the software for his or her agency.
- End User- is responsible for data input, data security, and data integrity.

Section One: Contractual Requirements and Roles

1.1 CNYS SERVICEPOINT Contract Requirements

Policy: The SERVICEPOINT staff shall provide technical assistance to all Participating Agencies.

The SERVICEPOINT staff is committed to providing quality service to existing and new participating agencies. All existing and new agencies participating in CNYS SERVICEPOINT that are funded through the United States Department of Housing and Urban Development (HUD) and the Emergency Solutions Grant will have user licenses and technical assistance covered under their current contracts. Please note: Participating Agencies are responsible for all costs associated with maintenance, personnel, and internet access. In order to participate in CNYS SERVICEPOINT, all existing and new participating agencies must sign an Agency Participation Agreement.

The CNYS SERVICEPOINT license costs will be covered for agencies funded through the United States Department of Housing and Urban Development (HUD) and the Emergency Solutions Grant, and the licenses costs for non-mandated participants will be covered as budget constraints allow. Non-mandated participants will be required to cover their CNYS SERVICEPOINT licensing costs if CNYS SERVICEPOINT must reallocate the license funds due to budget restraints or the addition of a participating agency that is funded by HUD or ESG.

1.2 CNYS SERVICEPOINT Governing Structure and Management

Policy: The System Administrator @ The Central New York Services shall manage the structure that supports CNYS SERVICEPOINT and make final policy decisions with input from the SERVICEPOINT committee group.

The Central New York Services advises and supports CNYS SERVICEPOINT operations in the following programmatic areas: resource development; consumer involvement; and quality assurance/accountability. The SERVICEPOINT System Administration of CNYS SERVICEPOINT shall be:

- Linda Wilkinson SERVICEPOINT System Administrator, Central New York Services
- Lois Cox, SERVICEPOINT System Administrator, local contractor

The SERVICEPOINT System Administrator is responsible for oversight of all day-to-day operations including: technical infrastructure; planning, scheduling, and meeting project objectives and developing and enforcing the Policies and Procedures.

The CNY Services is responsible for the overall direction and ongoing oversight of the SERVICEPOINT operations and usage of the application Service Point:

- Implementing CNYS SERVICEPOINT to Partnering Agencies
- Providing technical assistance in generating required reports
- Designs and implements training program for all end users
- Provide technical assistance and troubleshooting as needed and generating required reports
- The Provider Agencies will meet at least quarterly and will consist of one agency representative from each of the agencies that are submitting data.
- The Policy and Procedure Manual will be reviewed annually and revisions will be made as required by HUD SERVICEPOINT Standards or changes to the current functioning of CNYS SERVICEPOINT.

1.3 Data Analysis

Policy: The SERVICEPOINT system administrator shall be responsible for Data Analysis.

Data analysis is as follows:

- Providing data quality queries to Participating Agencies on a regular basis
- Providing detailed reports on families and individuals accessing services
- Providing data analysis and reports

1.4 System Administration, Security, and User Accounts:

Policy: System security and integrity shall be reviewed on a regular basis. (Annually min)

THE SERVICEPOINT SYSTEM ADMINISTOR has a contract with Bowman Internet Systems, LLC (Service Point) to host the central server (located in Shreveport, Louisiana). They will have overall responsibility for the security of the

system. The SERVICEPOINT System Administrator will review all network and security logs regularly. All Agency Administrators and Agency staff user accounts are the responsibility of the SERVICEPOINT SYSTEM ADMINISTRATOR staff. The Agency Administrator is responsible for reviewing his or her agencies accounts on a regular basis.

1.5 Agency Executive Director

Policy: The Executive Director of each Participating Agency shall be responsible for all agency staff that has access to CNYS SERVICEPOINT.

The Executive Director of each Participating Agency will be responsible for oversight of all agency staff that generate or have access to client-level data. The Executive Director holds final responsibility for the adherence of his or her agency's personnel to the CNYS SERVICEPOINT Policies and Procedures outlined in this document. The Executive Director is responsible for all activity associated with agency staff access and use of the Service Point data system. The Executive Director shall establish and monitor agency procedures that meet the criteria for access to the Service Point data system, as detailed in the Policies and Procedures outlined in this document. The Executive Director will ensure that the Agency and its staff fully comply with the User Policy Agreement and hereby agrees to fully indemnify and hold harmless CNYS from any unauthorized use, improper use, or misuse of the software and the system by the Agency and/or its staff, or any violation of law arising out of or in connection with the acts or omissions of the Agency and its staff and the Agency's participation in the CNYS SERVICEPOINT reporting process. The Executive Director agrees to limit access to the Service Point software system to staff who work directly with (or supervise staff who work directly with) clients or have data entry responsibilities.

Each Agency must ensure that each user of the software and system obtains a unique user license. Only those with a user license may access and use the software and system. Sharing of usernames and passwords is expressly forbidden. In addition, each user of the software and system must agree to the User Policy Agreement. The Executive Director also oversees the implementation of data security policies and standards.

1.6 Agency Administrator

Policy: Every Participating Agency may designate one person to be the Agency Administrator.

Each Agency must ensure that each user of the software and system obtains a unique user license. Only those with a user license may access and use the software and system. Sharing of usernames and passwords is expressly forbidden. In addition, each user of the software and system must agree the User Policy Agreement. The designated Agency Administrator holds responsibility for the administration of the system software in his or her agency. This person will be responsible for:

- Reviewing with new staff persons on the uses of the Service Point software system including review of the Policies and Procedures in this document and any agency policies which impact the security and integrity of client information
- Ensuring that access to the Service Point system is granted to authorized staff members only after they have received training from a designated trainer.
- Notifying all users in their agency of interruptions in service
- The Agency Administrator is also responsible for implementation of Data Security Policy, including:
 - Administering and monitoring access control
 - Detecting and responding to violations of the Policies and Procedures or agency procedures

1.7 User

Policy: Staff requiring legitimate access to CNYS SERVICEPOINT shall be granted such access.

All individuals at CNYS and at the Participating Agency levels who require legitimate access to the software system will be granted such access. Individuals with specific authorization can access the system software application for the purpose of conducting data management tasks associated with their area of responsibility. The SERVICEPOINT System Administrator agrees to authorize use of the Service Point Software system only to users who need access to the system for technical administration, report writing, data analysis and report generation, back-up administration or other essential activity associated with carrying out CNYS SERVICEPOINT responsibilities.

The Participating Agency agrees to authorize use of the Service Point Software system only to users who need access to the system for data entry, editing of client records, viewing of client records, report writing, administration or other essential activity associated with carrying out participating agency responsibilities.

Users are any persons who use the Service Point software for data processing services. They must be aware of the data's sensitivity and take appropriate measures to prevent unauthorized disclosure.

Users are responsible for protecting institutional information to which they have access and for reporting security violations. Users must comply with the Agency's Data Security Policy as described in the Policies and Procedures. They are accountable for their actions and for any actions undertaken with their username and password.

All Users shall sign a User Policy Agreement prior to obtaining access to CNYS SERVICEPOINT. Only staff who work directly with clients or who have administrative responsibilities can look at, enter, or edit client records.

Section Two: Participation Requirements

2.1 Participation Requirements

Policy: CNYS shall communicate all requirements for participation in SERVICEPOINT.

CNYS will work to ensure that all Participating Agencies receive the benefits of the system while complying with all stated Policies and Procedures.

2.2 System Requirements

Policy: Each computer accessing CNYS SERVICEPOINT shall meet Minimum System Requirements.

- High speed Internet connection greater than 56k/v90 (128 KBPS, DSL, or Cable)
- Computer with one (1) gigahertz Pentium processor (PC or Mac OS x 10.2 or higher)
- Web browser must be at least Microsoft Internet Explorer 8.0 or Mozilla Firefox 4
- Hard drive with at least nine (9) gigabytes and sixty-four (64) megabytes of RAM
- Virus protection with automatic update, Individual or network firewall
- Locking password protected screen saver set for fifteen (15) minutes

2.3 Participation Agreement Requirements

Policy: Each Participating Agency shall comply with Participation Agreement Requirements.

- Identification of Agency Administrator
- The Agency Administrator and designated staff persons must commit to attending all training(s) prior to accessing the system online
- Interagency Data Sharing Agreements must be established between any service programs where sharing of client level information is to take place.
- Release of Information Forms must be signed by all clients to authorize the entering and sharing of their personal information electronically with other Participating Agencies through the Service Point software system.
- Participation Agreements must be signed by Participating Agencies.
- Agencies are required to enter all data elements as defined by the Homeless Management Information Systems (SERVICEPOINT); Data and Technical Standards Notice

2.4 Implementation Requirements

Policy: Each Participating Agency shall comply with Implementation Requirements.

- All Participating Agencies must read and understand all participation requirements and complete all required documentation prior to implementation of the system and all implementation requirements must be complete and on file with THE SERVICEPOINT SYSTEM ADMINISTOR prior to using the system
- **Participating Agreement-** refers to the document agreement made between the participating agency and THE SERVICEPOINT SYSTEM ADMINISTOR for CNYS SERVICEPOINT. This agreement includes commitment to minimal data as defined by Homeless Management Information Systems (SERVICEPOINT); Data and Technical Standards Final Notice. This document is the legally binding document that refers to all laws relating to privacy protections and information sharing of client specific information
- **Timeliness Policy-** Agencies must create an internal mechanism that ensures client level data is entered within 7 days. This policy shall affect the HUD Data Elements. There is a higher standard for the Entry/Exit and Shelter Point Processes.
- **Entry/Exit Policy-** All Participating Agencies shall utilize the Entry/Exit process for every client entered into CNYS SERVICEPOINT. This process is integral to timely and accurate reporting and shall be completed within twenty-four (24) hours of the beginning or ending of an incident of housing.

2.5 Confidentiality and Informed Consent

Policy: Each Participating Agency shall comply with the Confidential and Informed Consent Protocol.

All Participating Agencies agree to abide by all privacy protections, laws, regulations, and standards and agree to uphold all standards of privacy as established by CNYS. Participating Agencies shall develop procedures for providing the Client Fact Sheet to clients about the usage of CNYS SERVICEPOINT. Participating Agencies are also required to use written Release of Information Forms when information is to be entered within CNYS SERVICEPOINT. The Participating Agency should provide an oral explanation of CNYS SERVICEPOINT and the terms of consent. The agency shall post the CNYS SERVICEPOINT Data Privacy Notice within the agency.

Clients will be notified of the following information:

- **What Service Point is,** a web based information system that homeless and public service agencies across the state use to capture information about the persons they serve
- **Why the agency uses it,** to understand their clients' needs and help the programs plan to have appropriate resources for the people they serve, and to inform public policy
- **Who Has Access-** Only staff who work directly with clients or who have administrative responsibilities can look at, enter, or edit client records
- No information will be released to another agency without written consent
- **Right of Refusal-** Client has the right to not answer any question, unless entry into a program requires it; Client has the right to know who has added to, deleted, or edited their Service Point record; Information that is transferred over the web is through a secure, encrypted connection
- Each Client whose record is being shared electronically through CNYS SERVICEPOINT must agree via written Client Consent Form to have their data shared. A client must be informed what information is being shared and with whom it is being shared. The Participating Agency agrees not to release client identifiable information to any other organization pursuant to federal and state law without proper client consent.

- The Participating Agency will uphold Federal and State Confidentiality regulations to protect client records and privacy. In addition, the Participating Agency will only release client records with written consent by the client
- The Participating Agency will abide specifically by the Federal confidentiality rules as contained in 42 CFR Part 2 regarding disclosure of alcohol and/or drug abuse records. In general terms, the Federal rules prohibit the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted. A general authorization for the release of medical or other information is not sufficient for this purpose. The Participating Agency understands that the Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.
- The Participating Agency will not solicit or input information from clients unless it is essential to meet data requirements, provide services, or conduct evaluations or research

2.6 Minimum Data Elements

Policy: Each Participating Agencies shall input required Data Elements.

Participating Agencies that collect client data through CNYS SERVICEPOINT will collect all data contained within the Data Elements as prescribed by Notice of Homeless Management Information Systems (SERVICEPOINT): Data and Technical Standards Final Notice. The data elements will ensure that agencies are collecting and inputting quality data. The Participating Agency is responsible for ensuring that all clients are asked a standardized set of questions for use in aggregate analysis.

2.7 Program Specific Data Elements

Policy: Each Participating Agency shall input Program Specific Data Elements.

Participating Agencies that receive funding from HUD through the Supportive Housing Program (SHP), Shelter Plus Care program, Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings program, and The Housing for Persons with AIDS program (HOPWA), Veteran Homeless Prevention Programs must collect client data through CNYS SERVICEPOINT. The data that these Participating Agencies are required to capture are the required Data Elements and the as prescribed by Notice of Homeless Management Information Systems (SERVICEPOINT): Data and Technical Standards. The Program Specific Data Elements are required by the HUD Annual Progress Report (APR).

2.8 Data Security Policy

Policy: Participating Agencies must develop and have in place minimum information security protocols.

Information Security Protocols or procedures will protect the confidentiality of the data and to ensure its integrity at the site, as well as, the confidentiality of the clients. At a minimum, a Participating Agency must develop rules, protocols or procedures to address each of the following:

- Unattended workstations
- Physical access to workstations
- Policy on user account sharing
- Client record disclosure
- Report generation, disclosure and storage

2.9 Implementation Connectivity

Policy: Each Participating Agency is required to obtain an adequate Internet connection.

An adequate internet connection is defined as 56K/v90 or greater, preferably 128 KBPS, DSL, or Cable. Proper Connectivity ensures proper response time and efficient system operation of CNYS SERVICEPOINT.

2.10 Maintenance of Onsite Computer Equipment

Policy: Each Participating Agency shall maintain on-site computer equipment.

Participating Agencies will be responsible for the maintenance on-site computer equipment and data used for participation in CNYS SERVICEPOINT including the following:

- ❖ The Participating Agency is responsible for maintenance of on-site computer equipment. This includes purchase of and upgrades to all existing and new computer equipment for the utilization of CNYS SERVICEPOINT. As a requirement of CNYS SERVICEPOINT, each agency shall install:
 - virus protection software (with automatic updates) on all computers
 - a network or workstation firewall on all computers
 - a password protected screensaver on all computers, set for 15 minutes and
 - dispose of documents that contains identifiable client level data by shredding paper records.

Section Three: Training

3.1 Training Schedule

Policy: The SERVICEPOINT System Administrator shall maintain a CNYS SERVICEPOINT training schedule.

The SERVICEPOINT System Administrator staff will maintain an ongoing training schedule for Participating Agencies. The SERVICEPOINT System Administrator will publish a schedule for training and will offer them regularly. Agencies are asked to submit a written request for all training. There are two basic training curricula, Agency Administrator training and User training. The appropriate access level shall obtain the appropriate training. Agency Administrators are required to obtain both trainings.

3.2 User, Administrator, and Security Training

Policy: Each CNYS SERVICEPOINT User must attend appropriate trainings.

All users must undergo security training before gaining access to the system.

- This training must include a review of CNYS SERVICEPOINT Policies and Procedures.
- THE SERVICEPOINT SYSTEM ADMINISTOR will provide data security training to ensure that staff is properly trained and knowledgeable of CNYS SERVICEPOINT Policies and Procedures.
- User, regardless of level, must attend User Training.
- Agency Administrators must also attend an Administrator training in addition to User training.

CNYS is responsible for training all new users. Users must receive Service Point training prior to being authorized user privileges for the system.

Section Four: User, Location, Physical and Data Access

4.1 Access Privileges to CNYS SERVICEPOINT

Policy: Each Participating Agency shall adhere to standard procedures in requesting and obtaining system access.

Participating Agencies will apply the user access privilege conventions set forth in this procedure. Allocation of user access accounts and privileges will be made according to the format specified in this procedure:

- User access and user access levels will be determined by the System Administrator. The System Administrator will generate username and passwords within the administrative function of Service Point
- The SERVICEPOINT System Administrator will create all usernames using the First Initial of First Name and Last Name format. If a conflict exists beyond this naming convention, the SERVICEPOINT System Administrator will deal with it on a case by case basis
- Passwords are automatically generated from the system when a user is created. The SERVICEPOINT System Administrator will securely communicate the system-generated password to the user.
 - The password and username will never be communicated in a non-secured format
- The user will be required to change the password the first time they log onto the system. **The password must be between 8 and 16 characters and contain 2 numbers**
- **Passwords expire every 45 days**

The Agency Administrator shall terminate the rights of a user (by inactivating the user) immediately upon termination from their current position. If a staff person is to go on leave for a period of longer than forty-five (45) days, their password should be inactivated within five (5) business days of the start of their leave. The Agency Administrator is responsible for inactivating users from the system and informing CNYS. The Agency Administrator must update the access list and signed agreement on a quarterly basis

- All new users must be submitted to CNYS before they can gain access to the system.
- All users that leave must be inactivated in the system within one (1) business day.
- CNYS shall have the only access to delete users

4.2 Access Levels for System Users

Policy: Appropriate access levels shall be assigned to each CNYS SERVICEPOINT user.

Participating Agencies will manage the proper designation of user accounts and will monitor account usage. The SERVICEPOINT System Administrator agrees to apply the proper designation of user accounts and the Agency Administrator agrees to manage the use of these accounts by agency staff. User accounts will be created by the System Administrator and deleted by the Agency Administrator under authorization of the Participating Agency's Executive Director.

CNYS SERVICEPOINT currently utilizes three (3) access levels, the access levels are as follows:

- Case Manager II
- Case Manager III
- Agency Administrator

4.3 Access to Client Paper Records

Policy: Participating Agencies shall establish procedures to handle access to client paper records.

These procedures will:

- Identify which staff has access to the client paper records and for what purpose. Staff should only have access to records of clients, which they directly work with or for data entry purposes
- Identify how and where client paper records are stored
- Develop policies regarding length of storage and disposal procedure of paper records
- Develop policies on disclosure of information contained in client paper records

4.4 Unique Username and Password

Policy: Authorized users shall be granted a unique username and password.

Only authorized users will be granted a Username and Password to ensure that only authorized users will be able to enter, modify, or read data.

- Each user will be required to enter a Username with a Password in order to logon to the system
- Username and Password are to be assigned to individuals
- The SERVICEPOINT System Administrator will create all usernames using the First Initial of First Name and Last Name format. For example, John Doe's username would be jdoe. In the case where there are two people with the same first initial and last name, the user's middle initial should be placed between the initial of the first name and the last name. For example, John A. Doe and Jane L. Doe would be jadoe, jldoe. If a conflict exists beyond this naming convention, the SERVICEPOINT Project Coordinator will deal with it on a case by case basis
- The Password must be no less than eight (8) and no more than sixteen (16) characters in length and must be alphanumeric (letters and a minimum of two (2) numbers)
- The first or reset password will be automatically generated by Service Point and will be issued to the User by the System
 - Administrator. The first time and temporary (reset) password will be welcome123. The SERVICEPOINT System Administrator are available to agency staff to reset passwords, but an Agency Administrator can also reset a password
- Forced Password Change will occur every forty-five (45) days once a user account is issued. Passwords will expire and users will be prompted to enter a new password. Users may not use the same password consecutively, but may use the same password more than once
- Unsuccessful Logon- If a User unsuccessfully attempts to logon three (3) times, the Username will be "locked out", access permission revoked and unable to gain access until their password is reset in the manner stated above. Passwords are the individual's responsibility, and users cannot share passwords

4.5 Right to Deny User and Agency Access

Policy: Violations of the Policies and Procedures shall result in denial to CNYS SERVICEPOINT.

Any Participating Agency or User access may be suspended or revoked for suspected or actual violation of the Policies and Procedures. Any violation by users of the system may result in the suspension or revocation of an agency's access.

The suspension or revocation process is as follows:

- All potential violations of any Policies and Procedures will be investigated
- Any user found to be in violation of Policies and Procedures will be sanctioned accordingly, or sanctions may include but are not limited to; a formal letter of reprimand, suspension of system privileges, revocation of system privileges, termination of employment and criminal prosecution
- Any agency that is found to have consistently and or flagrantly violated Policies and Procedures may have their access privileges suspended or revoked
- All sanctions are imposed at the sole discretion of the CNY Services, Inc.

4.6 Data Access Control

Policy: Participating Agencies and The SERVICEPOINT System Administrator shall monitor access to system software.

Provider Agency Administrators and the SERVICEPOINT System Administrator will:

- regularly to review user access privileges and remove identification codes and passwords from their systems when users no longer require access,
- implement discretionary access controls to limit access to CNYS SERVICEPOINT information when available and technically feasible,
- and audit all unauthorized accesses and attempts to access CNYS SERVICEPOINT information.

4.7 Auditing: Monitoring and Violations

Policy: The SERVICEPOINT System Administrator will monitor access to all systems that could potentially reveal a violation of information security protocols.

Monitoring shall occur as follows:

- Monitoring compliance is the responsibility of the SERVICEPOINT System Administrator
- All users are obligated to report suspected instances of noncompliance
- Monitoring shall occur yearly and focus on CNYS SERVICEPOINT usage and adherence to the CNYS SERVICEPOINT Policies and Procedures.

Violations are as follows:

- The SERVICEPOINT System Administrator will review standards violations and require or recommend the agency through corrective and disciplinary actions
- Users should report security violations to the Agency Administrator, and the Agency Administrator will report to the SERVICEPOINT System Administrator
- Should there be a violation by the Agency Administrator, end users may report directly to the SERVICEPOINT System Administrator

Section Five: Technical Support and System Availability

5.1 Planned Technical Support

Policy: The SERVICEPOINT System Administrator shall offer technical support to all Participating Agencies on use of CNYS SERVICEPOINT.

The SERVICEPOINT System Administrator will assist agencies in:

- Start-up and implementation
- On-going technical assistance
- Training
- Technical assistance with report writing

5.2 Participating Agency Service Request

Policy: The SERVICEPOINT System Administrator shall respond to requests for services.

All service requests will arrive from the Agency Administrator. CNYS will respond to service requests, however, The SERVICEPOINT System Administrator will require that proper communication channels (phone, fax, or e-mail) be established and used at all times. To initiate a service request from a Participating Agency:

- Agency User contact the SERVICEPOINT System Administrator for service
- The SERVICEPOINT System Administrator will determine resources needed for service
- The SERVICEPOINT System Administrator will be available to the community of users in a manner consistent with the user's reasonable service request requirements.
- The SERVICEPOINT System Administrator are available for Technical Assistance, questions, and troubleshooting generally between the hours of 8:30 a.m. to 4:30 p.m. Monday through Friday, excluding state and federal holidays. 315.765.0732

5.3 Hours of System Operation

Policy: System shall be accessible 24 hours a day 7 days a week.

The system will be available to the community of users in a manner consistent with the user's reasonable usage requirements. CNYS SERVICEPOINT has regularly scheduled maintenance; Wednesday's 8:00pm to 9:00pm CNYS SERVICEPOINT will be inaccessible during that time.

5.4 Planned Interruption to Service

Policy: The SERVICEPOINT System Administrator shall inform Participating Agencies of any planned interruption to service.

Section Six: Data Release Protocols

6.1 Data Release Authorization and Distribution

Policy: The Clients own all data input into the system by Participating Agencies.

The Participating Agency will follow CNYS SERVICEPOINT procedures for the release of all data. Participating Agencies will abide by Access to Data Policies as established by this document. Agencies shall only use data for internal use and for required reporting to funders. Any data released will conform to the following:

- Only de-identified aggregate data (that is data devoid of Names, Social Security Numbers, and Dates of Birth) will be released, unless required by government funding sources. (i.e. OTDA)
- Client Level Personal Protected Information (Names, Social Security Numbers, and Dates of Birth) and whereabouts will only be released if it is required by state or local law; necessary to avert serious threat to health or safety; to report victims of abuse or neglect; and for law enforcement purposes only in response to a lawful court order, court ordered warrant, subpoena or summons issued by a judicial office or a grand jury subpoena

6.2 Client Audit and Deletion Request

Policy: The Client has the right to request an audit log of what user(s) has viewed, edited, or deleted information and the right to remove their personal information at any time.

The client shall make a Client Audit and Deletion Request in writing. The client can also request that their client record and all personal identifying information be removed from CNYS SERVICEPOINT with the Client Audit and Deletion Request).

6.3 Right to Deny Access to Client Identifying Information

Policy: The SERVICEPOINT System Administrator retains authority to deny access to all clients identifying information contained within the system.

No data will be released to any person, agency, or organization that is not the owner of said data. The procedure is as follows: Any request for client identifying data from any person, agency, or organization other than the owner will be forwarded to the SERVICEPOINT System Administrator, to determine whether a release is appropriate.

Section Seven: Data Quality Controls

7.1 Client Naming Convention

Policy: Users shall use the following naming conventions for the input of all clients.

Client Naming Standard includes:

- Input the first name in the first name field and the last name in the last name field. Be certain that the correct name is in the correct field
- Client names must be entered in Title Case, not in all caps or all lower case.
- The suffix field shall only contain suffixes such as Jr., Sr., III, IV, V, etc. The suffix field shall not contain prefixes (Miss, Ms., Mrs., and Mr.) or suffixes not in the aforementioned format
- Clients with more than one last name shall be hyphenated.
- The use of non-identifying first or last names shall not be permitted. This standard does not allow for clients to be named Child, Wife, Husband, or Unknown.

Entry & Exit

7.2 Entry - Services

- Services start dates equal to entry into program; exit date equals last date of services.
- Consecutive month Start and End dates should never overlap
- Case Management must start at Entry and end at Program Exit thus cannot precede Intake date.

Rental Assistance

Arrears/One-time Payment

- Arrears should be a single lump sum payment, with start and end dates the same; those dates being approval date
- If the property owner includes the current month in with arrears, dates should reflect the arrears situation (lump sum with start/end dates same as approval date).

Pay Forward/Ongoing Payment

- Start date is the first day of the month for which rental assistance applies and the end date is the last day of the last month for which rental assistance applies, even if the amount is "pro-rated."
- Lease schedule starting other than the first of the month Lease starts on 01/15/10: Start 01/15/10; End 02/14/10
- Separate entries must exist for each month of Rental Assistance with associated monthly payments

Security Deposit/One-time Payment

- One-time payments are same start and end dates with both dates equaling approval date.

Utility Deposit/One-time Payment

- One-time payments are same start and end dates with both dates equaling approval date

Utility Payments

- Arrears/One-time Payment
- Arrears should be a single lump sum payment, with start and end dates the same; those dates being approval date
- Pay Forward: No utility pay forward permitted

Moving Cost Assistance/One-time Payment

- One-time payments are same start and end date with both dates equaling approval date.

Motel & Hotel Vouchers

- Maximum voucher nights = 30 and No Arrears are permitted
- Current payment
Enter one record with start date equaling first night for which the voucher applies; end date equals last night voucher applies.
- Break in service for even one night requires new start/end dates.

Other

- Financial records must be distinct. Amounts and services must be recorded individually.
- Corrections should be both approved by worker's supervisor and notification made to SERVICEPOINT worker

Exit

- In that Case Management covers intake to last service coverage, Program Exit Date = last date of CM
- Please Exit cases as soon as service end date has been established.

Data Quality Plan

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3.0

1.1 Purpose

The purpose of this Data Quality Standard is to standardize expectations and provide guidance to SERVICEPOINT participating programs on the extent and quality of data entered into CNYS Management Information System (SERVICEPOINT).

1.2 Definition of Data Quality

SERVICEPOINT data quality refers to the extent that data recorded in the CNY SERVICEPOINT accurately reflects the same information in the real world. A perfect overlap between data and reality would result in a hypothetical data quality rating of 100%, while a data quality rating of 0% would indicate that there is no match between the information entered into an SERVICEPOINT and the same information in the real world. No data collection system has a quality rating of 100%. However, to meet the into Central New York Services' goal of presenting accurate and consistent information on homelessness, it is critical that the SERVICEPOINT have the best possible representation of reality as it relates to homeless people and the programs that serve them. Specifically, the goal is to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent of homelessness and the impact of homeless services.

1.3 Homeless Management Information System (SERVICEPOINT)

For the purposes of this document, the Homeless Management Information System (SERVICEPOINT) means Bowman Systems and Service Point software application and all modules, assessments, reporting capacities, standard or customized, contained therein.

1.4 Definitions

- Client Record: A client record in the Central New York Services SERVICEPOINT is a compilation of data elements sufficient to meet the requirements of funding sources while acknowledging the feasibility limitations of data collection for some program types. The following are definitions of "client record" as applicable to program types:
- Outreach programs: For the purposes of outreach programs, the definition of a record is a compilation of data elements sufficient to document that a service transaction as occurred. For outreach programs, this can be anonymous provided a service transaction is attached.
- Emergency Shelters: Any facility the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless
- Transitional Housing Programs: A project that has its purpose facilitating the movement of homelessness individuals and families to permanent housing within a reasonable amount of time (usually 24 months).
- Permanent Housing Programs: is long-term, community-based housing that has supportive services for homeless individuals with disabilities.

Data Quality Standards

The Data Quality Standard for Central New York Services is split into categories. The general standard outlined is applicable to all SERVICEPOINT participating programs with following exceptions noted by specific program type. Unless otherwise noted, all participating programs, including those transferring data from legacy and supporting systems, are expected to achieve and maintain the general standard.

Purpose	General Standard	Exceptions
<p>2.1 Timeliness The purpose of timeliness is to ensure access to data when it is needed – either pro-actively (for monitoring purposes, publishing information to increase awareness, or to meet reporting requirements) or reactively (in response to a request for information or to respond to inaccurate information).</p>	<p>All SERVICEPOINT participating programs will ensure entry of data for new clients, services, and entry/exits are completed within in one week (7 calendar days) of program entry/exit/service etc.</p>	<p>Emergency Shelters: All SERVICEPOINT Emergency Shelter participating programs will ensure daily entry of data for new clients, services, and entry/exits.</p>
<p>2.2 Completeness The purpose of completeness is to ensure sufficient data on clients, their demographic characteristics, and service use to facilitate confident reporting and analysis on the extent and characteristics of the homelessness including: Unduplicated counts of clients served at the local level Patterns of use of people entering and exiting the homeless assistance system Evaluation of the effectiveness of homeless systems</p>		
<p>2.2.1 All Clients Served The purpose of all clients served is to ensure that all clients that are being served by service providers within the Central New York Services SERVICEPOINT system are represented.</p>	<p>100% complete the first section of the profile</p>	<p>Outreach Programs: Outreach programs are allowed to use the anonymous function of the SERVICEPOINT in lieu of client identifiable information. Outreach programs are allowed up to 10% of their client records to be identified as anonymous.</p>

	Purpose	General Standard	Exceptions
2.2.2	<p>Universal Data Elements The purpose of the Universal Data Elements is to ensure that all homeless service providers in the Central New York Services SERVICEPOINT are documenting the data elements necessary to produce unduplicated count of clients served, to provide accurate counts for various reporting requirements, including HUD Annual Progress Report and Annual Homeless Assessment Report requirements, and to ensure that the CNYS SERVICEPOINT has sufficient client data to conduct basic analysis on the extent and characteristics of the populations they serve.</p>	<p>95% of all clients entered will have Universal Data Elements Complete</p>	None
2.2.3	<p>Program Specific Data Elements The purpose of the Program Specific Data Elements is to ensure that all Central New York Services SERVICEPOINT' McKinney Vento recipients are documenting the data elements necessary to produce the Supportive Housing Program Annual Progress Report and to ensure that CNYS SERVICEPOINT has sufficient client data to conduct analysis on the extent and characteristics of the populations they serve.</p>	<p>85% of all clients will have program specific data entered</p>	None
2.2.4	<p>Other Programs</p>	<p>95% of all clients entered will have Universal Data Elements Complete 85% of all clients will have program specific data entered (Entry/Exit minimum)</p>	None
2.3	<p>Accuracy The purpose of accuracy is to ensure that the data housed in the Mohawk Valley CoC SERVICEPOINT is the best possible representation of reality as it relates to homeless people and the programs that serve them.</p>	<p>Provider Agencies are responsible to report to the System Administrator any discrepancies in the data not correctable by their users.</p>	None

Purpose	General Standard	Exceptions
<p>2.4 Consistency The purpose of consistency is to ensure a common interpretation of questions, answers, and which fields need completion in the CNYS Homeless Management Information System (SERVICEPOINT).</p>	<p>All agencies will use the same tool for training staff, developed by the data administrators</p>	<p>None</p>
<p>2.5 Monitoring The purpose of monitoring is to ensure that the standards on the extent and quality of data entered into the CNYS Homeless Management Information System (SERVICEPOINT) so that data quality issues are quickly identified and resolved.</p>	<p>Provider Agencies will be responsible to complete a quarterly monitoring report and submit to the System Administrator.</p>	<p>None</p>
<p>2.6 Agreement The purpose of agreement is to ensure that all participants in the CNYS Homeless Management Information System (SERVICEPOINT) are aware and have agreed to the Data Quality Standards.</p>	<p>All providers agree to meet the above stated standards to the best of their ability and seek assistance when necessary for interpretation or support to improve data quality.</p>	<p>None</p>
<p>3.0 Data Quality Standards Reports</p>	<p>UDE completeness report (ART) Completeness Report Card APR Reports</p>	

User Policy & Responsibilities and Code of Ethics

USER POLICY

Agency User recognizes the primary focus in the design and management of the CNYS SERVICEPOINT is to address the needs of the clients. This includes both the need to continually improve the quality of homeless and housing services, and the need to vigilantly maintain client confidentiality by treating personal data with respect and care.

As the guardians entrusted with this personal data, CNYS SERVICEPOINT users have a moral and a legal obligation to ensure that appropriate methods are practiced with the collection, access, and utilization of data. Each user is responsible to make sure that client data is only used for the purpose for which it is collected. Proper user training, adherence to the CNYS SERVICEPOINT Policies & Procedures Manual, and a clear understanding of client confidentiality are vital to achieving these goals. It is a Client's decision about whether or not to participate in the CNYS SERVICEPOINT study, and which information, if any, shall be shared with other Partner Agencies. The Client must give consent to participate in the CNYS SERVICEPOINT study, through the method chosen by your agency. However, the agency will still need to collect information on the client in order to provide services, run its operations, and report to its funders.

Relevant points regarding client confidentiality include:

- A client must consent to participate in the CNYS SERVICEPOINT study using your agency's policies regarding client consent, privacy, and confidentiality
- Client consent may be revoked by that client at any time through a written notice
- No client may be denied services for failure to provide consent for SERVICEPOINT study
- Clients have a right to inspect, copy, and request changes in their SERVICEPOINT records
- SERVICEPOINT Users may not share client data from the CNYS SERVICEPOINT with individuals or agencies without first obtaining permission from that client
- SERVICEPOINT Users will maintain SERVICEPOINT data in such a way as to protect against revealing the identity of clients to unauthorized agencies, individuals or entities in accordance with the CNYS SERVICEPOINT Policies & Procedures manual
- Any SERVICEPOINT User found to be in violation of the CNYS SERVICEPOINT Policies & Procedures, or the points of client confidentiality in this User Agreement, may be denied access to the SERVICEPOINT, face agency discipline, or criminal prosecution

Minimum data entry on each consenting Client will be the completion of the necessary data fields as required by your agency, which may include the Universal Data Standards, agency required, Program-Specific Data Standards, and the data necessary for minimum community reporting.

The CNYS SERVICEPOINT application is a tool to assist agencies in focusing services, reporting, and locating alternative resources and to help homeless persons. Therefore, agency staff should use the Client information in the CNYS SERVICEPOINT to target services to the Client's needs.

USER RESPONSIBILITY

Your Username and Password give you access to the CNYS SERVICEPOINT. **Initial each item** below to indicate your understanding and acceptance of the proper use of your Username and Password. Failure to uphold the confidentiality standards set forth below is grounds for immediate termination from the CNYS SERVICEPOINT application.

_____ My User ID and Password are for my use only and must not be shared with anyone.

_____ I must take all reasonable means to keep my Password physically secure.

_____ I understand that the only individuals who can view information in the CNYS SERVICEPOINT are authorized users, system administrators, and the Clients to whom the information pertains.

_____ I may only view, obtain, disclose, or use the database information that is necessary to perform my job.

_____ If I am logged into the CNYS SERVICEPOINT and must leave the work area where the computer is located; I **must log-off** of the CNYS SERVICEPOINT before leaving the work area.

_____ A computer that has the CNYS SERVICEPOINT “open and running” shall never be left unattended.

_____ Failure to log off the CNYS SERVICEPOINT appropriately may result in a breach in client confidentiality and system security.

_____ All hard copies of CNYS SERVICEPOINT information must be kept in a secure file.

_____ When hard copies of CNYS SERVICEPOINT information are no longer needed, they must be properly destroyed to maintain confidentiality.

_____ If I notice or suspect a security breach, I must immediately notify the Agency Administrator for the CNYS SERVICEPOINT or the System Administrator (CNYS).

_____ I will maintain the confidentiality of client data in the SERVICEPOINT as outlined above and in the CNYS SERVICEPOINT Policies and Procedures Manual.

_____ I have received training in how to use the CNYS SERVICEPOINT.

_____ I have read and will abide by all policies and procedures in the CNYS SERVICEPOINT Policies & Procedures Manual.

USER CODE OF ETHICS

- ❖ CNYS SERVICEPOINT Users must obtain informed consent with respect, fairness and good faith for both clients and the CNYS SERVICEPOINT study.
- ❖ Each CNYS SERVICEPOINT User should maintain high standards of professional conduct in their capacity as a User.
- ❖ The CNYS SERVICEPOINT User has primary responsibility for his/her Client(s).
- ❖ CNYS SERVICEPOINT Users have the responsibility to relate to the Clients of other Partner Agencies with full professional consideration.

I understand and agree to comply with all the statements listed above.

_____ CNYS SERVICEPOINT User (Print Name & Signature)

_____ Date