



# Homeless Services Department

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## HMIS POLICIES & PROCEDURES for MULTNOMAH COUNTY

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*Updated June '26*

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## 1. Introduction

The Homeless Management Information System (HMIS) was developed to meet data collection requirements made by the United States Congress and the Department of Housing and Urban Development (HUD). Congress passed this requirement in order to get a more accurate count of individuals who are unhoused and to identify the need for and use of different services by those individuals and families.

In addition to collecting information to provide to HUD and comply with law, we use HMIS to provide and coordinate services you provide and to carry out administrative functions related to those services, such as payment or reimbursement for services. We also produce summary statistical information on those who use our services and report this information through various means.

Multnomah, Clackamas, and Washington counties (referred to herein as “Parties”) currently use WellSky’s Community Services software (HMIS), formerly known as “ServicePoint”, as the information system to support the region’s Continuums of Care (CoCs) HMIS instance.

## 2. Implementation-Level Administrative Entities

**Department of County Assets (DCA)** – Multnomah County’s DCA operates, supports and acts as custodian of the data in the HMIS Live Site, supports the Comp Site and houses the Primary System Administrator role.

**Youth & Family Services (YFS)** – Multnomah County’s YFS, a division of the Department of County Human Services, operates, supports and acts as custodian of the data in the Comp Site and houses the Comp Site System Administrator role.

**Regional HMIS Council (RHC)** – RHC is responsible for the overall vision, strategic direction and governance of the HMIS (including both the Live Site and Comp Site). The purposes of this group are to:

- Represent the collective interests of participating CoCs
- Set strategic priorities
- Ensure resourcing of the system
- Review and approve implementation-wide decisions, including policies and procedures, as needed
- Oversee and act as the point of escalation for the Technical Change Control Board

The charter for the RHC is attached to this document. Please consult the charter and Section 6(a) of the HMIS IGA between Multnomah and your own county for more information on the RHC.

**Technical Change Control Board (TCCB)** – The purposes of TCCB are to:

- Implement, review & propose changes to implementation-wide policies & procedures
- Enforce change control
- Identify, discuss and navigate implementation-wide issues
- Select, curate and escalate issues to RHC
- Prioritize and select shared system monitoring and evaluation activities
- Ensure compliance to privacy, security and confidentiality protocols
- Develop, implement and monitor best practices for system, training and technical assistance and reporting

The charter for the TCCB is attached to this document. Please consult the charter and Section 6(b) of the HMIS IGA between Multnomah and your own County for more information on the TCCB.

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### 3. Scope

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1. This document applies to all persons and organizations using HMIS in Multnomah County. These policies should be followed at all times, in addition to those identified in all HMIS Administrative Documents, specified below.

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### 4. Governing Principles

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- 1 All aspects of the use and management of HMIS will be informed by a racial equity lens, the pursuit of anti-racist systems and practices and the recognition of the ways in which data, data systems and their associated infrastructure can impact racism and racialized inequities among unhoused populations. The HMIS-participating, Tri-County CoCs are collaborative partners working together for the betterment of the communities they serve, in pursuit of a more just society and the goal of making homelessness rare, brief, and one-time. The Parties agree that a shared, coordinated, centralized HMIS is essential to the success of those goals.
- 2 All persons using HMIS are expected to read, understand, and adhere to any current, applicable manuals, rules, policies and procedures, guides and tools, even when the materials do not provide specific guidance.
- 3 All information entered into HMIS by service providers, their respective staff and End Users are bound by all applicable federal, state and local confidentiality regulations and laws that protect the Service Recipient, according to the organization's requirements, in accordance with the Agency HMIS Participation Agreement.
- 4 All End Users are expected to read, understand, and adhere to the local Privacy & Security Notice. This document identifies and describes allowable data uses and

disclosures, as well as Service Recipient privileges and rights in relation to those uses and disclosures and the data within HMIS.

- 5 Service Recipient data is the most valuable and sensitive asset of HMIS. These policies will ensure integrity of the data to the greatest extent possible and protect this asset from accidental or intentional unauthorized modification, destruction, uses or disclosures.
- 6 The availability of a centralized data repository, as provided by HMIS, is necessary to optimize the achievement of care coordination and system/community wide aggregation of unduplicated statistics.
- 7 The Primary System Administrator, in collaboration with HMIS Lead Agencies, is responsible for ensuring the broadest deployment and availability for participating service providers.
- 8 Violation of the policies and procedures set forth in this document may include but are not limited to temporary or permanent suspension of your HMIS access, loss of employment and/or legal action.

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## 5. Definitions

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- **Agency Administrator** – An End User working within a Participating Agency that holds special administrative responsibilities with regard to the agency’s use of HMIS. These special responsibilities are specified in the Roles & Responsibilities section below.
- **Agency Data Contact** – An End User working within a Participating Agency that acts as the primary liaison between their agency and the CoC’s HMIS Lead Agency with respect to HMIS-related work and issues. If an End User is not available to be the Data Contact, a non-End User may be designated. See the Roles & Responsibilities section for more information.
- **Agency HMIS Participation Agreement** – See Section 7: Administrative Documents.
- **CoC Lead** – The entity responsible for the leadership and implementation of CoC system operations, planning, governance, designating an HMIS Lead Agency and designing a coordinated assessment system. CoC Leads operate at the County level.
- **Comp Site** – A database that is comparable to the Live Site but maintained as a separate site and that is used exclusively by victim service providers (VSP). The Comp Site to be used by the Parties is an instance of HMIS. Unlike the Live Site, the Comp Site is subject to the regulations of the federal Violence Against Women Act (VAWA).
- **Comp Site System Administrator** – The person or people that are responsible for the overall success of the Comp Site implementation, for coordinating with and

supporting VSPs and for the other activities described in the Roles & Responsibilities section below.

- **Continuum of Care (CoC)** – This term has multiple meanings and is defined here only to clarify the definition of “HMIS Lead” below. Within the context of that definition, a Continuum of Care consists of one or more communities that collectively make up a given homeless service system. Three CoCs, Clackamas County (OR-507), Multnomah County (OR-501), and Washington County (OR-506), participate in two implementations – one for the Live Site and one for the Comp Site.
- **County System Administrator** – The person within a county’s HMIS Lead Agency who is responsible for the overall success of their county’s portion of the HMIS implementation, for coordinating with the Primary System Administrator, and for HMIS Lead Agency activities as described below in the Roles & Responsibilities section.
- **HMIS Administrative Documents** – Documents that Participating Agencies must complete and/or use in order to comply with this document. See Section 7: Administrative Documents for a list and descriptions of these documents.
- **HMIS Data** – Any personally identifying or de-identified Service Recipient data or associated metadata stored within or exported from HMIS.
- **Data Quality (DQ) Plan** – A CoC-specific, community-wide plan to monitor and improve data quality for a given year. HMIS Leads are responsible for developing, implementing and updating DQ Plans. DQ Plans must be updated on an annual basis.
- **End User** – Anyone who accesses and uses HMIS.
- **End User License Agreement (EULA)** – See Section 7: Administrative Documents.
- **HMIS Lead Agency** – The recipient of the HMIS Grant, as designated by the CoC Lead. The primary entity responsible for managing HMIS on behalf of a given Continuum of Care and providing HMIS-related technical assistance to that Continuum of Care. The HMIS Lead in Multnomah County is Multnomah County’s Homeless Services Department (HSD). For more information, see Roles & Responsibilities section for HMIS Leads below.
- **Live Site** – The primary HMIS instance that is used by all homeless services agencies or programs that are not designated victim service providers (VSP).
- **Participating Agency** – Any organization that accesses and uses HMIS. If a County’s HMIS Lead deems it appropriate, a specific department, division or work unit may be considered an organization and, therefore, a participating agency. Participating Agencies are referred to as “covered homeless organizations” (CHOs) in the 2004 HUD Data & Technical Standards.
- **Primary System Administrator** – The person or people responsible for the overall success of the Live Site implementation, for coordinating with and supporting County System Administrators, HMIS Lead Agencies and Comp Site Administrators, as needed, and for the other activities described in the Roles & Responsibilities section below.
- **Privacy & Security Notice** – See Section 7: Administrative Documents.

- **Release of Information (ROI) form** – See Section 7: Administrative Documents.
  - **SAP Business Objects (SAP BO)** – The primary, integrated reporting and report development platform in HMIS.
  - **Service Recipient** – An individual receiving services from a Service Provider Agency and whose data is stored in HMIS.
- 1 **For current HMIS Guides and Tools** – including but not limited to the HMIS Data Standards Manual, HMIS Data Dictionary and 2004 HMIS Data and Technical Standards Final Notice – visit <https://www.hudexchange.info/hmis/guides/>.
  - 2 Refer to funder or program documentation for terms used by those funders or programs.

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## 6. Equipment, Materials and Supplies

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- 1 Participating agencies are responsible for providing their own technical support for all hardware and software systems used to access HMIS.
- 2 All participating agencies must support minimum hardware and software requirements for workstations. Contact your local HMIS Lead Agency for more information, as needed.
- 3 Participating agencies may keep digitized versions of paper forms for record retention. Digitized forms must be accessible, migratable and high quality (minimum 300 dots per inch) scans that accurately retain all details of the original document. Original paper forms that have been digitized must be shredded to protect participant privacy.

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## 7. Administrative Documents

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- 1 **HMIS Agency Participation Agreement (APA)** – Stipulates the conditions under which a signing agency, department or division agrees to participate in HMIS and/or gain access to HMIS data.
- 2 **Interagency HMIS Data Sharing Specifications** – Enables the signing agency to specify which data will be shared with other HMIS participating agencies.
- 3 **HMIS End User License Agreement (EULA)** – Stipulates the conditions under which a signing End User agrees to participate in HMIS.
- 4 **HMIS Privacy & Security Notice** – Stipulates allowable uses and disclosures of HMIS data for all end users and participating entities.
- 5 **Releases of Information (ROI)** – Authorizations, whether verbal or written, that are provided by Service Recipients that allow Participating Agencies to disclose data to

other agencies, where such disclosures are not already allowed by the community's Privacy Notice or applicable law.

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## 8. Privacy, Confidentiality & Security

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- 1 In general, system user roles and permissions will be selected to enable End Users to access the minimum data and system functionality necessary to successfully accomplish business operations that are relevant to their jobs. Additional access beyond the “minimum access necessary” may be granted in order to reduce the administrative burden associated with the various complexities of HMIS data visibility.
- 2 Allowable uses and disclosures of HMIS data must adhere to those specified in the *Privacy & Security Notice*, or as permitted under applicable law. The unauthorized use or disclosure of HMIS data may be grounds for legal action.
- 3 All users and agencies are bound by all applicable federal, state and local confidentiality regulations and laws that protect Service Recipient data stored in and exported from HMIS or the Comp Site. All users and agencies will protect the confidentiality and security of Service Recipient data stored in and exported from HMIS.
- 4 Certain Service Recipient data is shared globally within HMIS regardless of Service Recipient consent in order to prevent the duplication of Service Recipient records. See the *Privacy & Security Notice* or the Agency HMIS Participation Agreement for more information about which data points are shared.
- 5 Except as permitted under applicable law and with exception to the data points that are shared globally within the Live Site, a Participating Agency must obtain Service Recipient consent to share data. That consent can be secured by one or more of the following means, per County-specific procedure:
  - a *Written* – signed release of information (ROI) kept in a local file
  - b *Verbal* – the client gives oral permission to the witness (agency staff)
    - i Every intake packet must have a verbal ROI in it. Each adult in the household should complete their own ROI form.
    - ii Collect and maintain records of all client informed consents or release of information forms in accordance with HMIS policies and procedures.
- 6 The minimum age at which someone can consent to HMIS data sharing for themselves is 14. For anyone under 14 years of age, another adult (18+) household member must provide consent to share data.
- 7 An adult (18+) cannot provide HMIS data sharing consent for another adult unless the first adult is the agent or personal representative of the second adult or has power of attorney (POA) over the second.

- a** Before an adult can consent to share the HMIS data of another adult, agency staff must secure and retain a copy of POA, guardianship or other authority that demonstrates personal representation.
- 8** In the event that a Participating Agency receives a subpoena for HMIS data, the Participating Agency will immediately notify their HMIS Lead Agency, who in turn will immediately notify their legal counsel and the Primary System Administrator, who in turn will immediately notify their respective legal counsel. Counsel will review the validity of the subpoena. Once it is deemed valid, Counsel will direct either County or agency staff to share only the information explicitly identified. Hard copy releases are not required in the event a valid subpoena is received unless the law prohibits disclosure of the information without a signed release.
- 9** Participating Agencies that manage their own user licenses will ensure that all End Users are issued a unique User ID and password for HMIS.
- 10** Participating Agencies that do not manage their own user licenses are responsible for contacting their HMIS Lead Agency regarding the addition, modification or revocation of user licenses in a timely manner. Participating Agencies that manage their own user licenses are responsible for the addition, modification or revocation of their own user licenses in a timely manner.
- 11** Participating Agencies are responsible for ensuring that all End Users receive appropriate HMIS privacy, security, confidentiality and other required training. Please contact your HMIS Lead Agency with any questions about required training.
- 12** Privacy rules, including but not limited to those under HIPAA, 42 CFR Part 2, FERPA, COPPA and VAWA may take precedence over HMIS privacy standards. If applicable, agencies covered by such regulations must abide by those regulations.
- 13** The creation and use of anonymous records should be used only if absolutely necessary, as such practices can inhibit the accuracy of analyses that require deduplication of Service Recipient records. Please contact your HMIS Lead Agency or the Primary System Administrator to discuss alternatives.
- 14** Prior to accessing HMIS, all participating agencies must verify that appropriate risk management techniques, including administrative, technical, and physical safeguards, have been implemented on all systems and devices that will be used to access HMIS to protect and ensure the security of and continuity of access to HMIS.
- 15** End Users may access HMIS from web-capable devices – both on agency premises or at remote locations – that have been approved by their Participating Agency.
- 16** Prior to accessing HMIS, all End Users must sign an End User License Agreement that is approved by their HMIS Lead Agency. HMIS Lead Agencies may require EULAs to be renewed periodically.
- 17** Before staff from a given agency may access HMIS, a qualified stakeholder from that agency must read, understand and sign a HMIS Agency Participation Agreement that is approved by the HMIS Lead Agency. HMIS Lead Agencies may periodically require renewed HMIS Agency Participation Agreements.

## 9. Reports / Data Submissions

- 1 Aggregate reporting and analysis is done on a regular basis without notification. This includes but is not limited to reporting and analysis at the continuum/community level.
- 2 With exception to Comp Site data, electronic transfers of data either into or out of HMIS may occur at any time. Transfers of non-aggregate data, whether personally identifying or de-identified, to third parties require approval and appropriate agreements.
- 3 All published, summary data and other statistical information must comply with the *Privacy & Security Notice*.
- 4 Access to Service Recipient data by Participating Agencies and their End Users will be limited based upon allowable visibility settings, as set forth by the HMIS Lead Agency, the *Privacy & Security Notice*, and Participant ROIs, as applicable.
- 5 The general public can request non-identifying aggregate and statistical data by submitting a data request. HMIS Lead Agencies should be contacted for any public request. Implementation-wide aggregate report requests should be sent to the Primary System Administrator.
- 6 The Primary System Administrator will notify and coordinate with County System Administrators as needed for any implementation-wide, aggregate report requests.
- 7 Non-identifying aggregate and statistical data may be removed from data deliverables if they represent a quantity that the preparer deems likely to make reidentification of a given individual feasible.
- 8 End Users should avoid storing the personally identifying information of Service Recipients on local drives (i.e. to your device). If Service Recipient data is saved to a local drive, that data must be securely deleted as soon as possible once the data is no longer being actively used.
- 9 The Primary System Administrator may run reports to assess data quality and level of participation by Participating Agencies.
- 10 HMIS Lead Agencies or the Primary System Administrator may run reports for research, analysis, program evaluation or monitoring purposes. Personally identifying data will never appear on a research report.
- 11 HMIS Lead Agencies or the Primary System Administrator may share de-identified data with third parties for research, analysis or program evaluation purposes.

## 10. Roles & Responsibilities

- 1 **End User** – For End User roles & responsibilities, see the EULA.

## **2 Agency Administrator**

All subsequent Agency Administrator roles & responsibilities herein should be considered an ideal fulfillment of the role and may not be feasible or indicated in all circumstances. In situations where staff capacity is insufficient or where the County System Administrator allows for a different set of Agency Administrator roles & responsibilities, some of the below may not apply.

- a** Agency Administrators will observe and enforce all End User responsibilities, as indicated in the End User License Agreement.
- b** Agency Administrators will observe and enforce all Participating Agency responsibilities for their Agency, as specified in this document.
- c** Agency Administrators will use HMIS's Agency News functionality to share information with their own agency's End Users.
- d** Agency Administrators will act as the first level of HMIS administration and support for their own Participating Agency.
- e** Unless otherwise provided by the HMIS Lead Agency, Agency Administrators are responsible for the initial training of new End Users in their agency.
- f** Agency Administrators are responsible for monitoring all End User access and HMIS use within their own agency.
- g** Agency Administrators will regularly run and review audit reports to ensure policies are being followed by staff.
- h** Agency Administrators will coordinate and collaborate with their designated HMIS Lead Agency or Comp Site System Administrator for technical assistance as needed.
- i** Capacity allowing, Agency Administrators will fulfill SAP BO report creation, update and maintenance requests for their Agency's stakeholders.
- j** Agency Administrators will submit SAP BO report development requests that they are not able to fulfill themselves to their HMIS Lead Agency.

## **3 Agency Data Contact**

- a** Responds to communications from HMIS Lead Agency
- b** Distributes information to other agency staff, as needed
- c** Collaboratively troubleshoots issues with HMIS Lead Agency
- d** May or may not hold the Agency Administrator role, as defined above
- e** May or may not hold an Agency Administrator user role within HMIS
- f** Receives the monthly data quality report, if no other recipients are identified

**4 Participating Agency** – For Participating Agency roles & responsibilities, see the Agency HMIS Participation Agreement.

**5 HMIS Lead Agency**

- a** HMIS Lead Agencies will coordinate and collaborate with the Primary System Administrator for technical assistance and support as needed.
- b** HMIS Lead Agencies will coordinate and collaborate with their CoC Lead as needed to maintain compliance with all relevant regulations for which the CoC is responsible.
- c** HMIS Lead Agencies will monitor HMIS for compliance with HUD requirements and federal, state and local laws. HMIS Lead Agencies will communicate discrepancies with the Primary System Administrator.
- d** HMIS Lead Agencies will provide staffing, facilitation, project management and leadership for CoC-level HMIS operations, projects, governance and required federal, state and local reporting.
- e** HMIS Lead Agencies will convene Agency Administrators and/or other key stakeholders periodically to address operational issues impacting their shared CoC.
- f** HMIS Lead Agencies will create and maintain CoC-specific HMIS Administrative Document templates, as needed.
- g** HMIS Lead Agencies may restrict the degree to which an agency privacy notice can diverge from the *Privacy & Security Notice*.
- h** HMIS Lead Agencies will be collector, keeper and monitor of signed HMIS Administrative Documents, unless otherwise agreed upon in writing by the HMIS Lead Agency and the Primary System Administrator.
- i** HMIS Lead Agencies will create and maintain local project documentation.
- j** HMIS Lead Agencies will monitor and manage data quality for local jurisdiction, including creation, maintenance of and adherence to the CoC's Data Quality Plan.
- k** HMIS Lead Agencies will create, update and monitor CoC-specific data standards, as needed.
- l** HMIS Lead Agencies will adhere to and enforce all federal, state and local HMIS standards and rules within CoCs.
- m** HMIS Lead Agencies will provide corrective action plans to Participating Agencies that do not meet minimum standards, as identified through compliance monitoring activities.
- n** HMIS Lead Agencies will resolve and/or work with Agency Administrators and/or other End Users to resolve outstanding corrective actions from HMIS Lead Agency or Primary System Administrator monitoring.

- o** HMIS Lead Agencies will grant, monitor and revoke End User licenses for their own CoC's End Users.
- p** HMIS Lead Agencies will revoke or update End User HMIS licenses as soon as possible following an End User's change in role or termination of employment.
- q** Unless otherwise delegated to approved Agency Administrators, HMIS Lead Agencies will develop, deliver and monitor completion of all needed End User training within their own CoC.
- r** Unless otherwise delegated to approved Agency Administrators, HMIS Lead Agencies will confirm that all End Users have signed a EULA and have completed all required training prior to receiving access to HMIS.
- s** HMIS Lead Agencies will provide technical assistance to End Users within their CoC, sometimes referred to as "refresher training", unless otherwise provided by Agency Administrators.
- t** HMIS Lead Agencies will notify the Primary System Administrator of any CoC-specific HMIS customizations.
- u** HMIS Lead Agencies will answer questions comparable to those in Appendix A below prior to adding or changing questions in HMIS.
- v** Unless otherwise delegated to approved Agency Administrators, HMIS Lead Agencies will create and manage HMIS providers and associated workflows within their own CoC as needed. HMIS Lead Agencies must review for accuracy all HMIS providers created by Agency Administrators.
- w** HMIS Lead Agencies will monitor, manage and troubleshoot HMIS End User and provider visibility settings, structures and associated issues.
- x** HMIS Lead Agencies will configure visibility settings to ensure access only to minimum data necessary for successful business operations for all End Users.
- y** HMIS Lead Agencies will promote and uphold best principles and practices with regard to managing the system, including sustainability and scalability via the standardization and optimization of workflows, naming conventions and reports, where possible. HMIS Lead Agencies will strive to minimize unnecessary complexity and the creation of redundant data elements, workflows and reports.
- z** HMIS Lead Agencies will create local documentation, including policies and procedures, agreements, etc., as needed, that are comparable to corresponding documents created by the Primary System Administrator and align with HMIS and Coordinated Entry best practices.
- aa** HMIS Lead Agencies will report any unauthorized data access, use or disclosure, anomalous activity or non-compliant behavior with regard to HMIS to the Primary System Administrator. HMIS Lead Agencies will coordinate suitable responses according to specified protocols.

- bb** HMIS Lead Agencies will fulfill or oversee the fulfillment of any SAP BO report creation, update or maintenance requests that Agency Administrators within the same CoC cannot fulfill themselves.
- cc** HMIS Lead Agencies must designate at least one person as a County System Administrator.
- dd** The HMIS Lead Agency may designate no more than two people as County System Administrators. A second County System Administrator requires written permission from the Primary System Administrator.

## **6 County System Administrator**

- a** County System Administrators will be situated within HMIS Lead Agencies.
- b** County System Administrators are responsible for the fulfillment of all responsibilities of their own HMIS Lead Agency.
- c** County System Administrators will act as the lead liaison with the Primary System Administrator on behalf of their CoC.
- d** If more than one person within a HMIS Lead Agency is designated as a County System Administrator:
  - i** Unless otherwise approved in writing by the Primary System Administrator, only one County System Administrator will be granted a System Administrator 2 license.
  - ii** Only one will be regarded as the lead liaison with the Primary System Administrator on behalf of their CoC.

## **7 Comp Site System Administrator (Comp Site Only)**

- a** The Comp Site Administrator will coordinate and collaborate with the HMIS Lead Agencies and/or Primary System Administrator for technical assistance as needed.
- b** The Comp Site Administrator will monitor HMIS for compliance with HUD requirements and federal and state laws and will communicate discrepancies with the Primary System Administrator.
- c** The Comp Site Administrator will coordinate with HMIS Lead Agencies and contribute as needed to CoC-level operations, projects, governance and required federal, state and local reporting.
- d** The Comp Site Administrator will convene Agency Administrators and/or other key stakeholders periodically to address operational issues impacting the Comp Site.
- e** The Comp Site Administrator will coordinate with the HMIS Lead Agencies and/or the Primary System Administrator as needed to create and maintain CoC-specific HMIS Administrative Document templates.

- f** The Comp Site Administrator will be collector, keeper and monitor of signed HMIS Administrative Documents for the Comp Site, unless otherwise agreed upon by the HMIS Lead Agency and the Primary System Administrator.
- g** In coordination with the County System Administrator(s), the Comp Site Administrator will coordinate with VSPs to monitor and manage data quality.
- h** The Comp Site Administrator will coordinate with the HMIS Lead Agencies to create, update and monitor CoC-specific data standards, as needed.
- i** The Comp Site Administrator will ensure adherence to and enforcement of all applicable Comp Site standards and rules within CoCs.
- j** The Comp Site Administrator will coordinate with the HMIS Lead Agencies to provide corrective action plans to Participating Agencies that do not meet minimum standards in the Comp Site, as identified through monitoring activities.
- k** The Comp Site Administrator will coordinate with the HMIS Lead Agencies to resolve and/or work with Agency Administrators to resolve outstanding corrective actions from the last Comp Site Administrator monitoring.
- l** In coordination with the County System Administrator(s), the Comp Site Administrator will grant, monitor and revoke End User licenses for the Comp Site.
- m** Unless otherwise delegated to approved Agency Administrators, the Comp Site Administrator, in coordination with the County System Administrator(s), will develop, deliver and monitor completion of all needed End User training for the Comp Site.
- n** Unless otherwise delegated to approved Agency Administrators, the Comp Site Administrator will confirm that all End Users have signed a EULA and have completed all required training prior to receiving access to the Comp Site.
- o** The Comp Site Administrator will provide technical assistance to Comp Site End Users, sometimes referred to as “refresher training”, unless otherwise provided by Agency Administrators.
- p** In coordination with the County System Administrator, the Comp Site Administrator will create and manage Comp Site providers and associated workflows.
- q** The Comp Site Administrator will coordinate with the HMIS Lead Agencies and the Primary System Administrator to promote and uphold best principles and practices with regard to managing the system, including sustainability and scalability via the standardization and optimization of workflows, naming conventions and reports, where possible.
- r** The Comp Site Administrator will report any unauthorized data access, use or disclosure, anomalous activity or non-compliant behavior with regard to Comp Site to the Primary System Administrator, and will coordinate suitable responses according to specified protocols.

## **8 Primary System Administrator**

- a** The Primary System Administrator will be the primary liaison with and monitor of WellSky, the HMIS vendor.
- b** The Primary System Administrator will monitor HMIS for HUD and all other required compliance and communicate discrepancies with WellSky.
- c** The Primary System Administrator will be accountable for the evaluation and overall success of the Live Site implementation and will coordinate with the Comp Site System Administrator to ensure overall success of the Comp Site.
- d** The Primary System Administrator will staff, facilitate and lead implementation-level operations, projects, system evaluation, and governance of the Live Site.
- e** The Primary System Administrator will promote and uphold best principles and practices with regard to managing the system, including sustainability and scalability via the standardization and optimization of workflows, naming conventions and reports, where possible. The Primary System Administrator will strive to minimize complexity and the creation of redundant data elements, workflows and reports.
- f** The Primary System Administrator will provide change management, communication and facilitation to HMIS Lead Agencies and the Comp Site System Administrator as needed for a variety of HMIS related issues including but not limited to HMIS updates, fixes, HUD data standards updates and HUD reporting milestones.
- g** The Primary System Administrator will provide technical assistance, administrative support - including SAP BO report development - and training, as needed, to HMIS Lead Agencies and the Comp Site System Administrator.
- h** The Primary System Administrator will create and maintain implementation-level HMIS Administrative Document templates.
- i** The Primary System Administrator will monitor, enforce compliance with and keep implementation-level privacy, security and confidentiality requirements for the Live Site and will keep implementation-level policies and procedures and intergovernmental agreements for both the Live Site and Comp Site.
- j** The Primary System Administrator will provide corrective action plans to HMIS Lead Agencies and/or Participating Agencies that do not meet minimum standards, as identified through monitoring activities.
- k** The Primary System Administrator will procure/renew HMIS licensing and End User licenses.

## 11 Appendix A: Suggested Questions for Adding or Making Changes to Local Data Elements

The Primary System Administrator recommends that staff seeking to create or update data elements in the Live Site answer each of the following questions as completely as possible and share them with the County System Administrator in advance of implementation. Although answering these questions is not technically required, the successful implementation of any question in the system does require answers to many of the questions below. The Primary System Administrator recommends that staff also answer the Equity Lens questions (see Appendix B below) as part of this exercise.

- Would this be a new question or a change to an existing question?
- How would the question be asked? What are the answer options?
- What is the impetus/motivation for the request? Who is making the request?
- What are the research questions you're looking to answer by adding this element?
- Would the data collection requirement be system wide or aligned to a particular program, program type and/or funding source? If so, which one(s)?
- From which Household members will the element be collected (e.g., adults only, HOHs only, all participants)?
- Would this replace any existing question and/or support an existing question? If so, which?
- Would the question be collected at program entry, interim update, at exit or a combination thereof? Would it be collected one time or multiple times?
- What helper text would go along with the question?
- In which assessment(s) would this question be located?
- How would the question be integrated into existing workflows?
- What is the "line drawn in the sand" for this data element? (i.e., the date on which either all new or all existing clients must have the question answered)
- Is there a data collection/entry burden for providers?
- Would new training materials be necessary or useful to clarify the data element? If so, how?
- Will your HMIS Lead Agency have sufficient capacity to provide training and/or monitor data quality?
- Does this new element need to be reportable? If so, please describe whether a new report or update of an existing report is required.
- If report development is necessary, is there capacity to do it?
- What is the timeline for implementation?

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## 12 Appendix B: Equity Lens Questions

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*The following questions were adapted from the Multnomah County Joint Office of Homeless Services Racial Equity Lens Tool.*

- How is data and historic experience informing decision making? How are you collecting, reviewing, and analyzing demographic data to inform the proposal?
- Who will benefit from or be burdened by the proposal? Identify impacted communities and groups.
- Which group(s) may experience disparities related to the proposal?
- What are the racial demographics impacted by the proposal?
- What intersectional identities will be impacted by the proposal?
- Will the proposal have different impacts within different geographic areas?
- Are those most burdened, represented at the decision-making table? (If not, why not?)
- How have communities and stakeholders been engaged? What was the objective of the engagement? What opportunities exist to expand or enhance community and stakeholder engagement and input?
- Please share any systemic barriers or possible unintended consequences that have been identified related to this project or process.
- Based on the above responses, what are possible revisions to the proposal under consideration? What other processes in this proposal will need a racial equity lens tool application? When will the racial equity lens be applied during these processes?

## Revision History

Date of Update	Person Making Update	Revision <i>Note: Section numbers may change over time. Referenced section numbers are accurate at time of revision.</i>
06/16/26	S. Richard	<p>- Replaced all mentions of “CSS” with “HMIS” - Various language adjustments to clarify policies.</p> <hr/> <p><b>Section 5: Definitions</b> <b>Added:</b> Information related to agency data contacts. Detail to what constitutes a Participating Agency</p> <hr/> <p><b>Section 6: Equipment, Materials and Supplies</b> <b>Added:</b> Policy regarding digitized documents for record retention</p> <hr/> <p><b>Section 8: Privacy, Confidentiality &amp; Security</b> <b>Added:</b> Details around verbal ROI form requirements. Removed language around inferred consent, as this method should not be used for HMIS data sharing by participating agencies in Multnomah. Policies around data sharing: Minimum age for consent, power of attorney &amp; related requirements. <b>Updated:</b> Language regarding subpoenas</p> <hr/> <p><b>Section 10: Roles &amp; Responsibilities</b> <b>Added:</b> Information related to agency data contacts.</p>
06/13/23	S. Richard	<p><b>Section: 8.2</b> <b>Was:</b> “...specified in the <u>county-specific</u> <i>Privacy &amp; Security Notice...</i>” <b>Edited to:</b> “...specified in the <i>Privacy &amp; Security Notice...</i>”</p> <hr/> <p><b>Section: 10.4.h</b> <b>Was:</b> “...agreed upon by the HMIS Lead...” <b>Edited to:</b> “...agreed upon <u>in writing</u> by the HMIS Lead...”</p>
06/06/23	S. Richard	<p><b>Section: 5. Definitions - Definition for “HMIS Administrative Documents”</b> <b>Was:</b> “...Participating <u>Service Provider</u> Agencies must complete...” <b>Edited to:</b> “...Participating Agencies must complete...”</p>