



**HMIS POLICIES AND PROCEDURES
COALITION TO END HOMELESSNESS**

Wichita/Sedgwick County Continuum of Care (KS-502)

Table of Contents

Project Summary	5
1. Introduction.....	6
1.1 Purpose.....	6
1.2 Applicability	6
1.3 Authority.....	6
1.4 Document Review and Amendment.....	6
1.5 Document Structure	7
2. Legal Authority and Regulatory References	8
2.1 Governing Regulations.....	8
2.2 Core Federal Requirements	8
2.3 Additional References.....	8
2.4 Legal Hierarchy	8
3. Roles and Responsibilities	9
3.1 HMIS & Data Committee (Data Subcommittee)	9
3.2 HMIS Lead Agency (United Way of the Plains)	9
3.3 Participating Agencies.....	10
4. HMIS Participation & User Access	11
4.1 Agency Participation Requirements.....	11
4.2 User Eligibility and Agreements.....	11
4.3 User Access Levels	11
4.4 User Training Requirements	13
4.5 Account Inactivity and Security	13
5. Data Collection Standards	14
5.1 HUD Data Standards	14
5.2 Local Data Elements	15
5.3 CAS and Consent Process	15
6. Main Workflow and Procedures	16
6.1 Client Intake and CAS/ROI Submission	16
6.2 Client Enrollment	16
6.3 Service Tracking and Case Notes	16
6.4 Expectations:	16
6.5 Coordinated Entry and Queue Placement	17
6.6 Client Exits and Destinations	17
6.7 Technical Support and Help Desk Requests	17
7. Victim Service Providers (VSPs).....	18
7.1 VSP Participation in HMIS and Coordinated Entry	18
7.2 Referral and Enrollment Workflow	18

7.3 Confidentiality and Data Entry Protocols.....	18
7.4 Training and Support	19
8. Data Entry Standards	20
8.1 Timeliness of Data Entry	20
8.2 Enrollment, Exit, and Housing Move-In	20
8.3 Assessments, Notes, and Services	20
8.4 Common Data Entry Issues and Quality Targets.....	21
9. Privacy, Consent, and Confidentiality	22
9.1 Regulatory Basis.....	22
9.2 Client Consent.....	22
9.3 Privacy Notice	22
9.4 Confidentiality Standards	23
9.5 Special Populations and Exceptions.....	23
10. Security Standards and Protocols.....	24
10.1 Access Control and User Security	24
10.2 Device and Network Security	24
10.3 Physical and Administrative Safeguards	24
10.4 Incident Reporting and Breaches.....	24
10.5 Audits and Monitoring.....	25
11. Data Quality and Monitoring	26
11.1 Data Quality Objectives	26
11.2 Monitoring and Review Process	26
11.3 Participating Agency Responsibilities	26
11.4 Case Conferencing and Coordinated Entry Oversight.....	27
11.5 Reporting Compliance	27
12. HMIS Reporting.....	28
12.1 Federal Reports.....	28
12.2 CoC and Local Reports	28
12.3 Participating Agency Responsibilities	28
12.4 Report Storage and Access	29
13. Governance and Compliance	30
13.1 Governance Structure.....	30
13.2 Interagency Network Data Sharing Agreement and Agency Responsibilities.....	30
13.3 Compliance Monitoring and Corrective Action	31
13.4 Annual Review and Reporting	31
14. Whistleblower and Complaint Policy	32
14.1 Reporting Responsibilities	32
14.2 Investigation and Resolution	32

14.3 No Retaliation	33
15. Policy Amendment and Review Process	34
15.1 Annual Review	34
15.2 Interim Updates	34
15.3 Notification and Version Control	34
15.4 Amendment Record	34
16. Definitions and Glossary.....	35
Appendix A: Notice to Clients of Uses and Disclosures.....	39
Appendix B: Case Conferencing Code of Ethics and Guidance	42
Appendix C: HMIS User Agreement.....	44
Appendix D: Interagency Network Data Sharing Agreement	46
Appendix E: Corrective Action Plan (CAP).....	51
Appendix F: HMIS Feedback and Complaint Form	53
Appendix G: HMIS Agency Application (KS-502)	55
Appendix H: HMIS Agency Eligibility Rubric (KS-502)	58

PROJECT SUMMARY

The Homeless Management Information System (HMIS) is a secure, client-level data system mandated by the U.S. Department of Housing and Urban Development (HUD) for all Continuums of Care (CoCs). It is used to document housing and service provision for individuals and families experiencing or at risk of homelessness.

The HMIS for the KS-502 Wichita/Sedgwick County Continuum of Care is operated under the governance of the Coalition to End Homelessness in Wichita/Sedgwick County. The CoC has designated United Way of the Plains (UWP) as the HMIS Lead Agency since 2001.

HMIS services are delivered using Clarity Human Services, a web-based platform developed and maintained by Bitfocus, Inc. The HMIS supports Coordinated Entry, program-level tracking, system-wide performance measurement, and compliance with federal and local reporting requirements.

This document outlines the roles, responsibilities, data standards, and security protocols necessary to administer and participate in the HMIS. It reflects federal regulations under 24 CFR Part 578, the FY2024 HMIS Data Standards, and local policies adopted by the Coalition.

ALL AGENCIES ACCESSING OR CONTRIBUTING TO HMIS MUST ADHERE TO THE STANDARDS AND PROCEDURES DESCRIBED HEREIN, INCLUDING THOSE FUNDED BY:

- HUD CoC Program and Emergency Solutions Grant (ESG);
- Housing Opportunities for Persons with AIDS (HOPWA);
- Supportive Services for Veteran Families (SSVF);
- Projects for Assistance in Transition from Homelessness (PATH);
- Runaway and Homeless Youth (RHY) programs;
- Other federal, state, or local funding sources supporting homelessness services.

1. INTRODUCTION

1.1 PURPOSE

The Kansas Continuum of Care (CoC) for Wichita/Sedgwick County (KS-502) maintains a Homeless Management Information System (HMIS) to collect, manage, and report data on individuals and families experiencing or at risk of homelessness. This system enables the CoC to coordinate services, measure outcomes, and meet state and federal reporting requirements.

The policies and procedures outlined in this document establish the framework for HMIS participation and governance in accordance with federal regulations, including 24 CFR Part 578, the FY2024 HMIS Data Standards, and applicable HUD notices.

1.2 APPLICABILITY

THESE POLICIES APPLY TO:

- The CoC Governing Board;
- The HMIS Lead Agency;
- Participating Agencies (PAs);
- End Users of the HMIS;
- Committees tasked with oversight, including the HMIS & Data Committee (also referred to as the Data Subcommittee).

Participation in HMIS is required for agencies receiving funding through HUD's Continuum of Care (CoC) and Emergency Solutions Grants (ESG) programs. Participation is also expected of agencies funded by HOPWA, PATH, SSVF, RHY, and other federal or local programs contributing to the region's homelessness response system (see 24 CFR § 578.7(b)(3)).

1.3 AUTHORITY

This document is developed under the authority of the KS-502 Continuum of Care in alignment with responsibilities assigned in 24 CFR § 578.7. As required by § 578.7(b), the CoC:

- Designates a single HMIS for the geographic area;
- Designates an HMIS Lead Agency;
- Establishes and updates policies and procedures, including privacy, security, and data quality plans;
- Ensures consistent HMIS participation by recipients and subrecipients.

The CoC has designated United Way of the Plains (UWP) as the HMIS Lead Agency since 2001. UWP contracts with Bitfocus, Inc. to implement and manage the Clarity Human Services platform, the current HMIS software.

1.4 DOCUMENT REVIEW AND AMENDMENT

These Policies and Procedures must be reviewed and updated at least annually by the HMIS & Data Committee and approved by the CoC Governing Board or other designated leadership body. Amendments may be made more frequently in response to regulatory changes, software updates, or CoC decisions.

Supporting plans—including the HMIS Data Privacy Plan, Security Plan, and Data Quality Plan—may be updated separately by the HMIS Lead Agency with committee approval, as allowed by § 578.7(b)(5).

1.5 DOCUMENT STRUCTURE

THIS DOCUMENT IS ORGANIZED INTO SIXTEEN SECTIONS, COVERING:

- Roles and responsibilities;
- Participation and user access;
- Data standards and quality;
- Security, privacy, and consent;
- Governance, compliance, and reporting;
- Definitions and appendices.

2. LEGAL AUTHORITY AND REGULATORY REFERENCES

2.1 GOVERNING REGULATIONS

The policies and procedures outlined in this document are governed by federal law, specifically Title 24, Part 578 of the Code of Federal Regulations (24 CFR Part 578), which establishes the rules for the Continuum of Care (CoC) Program administered by the U.S. Department of Housing and Urban Development (HUD).

These regulations assign the CoC responsibility for designating a Homeless Management Information System (HMIS), selecting an HMIS Lead Agency, and establishing written policies and procedures that ensure privacy, data quality, security, and compliance with HMIS standards (24 CFR § 578.7(b)).

2.2 CORE FEDERAL REQUIREMENTS

THE FOLLOWING SECTIONS OF 24 CFR PART 578 ARE SPECIFICALLY REFERENCED OR INCORPORATED THROUGHOUT THIS DOCUMENT:

- § 578.3 – Definitions of terms including HMIS, Participating Agency, Program Participant, and Project;
- §§ 578.5–578.7 – CoC responsibilities, including designation of the HMIS and HMIS Lead Agency;
- § 578.57(a)(1)(vii) – Allowable costs related to HMIS administration, staffing, and training;
- § 578.65 – Recordkeeping and reporting requirements;
- § 578.103 – Requirements for documentation, record retention, and client file management.
- All HMIS participants must operate in compliance with these sections and any relevant HUD Notices, technical assistance materials, and future updates to the CoC Program Rule.

2.3 ADDITIONAL REFERENCES

THIS DOCUMENT ALSO ALIGNS WITH AND REFERENCES THE FOLLOWING:

- FY2024 HMIS Data Standards Manual and Data Dictionary (HUD Exchange);
- HUD Coordinated Entry Notice: CPD-17-01;
- Interagency Network Data Sharing Agreement;
- Coalition to End Homelessness in Wichita/Sedgwick County Governance Charter (2025 revision);
- Bitfocus Clarity Human Services user guides and privacy tools;
- HUD Technical Assistance guidance and webinar materials published via HUD Exchange.

2.4 LEGAL HIERARCHY

In the event of any conflict between this document and federal regulations, the federal regulations shall prevail. All Participating Agencies are expected to review and follow updates from HUD regarding HMIS guidance, including revised data standards, privacy and security protocols, and reporting requirements.

3. ROLES AND RESPONSIBILITIES

This section outlines the roles and responsibilities of key stakeholders in the operation, oversight, and use of the HMIS within the KS-502 Continuum of Care (CoC). These roles are assigned in accordance with 24 CFR § 578.7(b) and further defined by the Coalition’s Governance Charter and HMIS Policies.

3.1 HMIS & DATA COMMITTEE (DATA SUBCOMMITTEE)

The HMIS & Data Committee (also referred to as the Data Subcommittee) was established by the Coalition Membership to advise the HMIS Lead Agency and represent the interests of Participating Agencies.

RESPONSIBILITIES:

- Review and recommend updates to the HMIS Policies and Procedures and all associated plans;
- Review requests from new agencies seeking HMIS access, including feedback on HMIS Agency Applications and use of the HMIS Agency Eligibility Rubric as needed;
- Oversee agency compliance with HMIS protocols, including data quality and timely entry;
- Recommend system or process improvements to the HMIS Administrator or software vendor;
- Submit reports to the Governing Board and Coalition Membership on HMIS use, participation levels, and data quality outcomes, including HUD-mandated reports such as the Housing Inventory Count (HIC), Point-in-Time Count (PIT), and Longitudinal System Analysis (LSA).
- Support community-wide efforts to achieve full HMIS participation;

MEMBERSHIP:

- Comprised of seven members, with representation from diverse CoC Participating Agencies;
- Members must be active HMIS users or signatories of HMIS User Agreements;
- All applicants, including current committee members seeking renewal, must submit applications annually and are elected by the Coalition Voting Membership;
- Individuals with lived experience of homelessness are strongly encouraged to apply;
- Members may serve renewable one-year terms;
- Members must not serve on multiple CoC committees;
- The Committee is chaired by the HMIS Administrator or another staff member designated by the HMIS Lead Agency.

The Committee serves in an advisory capacity; however, final decision-making authority rests with the HMIS Lead Agency.

Voting procedures, quorum rules, and eligibility criteria are governed by the Coalition’s Governance Charter.

3.2 HMIS LEAD AGENCY (UNITED WAY OF THE PLAINS)

The HMIS Lead Agency is responsible for administering the day-to-day operations of the HMIS and ensuring that all system functions comply with federal standards and local expectations.

RESPONSIBILITIES:

- Serve as the primary contact with the HMIS vendor (Bitfocus, Inc.);
- Maintain and implement the HMIS Privacy, Security, and Data Quality Plans;

- Develop and manage the HMIS budget, including identifying funding sources (§ 578.57(a)(1)(vii));
- Execute and maintain Memoranda of Agreement (MOAs) with all Participating Agencies;
- Onboard and train new HMIS users; provide refresher trainings;
- Facilitate the HMIS & Data Committee;
- Manage help desk functions, technical assistance, and end-user support;
- Submit required reports to HUD (SPM, LSA, HIC, PIT, APR, CAPER);
- Oversee monitoring and remediation processes for agency noncompliance.

The HMIS Lead retains authority for all operational responsibilities not explicitly assigned to the CoC Governing Board or HMIS & Data Committee.

3.3 PARTICIPATING AGENCIES

Any agency granted access to HMIS must sign a Memorandum of Agreement (MOA) with the HMIS Lead Agency and agree to the terms of this document.

RESPONSIBILITIES:

- Ensure that all HMIS users complete required training and sign an annual HMIS User Agreement;
- Collect and enter data in accordance with HUD standards and local protocols;
- Maintain accurate, complete, and timely client records in the HMIS;
- Display or provide, when requested, the required HMIS Privacy Notice at all intake sites;
- Secure all devices and locations from which HMIS is accessed;
- Cooperate with HMIS monitoring, audits, and data quality reviews;
- Promptly report changes in user status (e.g., staff termination or access needs).

Failure to comply with these responsibilities may result in temporary suspension or permanent removal from HMIS access.

4. HMIS PARTICIPATION & USER ACCESS

All agencies and individuals accessing the Homeless Management Information System (HMIS) must meet eligibility requirements, complete required documentation, and adhere to training and security standards. This section outlines the process for agency participation and user-level access.

4.1 AGENCY PARTICIPATION REQUIREMENTS

Participation in the HMIS is required for all recipients of HUD Continuum of Care (CoC) and Emergency Solutions Grant (ESG) funding and is strongly encouraged for other providers contributing to the homelessness response system (per 24 CFR § 578.7(b)(3)).

TO PARTICIPATE, AN AGENCY MUST:

- Submit a completed HMIS Agency Application (Appendix G) to the HMIS Lead Agency;
- Undergo review using the HMIS Agency Eligibility Rubric (Appendix H);
- Receive an approval decision (approval, conditional approval, or denial) from the HMIS Lead Agency, with input from the HMIS & Data Committee as needed;
- Sign the Interagency Network Data Sharing Agreement as outlined in Appendix D;
- Comply with all federal privacy, data security, and client rights standards; and
- Designate at least one internal HMIS Compliance Officer or similar role to manage user access and ensure agency-level compliance with HMIS standards.

Conditional approval may be granted when the Eligibility Rubric identifies gaps that can be addressed through technical assistance, policy updates, or staff training. In such cases, the HMIS Lead will document required conditions and timelines and may link them to a Corrective Action Plan (Appendix E), as appropriate.

4.2 USER ELIGIBILITY AND AGREEMENTS

EACH HMIS USER MUST:

- Be employed or contracted by a Participating Agency;
- Complete all required new user trainings, including the HMIS Orientation and workflow demonstration;
- Complete HUD-compliant privacy, security, and ethics training;
- Sign the HMIS User Agreement acknowledging responsibilities and data access limitations;
- Renew their User Agreement annually and complete a required annual refresher training;
- Access HMIS only through secure, authorized workstations.

The HMIS Lead Agency maintains all User Agreements and may suspend access for noncompliance, inactivity, or identified security risks.

4.3 USER ACCESS LEVELS

HMIS user accounts are configured based on agency function, staff responsibilities, and the principle of least privilege. Access is limited to the minimum necessary for users to perform their job duties in alignment with privacy and security standards.

Most users will have standard access, which includes enrolling clients, documenting services, completing assessments, and viewing records associated with their agency.

All user access is assigned by the HMIS Lead Agency in consultation with the Participating Agency and is subject to change based on staffing roles, agency needs, or compliance requirements.

4.4 USER TRAINING REQUIREMENTS

ALL HMIS USERS MUST COMPLETE THE FOLLOWING TRAINING COMPONENTS BEFORE RECEIVING SYSTEM ACCESS:

- New User Orientation, which includes (but is not limited to):
- HUD-compliant privacy, security, and ethics training;
- System navigation and data entry overview;
- Program- or project-specific workflow training (as applicable).

Refresher training is required annually. The HMIS Lead Agency may also assign additional training in response to audit findings, system updates, or user errors.

4.5 ACCOUNT INACTIVITY AND SECURITY

TO MAINTAIN SYSTEM INTEGRITY AND PROTECT CLIENT DATA, THE FOLLOWING ACCOUNT PROTOCOLS APPLY:

- User accounts will be automatically locked if inactive for 30 consecutive days;
- Locked accounts may be reactivated by submitting a help desk request to the HMIS Team at hmistech@unitedwayplains.org;
- Passwords must be changed every 180 days;
- The system allows up to four failed login attempts before a temporary lockout;
- If locked out, users will be unable to log in for two hours unless reset manually by the HMIS Lead during business hours.

Participating Agencies are responsible for notifying the HMIS Lead immediately when a user leaves the agency, changes roles, or no longer requires access. User accounts may be suspended or deactivated at the discretion of the HMIS Lead Agency to ensure compliance with privacy, security, and training policies.

5. DATA COLLECTION STANDARDS

Participating Agencies must collect and maintain complete, accurate, and timely client data in accordance with HUD's HMIS Data Standards and local policy. Data collection enables service coordination, performance reporting, funding compliance, and system improvement.

5.1 HUD DATA STANDARDS

All HMIS projects must collect data elements required by the FY2024 HMIS Data Standards Manual and Data Dictionary, as published by HUD and updated periodically.

REQUIRED ELEMENTS:

- Universal Data Elements (UDEs) – Required for all clients:
- Name
- Social Security Number (with quality code)
- Date of Birth
- Race and Ethnicity
- Gender
- Veteran Status
- Disabling Condition
- Client Location
- Relationship to Head of Household
- Project Start and Exit Dates
- Destination at Exit
- Prior Living Situation
- Housing Move-In Date (if applicable)

PROGRAM-SPECIFIC DATA ELEMENTS (PSDEs) – BASED ON FUNDING/PROJECT TYPE:

- Income and Sources
- Non-Cash Benefits
- Health Insurance
- Physical/Mental/Developmental Disabilities
- HIV/AIDS, Substance Use
- Domestic Violence status
- Date of Engagement
- Current Living Situation
- Coordinated Entry Assessments and Events
- Bed-night tracking (if applicable)

Reference: 24 CFR § 578.103 requires documentation and retention of client-level data sufficient to verify eligibility, services provided, and project performance.

5.2 LOCAL DATA ELEMENTS

KS-502 COLLECTS ADDITIONAL LOCALLY DEFINED DATA ELEMENTS TO SUPPORT COMMUNITY PLANNING AND STRATEGIC ANALYSIS. THESE MAY INCLUDE:

- Sedgwick County residency status
- Time spent in Sedgwick County prior to program enrollment
- Previous location information (if applicable)
- Release from jail or prison within the past 7 days
- Recent incarceration or institutional location (if applicable)

The HMIS Lead Agency may revise or expand local elements to meet evolving needs.

5.3 CAS AND CONSENT PROCESS

EACH CLIENT MUST COMPLETE A CLIENT ACKNOWLEDGMENT OF SERVICES (CAS) AND RELEASE OF INFORMATION (ROI) FORM AT PROGRAM ENTRY. THIS FORM:

- Must be signed by an adult household member, or signed by staff if verbal consent is given and the client is unable to sign;
- Applies to the full household;
- Must be uploaded by the agency to the designated “CE Fake” client profile in HMIS within 3 business days of initial contact;
- May be renewed as needed and is required to be updated if the household changes or after 5 years.

After upload, United Way of the Plains will create or update the actual client profile within 1 business day. Once the file is searchable in HMIS, users may proceed with enrollment and service documentation.

Victim Service Providers (VSPs) must follow separate consent and data entry protocols as outlined in Section 7, in accordance with privacy protections under the Violence Against Women Act (VAWA) and 24 CFR § 578.7(a)(8).

6. MAIN WORKFLOW AND PROCEDURES

This section outlines the standard HMIS workflow for client-level data entry and documentation in Clarity Human Services. These procedures apply to all Participating Agencies unless otherwise noted. Victim Service Provider workflows are addressed separately in Section 7.

6.1 CLIENT INTAKE AND CAS/ROI SUBMISSION

Before any data entry occurs, the client must complete a Client Acknowledgment of Services (CAS) and Release of Information (ROI) form.

KEY REQUIREMENTS:

- One adult household member must sign the CAS/ROI, or provide verbal consent documented by staff if unable to sign;
- The completed form applies to the entire household;
- The form must be uploaded to the designated “CE Fake” client profile in Clarity within 3 business days of initial client contact.

Once uploaded, the HMIS Lead Agency (United Way of the Plains) will create or update the live client profile in Clarity within 1 business day. Users may then proceed with enrollment and service documentation.

6.2 CLIENT ENROLLMENT

Clients should be enrolled in the appropriate project once services begin. Enrollment is defined as the point at which a client starts receiving assistance or becomes eligible for program tracking.

ENROLLMENT MUST INCLUDE:

- Accurate Project Start Date (based on first contact or service eligibility);
- Completion of program-specific assessments, if required;
- Entry of household members (if applicable);
- Linking of relevant documents in the Files tab.

For housing projects, enrollment occurs before move-in. The actual move-in date is recorded separately once housing is secured.

6.3 SERVICE TRACKING AND CASE NOTES

Participating Agencies are responsible for documenting all services and case management activities in a timely and professional manner.

6.4 EXPECTATIONS:

- Services should be added directly within the client’s enrollment;
- Case notes must be entered at least monthly for active clients;
- Notes should be factual, clear, and non-judgmental;
- Public alerts may be added to communicate important client safety or contact details;
- Agencies may upload additional documentation (e.g., ID, income verification) to the Files tab — the Form section should not be used.

6.5 COORDINATED ENTRY AND QUEUE PLACEMENT

Clients who complete a Coordinated Entry (CE) assessment may be added to the Community Queue based on eligibility and prioritization.

AGENCIES MUST:

- Complete the appropriate VI-SPDAT (based on household type);
- Add eligible clients to the Community Queue;
- Record all CE Events, including referrals, acceptances, and denials;
- Respond to housing referrals within 15 calendar days;
- Update client location and contact information regularly.

CE Events are used to track movement through the system and are required for HUD CE APR and CE performance reporting. Referrals may be accepted, denied (with reason), or returned to the queue. Events appear on the History tab and should be reviewed regularly.

6.6 CLIENT EXITS AND DESTINATIONS

Clients must be exited from HMIS projects once services have ended, housing is secured, or contact is lost.

EXIT PROTOCOLS:

- Exit Date should reflect the last day the client was actively served or contacted;
- Destination is a required field — use the most accurate option available;
- If housing is secured, ensure the Housing Move-In Date is entered separately in the enrollment;
- Exit assessments should be completed and services closed.

Clients placed on the Community Queue must also be removed when housed — notify the HMIS team to complete the Queue exit.

6.7 TECHNICAL SUPPORT AND HELP DESK REQUESTS

Users experiencing technical issues, data entry problems, or account access challenges should contact the HMIS Team directly.

HELP DESK CONTACT:

HMISTECH@UNITEDWAYPLAINS.ORG

(316) 267-1321 EXT. 4171

GUIDELINES:

- Do not submit client PII in emails;
- Include client Unique Identifier (UID) if needed;
- Specify the issue clearly (e.g., “Enrollment won’t save,” “Need to reset password”);
- Requests are prioritized during business hours and addressed in the order received.

Additional guidance and training videos are available at:

<https://unitedwayplains.org/homeless-management-information-system/>

7. VICTIM SERVICE PROVIDERS (VSPS)

Victim Service Providers (VSPs) are agencies whose primary mission is to serve survivors of domestic violence, sexual assault, human trafficking, or stalking. Under the Violence Against Women Act (VAWA) and 24 CFR § 578.7(a)(8), VSPs are prohibited from entering personally identifying information (PII) into HMIS without informed, written consent and must follow strict confidentiality protocols.

7.1 VSP PARTICIPATION IN HMIS AND COORDINATED ENTRY

VSPs in the KS-502 CoC participate in Coordinated Entry (CE) and access housing resources through a de-identified referral workflow. While VSPs do not directly enter personally identifying information (PII) into HMIS, they may facilitate client access to housing and services through a secure, de-identified referral process administered by the HMIS Lead Agency.

PARTICIPATION IS GOVERNED BY THE FOLLOWING PRINCIPLES:

- No identifying information may be entered into HMIS without documented client consent;
 - VSPs must use secure fax or other approved encrypted methods of communication;
 - Referrals to the CE system are submitted using the HMIS Lead's designated de-identified entry process.
-

7.2 REFERRAL AND ENROLLMENT WORKFLOW

1. Complete CAS and ROI Forms
VSP staff meet with the client and complete the VSP-specific CAS and Consent forms.
 2. Secure Transmission
Completed forms are faxed to the HMIS Lead Agency (United Way of the Plains) using a secure eFax line:
1-833-630-3869 (Attn: HMIS Administrator)
 3. Profile Creation by HMIS Lead
The HMIS Lead creates a de-identified client profile in Clarity Human Services and returns the HMIS ID and alias to the referring VSP.
 4. Enrollment and Case Management
The VSP uses the alias profile to:
 - a. Enter project enrollment;
 - b. Complete the appropriate VI-SPDAT;
 - c. Add the client to the Community Queue (if eligible);
 - d. Document services, notes, and assessments (at minimum, monthly).
 5. Exit
Upon program exit, the VSP completes the appropriate program exit(s) and submits a VSP HMIS Update Form via secure fax. The HMIS Lead then updates the client record and removes the client from the Community Queue, if applicable.
-

7.3 CONFIDENTIALITY AND DATA ENTRY PROTOCOLS

- PII must never be entered into HMIS by a VSP agency.
 - Case notes and assessments must exclude names, shelter names, email addresses, or any other identifying information.
 - When required, ZIP Code fields should be entered as 00000.
-

- All communication with the HMIS Lead must use secure, approved channels.

MONTHLY CASE NOTES MUST INCLUDE:

- o Method and date of contact;
 - o Current sleeping location (described generally, e.g., “shelter”);
 - o Housing barriers;
 - o Current housing plan;
 - o Next planned contact date.
-

7.4 TRAINING AND SUPPORT

ALL VSP STAFF PARTICIPATING IN THIS WORKFLOW MUST:

- Complete VSP-specific HMIS New User Training;
 - Complete annual refresher training;
 - Sign and renew a User Agreement annually with the HMIS Lead Agency.
-

8. DATA ENTRY STANDARDS

This section defines minimum expectations for timeliness, accuracy, and documentation when entering client data into the HMIS. These standards apply to all Participating Agencies and HMIS Users. Adhering to data entry best practices supports system performance, coordinated entry effectiveness, and the delivery of high-quality services to clients.

8.1 TIMELINESS OF DATA ENTRY

To ensure data quality and system usefulness, client data must be entered into HMIS within the following timeframes:

Emergency Shelter	Within 3 business days of entry and exit
RRH/Prevention	Within 3 business days of enrollment
Permanent Housing (PSH, TH)	Within 3 business days of enrollment and housing move-in
Street Outreach/SSO	Within 3 business days of engagement or enrollment

As a general target, agencies are expected to enter more than 50% of project data within 0–3 days. Agencies with a significant percentage of records delayed beyond 10 business days may be contacted by the HMIS Lead for technical assistance or support.

8.2 ENROLLMENT, EXIT, AND HOUSING MOVE-IN

KEY DATE FIELDS MUST BE COMPLETED AS FOLLOWS:

- Enrollment Date – Reflects the date the client began receiving services or was formally enrolled in the program. (Not the move-in date for housing programs.)
- Exit Date – Reflects the last day the client received services or was known to be active in the program.
- Housing Move-In Date – For permanent housing projects, this is the first night the client physically slept in the unit. (Not the lease signing date.)

In cases where housing has not yet been located, agencies should still complete the program enrollment within the expected timeframe. Once the housing move-in date becomes known, it must be entered promptly. Any delays in documentation should be clearly explained in case notes.

Accurate housing dates affect System Performance Measures (SPMs) as outlined in 24 CFR § 578.7(b)(5).

8.3 ASSESSMENTS, NOTES, AND SERVICES

DOCUMENTATION STANDARDS INCLUDE:

- Required assessments must be completed at project entry and updated annually, or more frequently if required by project type or funding source. This includes HUD-mandated entry/exit assessments, Coordinated Entry assessments (if applicable), and any program-specific assessments required for housing eligibility or services
- Services and case notes must be entered promptly as services are provided.
- At a minimum, monthly case notes are expected for all active clients engaged in ongoing services or housing placement.
- Notes must be professional, factual, and free from judgmental or inappropriate language.

8.4 COMMON DATA ENTRY ISSUES AND QUALITY TARGETS

THE FOLLOWING ISSUES FREQUENTLY IMPACT DATA QUALITY:

- Missing or invalid dates (e.g., exit before entry)
- Incomplete or placeholder responses (e.g., “Unknown,” “Baby Girl”);
- Repeated use of “Client Doesn’t Know,” “Client Prefers Not to Answer,” or “Data Not Collected;”
- Missing or inaccurate destination at program exit;
- Duplicate client records or enrollments.

Agencies are encouraged to maintain an average data error rate of $\leq 5\%$ for HUD-required reports. The HMIS Lead Agency will provide technical assistance and training to help agencies improve data quality as needed.

9. PRIVACY, CONSENT, AND CONFIDENTIALITY

The KS-502 Continuum of Care prioritizes the protection of client information through robust privacy, consent, and confidentiality protocols. These policies ensure compliance with federal law and promote trust between clients, providers, and system administrators.

9.1 REGULATORY BASIS

PER 24 CFR § 578.7(A)(8), THE COC MUST ENSURE THAT THE HMIS:

- Protects client privacy;
- Ensures data confidentiality;
- Provides informed consent;
- Limits access to personally identifying information (PII) based on need-to-know principles.

The HMIS must also meet or exceed the privacy requirements established in the 2004 HMIS Data and Technical Standards Final Notice and any subsequent HUD updates.

9.2 CLIENT CONSENT

All clients must be offered a Client Acknowledgment of Services (CAS) and Release of Information (ROI) form prior to the entry of any personal data into HMIS.

CONSENT REQUIREMENTS:

- One adult household member must sign the CAS/ROI on behalf of the household; if they are unable to sign, verbal consent may be collected and staff may sign on their behalf.
- The form must clearly explain:
 - o What data will be collected;
 - o Why the data is being collected;
 - o With whom it may be shared (if applicable).
- Consent is voluntary. Services cannot be denied solely based on a client's decision not to share data.

IF A CLIENT REFUSES OR REVOKES CONSENT:

- A de-identified profile may be created using a numeric or alias identifier;
- This allows continued service provision and reporting without storing PII.

Signed forms must be uploaded to the "CE Fake" profile in Clarity within 3 business days. United Way of the Plains will update the household's live profile within 1 business day.

9.3 PRIVACY NOTICE

PARTICIPATING AGENCIES MUST PROMINENTLY DISPLAY THE CURRENT NOTICE TO CLIENTS OF USES AND DISCLOSURES IN ALL CLIENT INTAKE AREAS AND PROVIDE COPIES UPON REQUEST. THIS NOTICE OUTLINES:

- What HMIS is and why client information is collected;
- How personal information may be used or disclosed, with or without consent;
- The client's rights to access, amend, or restrict their HMIS data;
- The legal obligations of Participating Agencies to protect confidentiality.

The most recent version, updated June 26, 2025, reflects HUD’s privacy standards and KS-502 implementation practices.

9.4 CONFIDENTIALITY STANDARDS

ALL HMIS USERS MUST FOLLOW THESE CONFIDENTIALITY PROTOCOLS:

- Do not share HMIS data unless permitted by client written consent or required by law (e.g., court order, mandatory reporting of abuse or neglect, or audits by authorized federal programs);
- Do not export, print, or store HMIS data on unencrypted or personal devices;
- Secure all workstations and devices with password protection and auto-lock;
- Immediately report any suspected or actual data breach to:
hmistech@unitedwayplains.org

Access to client records is restricted to users with a legitimate need for service delivery, reporting, or administrative review. Policy violations may result in account suspension or permanent removal.

9.5 SPECIAL POPULATIONS AND EXCEPTIONS

MINORS: Consent from a parent or legal guardian is required unless exempted by law.

VICTIM SERVICE PROVIDERS (VSPs): VSPs must follow a de-identified workflow and may not enter PII into HMIS (see Section 7).

DE-IDENTIFIED CLIENTS WITHOUT CONSENT: Clients who decline or revoke consent will still receive services through alias profiles that exclude PII.

AGGREGATED/MASKED DATA: May be used for reporting or planning without breaching client confidentiality.

10. SECURITY STANDARDS AND PROTOCOLS

All users, agencies, and system administrators must comply with strict data security protocols to protect client information and system integrity. These standards are based on the HMIS Data and Technical Standards Final Notice (2004), updated HUD guidance, and local system practices.

10.1 ACCESS CONTROL AND USER SECURITY

- Each user must have their own unique username and password;
 - Passwords must be changed every 180 days;
 - The system allows 4 failed login attempts before lockout;
 - Locked accounts will remain inaccessible for 2 hours, unless reset by the HMIS Administrator during business hours;
 - Users must log into HMIS at least once every 30 days to keep their account active;
 - Agencies must notify the HMIS Lead within 1 business day when a user leaves or changes roles.
-

10.2 DEVICE AND NETWORK SECURITY

- HMIS must only be accessed from authorized, secure workstations;
 - Computers must have:
 - Antivirus protection;
 - Password-protected login;
 - Auto-lock enabled after 10 minutes of inactivity or less;
 - Agencies must ensure their internet networks and routers are secure and encrypted.
-

10.3 PHYSICAL AND ADMINISTRATIVE SAFEGUARDS

- HMIS User Agreements must be signed annually and kept on file;
 - Printed HMIS materials must be stored in locked cabinets when not in use;
 - Any printed or hard copy reports must be destroyed securely when no longer needed.
-

10.4 INCIDENT REPORTING AND BREACHES

All suspected or confirmed security breaches must be reported immediately to the HMIS Lead Agency at hmistech@unitedwayplains.org.

THIS INCLUDES:

- Unauthorized access;
- Lost or stolen devices used to access HMIS;
- Accidental disclosure of PII;
- User impersonation or password sharing.

THE HMIS ADMINISTRATOR WILL FOLLOW A STANDARD RESPONSE PROTOCOL, INCLUDING:

- Investigating the incident;
- Locking impacted user accounts;
- Notifying affected agencies (and clients, if applicable);
- Documenting the breach and mitigation steps.

10.5 AUDITS AND MONITORING

The HMIS Lead Agency conducts periodic audits to ensure adherence to security standards.

THIS MAY INCLUDE:

- Reviewing user activity logs;
- Validating device compliance;
- Spot-checking agency-level protocols;
- Conducting interviews or spot audits during monitoring visits.

Audit results may be shared with the agency and retained per the recordkeeping requirements of 24 CFR § 578.103.

11. DATA QUALITY AND MONITORING

High-quality data is essential for system-wide coordination, accurate reporting, funding compliance, and informed decision-making. Participating Agencies are responsible for entering accurate, complete, and timely data. The HMIS Lead Agency and HMIS & Data Committee oversee monitoring and quality assurance in accordance with federal expectations under 24 CFR § 578.7(b)(5).

11.1 DATA QUALITY OBJECTIVES

PARTICIPATING AGENCIES MUST AIM TO MEET THE FOLLOWING MINIMUM STANDARDS:

- *TIMELINESS*: Data is entered within the required timeframe based on project type (see Section 8);
- *ACCURACY*: Data reflects the client’s actual situation and is verified during intake or service delivery;
- *COMPLETENESS*: Required fields are filled out with as few “Client Doesn’t Know,” “Client Prefers Not to Answer,” or “Data Not Collected” responses as possible;
- *CONSISTENCY*: Information such as names, dates, SSNs, and program types are entered in standardized formats.

Agencies are encouraged to maintain a <5% error rate in HUD APRs and LSA submissions, excluding VSPs and de-identified profiles.

11.2 MONITORING AND REVIEW PROCESS

THE HMIS LEAD AGENCY CONDUCTS ROUTINE AND TARGETED DATA REVIEWS TO ASSESS:

- Required data element completion;
- Program enrollment and exit accuracy;
- VI-SPDAT scoring completion (if applicable);
- Coordinated Entry activity and follow-up;
- Errors or warnings flagged in HUD reports.

MONITORING MAY INCLUDE:

- Remote or in-person audits;
- Participation in data correction campaigns (e.g., LSA reviews);
- Technical assistance and support as needed.

Findings may be reviewed by the HMIS & Data Committee and may result in recommendations for retraining, corrective action, or workflow improvements.

11.3 PARTICIPATING AGENCY RESPONSIBILITIES

AGENCIES MUST:

- Designate a Data Quality Contact or internal HMIS Officer;
 - Regularly run internal data quality reports;
 - Review and correct flagged errors (e.g., missing destination, invalid DOB);
 - Ensure proper client exit documentation and exit reasons;
 - Maintain up-to-date staff lists and active HMIS accounts.
-

11.4 CASE CONFERENCING AND COORDINATED ENTRY OVERSIGHT

Case conferencing is a central data quality and engagement strategy within KS-502 Coordinated Entry. Participating Agencies must:

- Attend case conferencing meetings as applicable based on project type and queue participation;
- Prepare updated information on client status, engagement, and barriers;
- Adhere to confidentiality standards and sign the Case Conferencing Code of Ethics or HMIS User Agreement;
- Submit updates for clients placed on the Community Queue on a regular basis.

Each participating Agency should send representatives who are actively engaged in direct client service and possess the most current, relevant information about housing barriers, service needs and available resources. These individuals are critical to meaningful case conferencing and to maintaining accurate system-level records in HMIS.

Case conferencing protocols and responsibilities are outlined in Appendix B: Case Conferencing Policy

11.5 REPORTING COMPLIANCE

PARTICIPATING AGENCIES MUST CONTRIBUTE TO ALL MANDATORY REPORTING EFFORTS, INCLUDING BUT NOT LIMITED TO:

- Annual Performance Reports (APRs);
- Consolidated Annual Performance and Evaluation Reports (CAPERs);
- Point-in-Time (PIT) Count and Housing Inventory Count (HIC);
- Longitudinal System Analysis (LSA);
- Other CoC- or funder-requested data exports.

Failure to participate or correct reporting errors in a timely manner may result in notice from the HMIS Lead Agency and/or recommendations to the Data Committee.

12. HMIS REPORTING

The HMIS Lead Agency is responsible for producing, submitting, and supporting a wide range of HUD-mandated and CoC-requested reports. Participating Agencies are required to maintain timely, accurate data to ensure reporting is complete, compliant, and actionable.

12.1 FEDERAL REPORTS

THE FOLLOWING REPORTS ARE REQUIRED BY HUD AND MUST BE SUBMITTED USING HMIS DATA:

- *ANNUAL PERFORMANCE REPORT (APR)* – Required for all CoC-funded projects
- *CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)* – Required for ESG-funded projects
- *LONGITUDINAL SYSTEMS ANALYSIS (LSA)* – Submitted annually via HDX 2.0; evaluates system-wide performance
- *SYSTEM PERFORMANCE MEASURES (SPMs)* – Tracks CoC-wide progress on reducing homelessness using seven HUD-defined metrics
- *POINT-IN-TIME COUNT (PIT) AND HOUSING INVENTORY COUNT (HIC)* – Annual census and bed/unit inventory
- *COORDINATED ENTRY DATA SUBMISSIONS* – Used by HUD and local partners to evaluate CE access, prioritization, and outcomes
- Other HUD-mandated data exports or summaries as applicable

Reference: 24 CFR § 578.7(b)(5) and § 578.103 (performance measurement and recordkeeping).

12.2 CoC AND LOCAL REPORTS

The HMIS Lead Agency also generates reports to support community planning, CoC operations, and internal evaluation.

THESE MAY INCLUDE:

- Agency-level dashboards showing enrollments, exits, and data quality trends.
- Community performance summaries shared with the HMIS & Data Committee.
- CE Queue snapshots and matching activity reports.
- Ad hoc reports requested by the Governing Board, funders, or working groups.

Custom reports or data exports may be requested by submitting a written request to hmistech@unitedwayplains.org. Additional documentation or context may be requested for clarification.

12.3 PARTICIPATING AGENCY RESPONSIBILITIES

PARTICIPATING AGENCIES MUST:

- Enter data in a timely, complete, and accurate manner to support federal reporting deadlines.
- Review draft APRs, CAPERs, or other reports for accuracy prior to submission.
- Respond promptly to data correction requests during LSA or SPM preparation.
- Notify the HMIS Administrators of any new project starts, program closures, or grant renewals.
- Participate in HUD or CoC validation exercises when requested.

Agencies that consistently submit late or inaccurate data may be required to complete additional technical assistance or quality assurance follow-up.

12.4 REPORT STORAGE AND ACCESS

TO PROTECT PRIVACY AND COMPLY WITH FEDERAL RECORDKEEPING STANDARDS:

- Reports containing client-level data must be stored securely, encrypted, and retained in accordance with 24 CFR § 578.103.
 - Reports that include PII may not be shared externally without prior written approval from the HMIS Administrator.
 - Reports containing another agency's data may not be run, viewed, or distributed without written approval from both the owning agency and the HMIS Administrator.
 - Historical reports must be requested through the HMIS Administrator and are subject to the same confidentiality protocols.
-

13. GOVERNANCE AND COMPLIANCE

The HMIS governance structure for KS-502 is designed to ensure compliance with federal regulations, support transparent decision-making, and uphold the integrity of the Homeless Management Information System (HMIS). Governance activities are based on 24 CFR § 578.7(b) and local practices outlined in the Coalition’s Governance Charter.

13.1 GOVERNANCE STRUCTURE

HMIS governance responsibilities are shared among the following entities:

CoC GOVERNING BOARD

- Oversees HMIS performance and alignment with CoC goals
- All applicants, including current committee members seeking renewal, must submit applications annually and are elected by the Coalition Voting Membership

HMIS & DATA COMMITTEE (DATA SUBCOMMITTEE)

- Holds final authority on HMIS policy adoption
- Reviews and recommends updates to HMIS Policies and Procedures
- Evaluates data quality reports and agency compliance
- Uses HMIS Agency Application and Eligibility Rubric results to inform technical assistance, monitoring priorities, and any needed Corrective Action Plans
- Reviews new HMIS agency applications and associated Eligibility Rubric results and provides recommendations to the HMIS Lead Agency and Governing Board, as appropriate;
- Facilitates user feedback and system improvement discussions
- Reports findings and recommendations to the Governing Board

HMIS LEAD AGENCY (UNITED WAY OF THE PLAINS)

- Administers daily HMIS operations
 - Provides training, technical support, and system configuration
 - Submits reports to HUD and the CoC
 - Manages agency onboarding, user accounts, and compliance monitoring
-

13.2 INTERAGENCY NETWORK DATA SHARING AGREEMENT AND AGENCY RESPONSIBILITIES

Each Participating Agency must maintain an active Interagency Network Data Sharing Agreement with the HMIS Lead Agency, as outlined in Appendix D. This agreement establishes the terms and conditions for accessing and contributing data to the KS-502 Homeless Management Information System (HMIS).

THE AGREEMENT DEFINES:

- Agency responsibilities related to HMIS participation, including training, data quality, and privacy standards
- User authorization and role expectations
- Security and confidentiality requirements
- Procedures for support, monitoring, and enforcement

The Interagency Network Data Sharing Agreement must be reviewed and renewed as required by the HMIS Lead Agency. Agencies without an active agreement may not access HMIS.

13.3 COMPLIANCE MONITORING AND CORRECTIVE ACTION

THE HMIS LEAD AGENCY MONITORS COMPLIANCE WITH HMIS POLICIES AND PROCEDURES THROUGH:

- Routine data quality audits
- User activity log reviews
- System error reports (e.g., LSA, APR validations)
- Security incident analysis

WHEN NONCOMPLIANCE IS IDENTIFIED, THE HMIS ADMINISTRATOR MAY:

- Provide technical assistance or targeted retraining
- Issue a formal notice of deficiency
- Temporarily restrict or suspend HMIS access

Repeated, serious, or unaddressed violations may be referred to the HMIS & Data Committee for further action, including potential removal from system participation.

13.4 ANNUAL REVIEW AND REPORTING

The HMIS Lead Agency must provide the HMIS & Data Committee and CoC Voting Membership with:

- An annual review of HMIS operations and governance
- A summary of agency participation, data quality, and training compliance
- Updates on system enhancements, vendor coordination, and future planning priorities

These reports promote transparency, support strategic oversight, and guide HMIS development in alignment with HUD expectations and local needs.

14. WHISTLEBLOWER AND COMPLAINT POLICY

To maintain high standards of ethics and data integrity, the KS-502 Continuum of Care encourages individuals to report suspected misuse of the Homeless Management Information System (HMIS), violations of privacy or data security, and any unethical conduct related to HMIS participation.

THIS POLICY APPLIES TO:

- HMIS end users, staff, and administrators;
 - Board members and committee participants;
 - Agency leadership and volunteers;
 - Clients and community members.
-

14.1 REPORTING RESPONSIBILITIES

REPORTING RESPONSIBILITIES

This section applies specifically to the *HMIS Policies and Procedures document*. It is intended to provide a safe, respectful, and transparent process for raising concerns related to HMIS participation and the implementation of this policy, without implying wrongdoing on the part of any individual or organization.

Any person who becomes aware of, or has reasonable concern about, matters involving HMIS data use, privacy, security, or adherence to these Policies and Procedures is encouraged to share those concerns.

Examples may include:

- Potential or unintentional disclosure of client information;
- Questions about the appropriate use of HMIS data or system access;
- Concerns regarding housing prioritization processes or queue management;
- Concerns about interactions or behaviors connected to HMIS participation that may require review;
- Potential inaccuracies, data entry errors, or reporting discrepancies.

Concerns may be submitted directly to:

Email: HMISTech@unitedwayplains.org

Phone: (316) 267-1321 ext. 4171

Reports may also be submitted anonymously in writing via the HMIS Feedback or Complaint Form (see Appendix F). *All concerns will be reviewed by the HMIS Lead Agency for initial validation. Validated concerns will be referred to the HMIS & Data Committee (Data Subcommittee) for formal review and recommendations.*

14.2 INVESTIGATION AND RESOLUTION

The HMIS Lead Agency (United Way of the Plains) will promptly review all submissions and route complaints to the HMIS & Data Committee (Data Subcommittee) for formal review and resolution. The committee will document findings and provide recommendations to the HMIS Lead Agency and/or CoC Governing Board as needed.

- Document all findings and recommended actions;
 - Maintain confidentiality to the extent possible;
 - Provide updates or outcomes when appropriate;
 - Take corrective or disciplinary action if warranted.
-

14.3 NO RETALIATION

No individual who makes a good-faith report shall be retaliated against or penalized. This includes protections for HMIS users, clients, and agency staff. Knowingly false reports, however, may result in consequences up to and including account suspension or disciplinary review.

15. POLICY AMENDMENT AND REVIEW PROCESS

This section outlines how the HMIS Policies and Procedures document is maintained, updated, and approved, ensuring alignment with federal regulations, local governance, and evolving system needs.

15.1 ANNUAL REVIEW

The HMIS Policies and Procedures must be reviewed at least once annually by the HMIS & Data Committee, in collaboration with the HMIS Lead Agency.

THE ANNUAL REVIEW MUST INCLUDE:

- Updates to HUD regulations (e.g., changes to 24 CFR Part 578)
- Revisions to the HUD HMIS Data Standards Manual
- Modifications to workflows, roles, or participation requirements
- Feedback from HMIS users, Participating Agencies, or the CoC Governing Board

Following committee review, the revised document must be submitted to the CoC Governing Board for approval, as required by 24 CFR § 578.7(b)(5).

15.2 INTERIM UPDATES

IN ADDITION TO THE ANNUAL REVIEW, THE HMIS LEAD AGENCY MAY ISSUE INTERIM POLICY UPDATES WHEN:

- HUD releases new data collection or privacy guidance
- The CoC adopts new performance targets or Coordinated Entry policies
- HMIS software functionality changes (e.g., system upgrades from Bitfocus)
- Legal, security, or vendor-driven requirements arise

Interim changes may be made with HMIS & Data Committee approval and must be documented and distributed to all Participating Agencies. All updates will be incorporated into the next full revision.

15.3 NOTIFICATION AND VERSION CONTROL

- All Participating Agencies will be notified of revisions via email
 - The HMIS Lead Agency will maintain a version-controlled archive of previous editions
 - The current approved version of this document will be posted to the HMIS section of the United Way of the Plains website and shared after HMIS trainings
-

15.4 AMENDMENT RECORD

Date	Revision Summary	Approved By
[MM/DD/YYYY]	Initial release	HMIS & Data Committee
[MM/DD/YYYY]	Updated to reflect FY2024 Data Standards	HMIS & Data Committee

16. DEFINITIONS AND GLOSSARY

This section defines key terms used throughout the Kansas CoC HMIS Policies and Procedures. Definitions are drawn from 24 CFR § 578.3, the HMIS Data Standards Manual, and KS-502 system practices.

APR (Annual Performance Report)

A HUD-required report for all Continuum of Care (CoC)-funded projects that summarizes program-level data from HMIS over a 12-month period. Submitted through Sage.

Bitfocus / Clarity Human Services

The HMIS software platform used by the KS-502 Continuum of Care, developed and maintained by Bitfocus, Inc.

CAPER (Consolidated Annual Performance and Evaluation Report)

A report required for ESG-funded programs that evaluates outcomes and service delivery using HMIS data. Submitted annually to HUD.

CE (Community Queue)

The prioritized list of eligible clients in Coordinated Entry who are awaiting referral to permanent housing resources. Placement is based on assessment scores and system prioritization policies.

CE Event

A tracked interaction in HMIS that documents client progress in Coordinated Entry, including referrals, denials, and housing placements. Required for HUD performance reporting.

Client Acknowledgment of Services (CAS)

A local intake and consent form that informs clients about HMIS data collection, privacy, and their rights.

Client De-identified Profile

An HMIS record created without personally identifying information (PII), typically used for referrals involving Victim Service Providers (VSPs) or clients who decline consent.

Client Unique Identifier (UID)

A system-generated numeric code that uniquely identifies a client in HMIS while protecting personally identifying information (PII). Often used in internal communication and help desk tickets.

CoC Governing Board

The primary oversight body for the KS-502 CoC. Holds authority for HMIS designation and system performance oversight.

Coordinated Access Specialist

A trained HMIS user granted broader system access to support Coordinated Entry functions, including conducting assessments, managing referrals, tracking client progress through the housing queue, and collaborating across agencies. These users may view or edit client records beyond their home agency when performing designated CE activities and must adhere to enhanced confidentiality protocols.

Coordinated Entry (CE)

A standardized system for assessing, prioritizing, and referring people experiencing homelessness to appropriate housing resources based on need.

Corrective Action Plan (CAP)

A formal document outlining an HMIS compliance issue, required corrective steps, responsible parties, and timelines. Issued by the HMIS Lead or in collaboration with the HMIS & Data Committee.

Data Not Collected

A standardized HUD data response indicating that a required data element was not obtained. Frequent use can reduce data quality and affect reporting.

Data Quality

A measure of the accuracy, completeness, timeliness, and consistency of HMIS data. Maintained through audits, reporting, and agency review.

Engagement Date

A required data field (especially for Street Outreach projects) marking the first time a client agreed to accept services. Distinct from the date of first contact.

HIC (Housing Inventory Count)

An annual HUD-mandated count of all beds and units dedicated to homeless populations within the CoC, conducted at the same time as the PIT Count.

HMIS & Data Committee (Data Subcommittee)

A CoC Advisory Group responsible for reviewing and approving policies, monitoring data quality, and representing Participating Agency feedback.

HMIS Lead Agency

The organization designated by the CoC to oversee and administer the HMIS. For KS-502, this is United Way of the Plains.

Homeless Management Information System (HMIS)

The local data system used to collect, manage, and report information on homelessness services, as required under 24 CFR § 578.7.

Interagency Network Data Sharing Agreement

The formal agreement between the HMIS Lead Agency and each Participating Agency outlining responsibilities for system participation, data sharing, privacy, and compliance. Required for all agencies accessing HMIS. See Appendix D.

LSA (Longitudinal Systems Analysis)

An annual report submitted to HUD that analyzes CoC-wide system performance over multiple years, using de-identified HMIS data exported through HDX 2.0.

Personally Identifying Information (PII)

Any information that can be used to distinguish or trace an individual's identity, such as name, Social Security Number, date of birth, or address.

PIT (Point-in-Time Count)

An annual HUD-mandated census of people experiencing homelessness on a single night in January, including both sheltered and unsheltered individuals.

Program-Specific Data Elements (PSDEs)

Data fields required based on project type and funding source, as defined in the HUD HMIS Data Standards Manual.

SSVF (Supportive Services for Veteran Families)

A VA-funded program providing supportive services and rapid re-housing assistance to very low-income veterans and their families who are homeless or at risk.

System Performance Measures (SPMs)

A set of seven metrics defined by HUD to evaluate a CoC's effectiveness in reducing and ending homelessness.

User Agreement

A document signed by all HMIS users affirming their understanding of confidentiality, data entry expectations, and system responsibilities.

VAWA (Violence Against Women Act)

Federal legislation that mandates privacy protections for survivors of domestic violence, dating violence, sexual assault, and stalking. VSPs operating under VAWA have additional HMIS restrictions.

VI-SPDAT (Vulnerability Index – Service Prioritization Decision Assistance Tool)

A standardized tool used to assess the vulnerability of individuals and households experiencing homelessness. Used to support prioritization in Coordinated Entry.

VSP (Victim Service Provider)

An agency whose primary mission is to provide services to survivors of domestic violence, trafficking, or similar crimes. VSPs are prohibited from entering PII into HMIS and must follow a de-identified data process.

Appendix A: Notice to Clients of Uses and Disclosures

This notice explains how client data is used, shared, and protected within the KS-502 Homeless Management Information System (HMIS), in accordance with HUD standards and federal law.

Official version available at: [INSERT FINAL LINK]

A reference copy is included on the following page. This version is for review only and is not valid for signature

Notice to Clients of Uses & Disclosures

Coalition to End Homelessness in Wichita/Sedgwick County
(KS-502 – Wichita/Sedgwick County Continuum of Care)

ATTENTION: This notice describes how information about you may be used and disclosed to 3rd parties and how you may access that information.

WHAT IS THE COALITION TO END HOMELESSNESS IN WICHITA/SEDGWICK COUNTY HMIS?

With your permission, _____, hereinafter called "this Agency," enters information about you into a shared computer database called the Homeless Management Information System (HMIS). HMIS is used by social services agencies within Sedgwick County to share client-level data and provide referrals to housing and other services. The system is a project of the Coalition and administered by the HMIS Lead Agency in collaboration with the Coalition. Sharing your Personal Identifiable Information within the HMIS is voluntary and not contingent on service delivery. However, your participation, although optional, is a critical component of our community's ability to provide the most effective services and housing.

WHY IS INFORMATION ABOUT YOU COLLECTED IN HMIS?

- To provide individualized case management and help make sure you get services you need.
- To coordinate services through case conferencing with other providers in the community who are helping you work toward housing or stability.
- To provide referrals to agencies who can provide different or specialized services without needing to reshare all your information.
- To help us better understand the people we serve and their needs and develop new services to meet any unmet needs.
- To better assess what services may be available to you.
- To ensure that your needs, and the needs of others in our community, were met.
- To improve the quality of care and service for homeless individuals and families.

HOW CAN INFORMATION ABOUT YOU BE USED OR DISCLOSED WITHOUT YOUR SPECIFIC WRITTEN CONSENT?

Unless restricted by other laws, your information can be used or disclosed to the following without your specific written consent:

Data that identifies you may be used or shared with:

- Authorized staff of this Agency for service coordination, billing, or funding purposes;
- Auditors or other oversight personnel who review the work of this Agency;
- HMIS Administrators who maintain the data system and may view information during system setup, maintenance, or support;
- Government or social service agencies required by law to receive reports of abuse, neglect, or domestic violence;
- Individuals able to prevent or reduce a serious and immediate threat to health or safety, including the intended target of a threat;
- Coroners, medical examiners, or funeral directors carrying out their legal responsibilities;
- Authorized federal officials conducting national security or protective services operations;
- Law enforcement officials, to the extent required by state or local law;
- Agencies that have agreed to the Coalition's Interagency Agreement for HMIS, including those who join after you give your consent to share information.

Notice to Clients of Uses & Disclosures
Coalition to End Homelessness in Wichita/Sedgwick County
Last Reviewed and Approved: 7.17.2025

Data that does not identify you may be used or shared with:

- Staff from sponsoring organizations—such as United Way of the Plains, the Coalition to End Homelessness in Wichita/Sedgwick County, or the U.S. Department of Housing and Urban Development—and other authorized individuals conducting research or evaluating services.
Your name, Social Security number, contact information, or any personally identifying details will not appear in any reports or research outputs.

All other uses and disclosures require your written consent.

You may cancel your consent at any time by submitting a written request to the address listed at the end of this notice. Until your consent is revoked, your information may continue to be used or shared as described above.

WHAT RIGHTS DO YOU HAVE REGARDING YOUR INFORMATION?

- You have the right to receive a copy of the information that we maintain about you in the Coalition to End Homelessness in Wichita/Sedgwick County (except for information compiled in reasonable anticipation of or for use in a legal proceeding).
- You also have the right to update information about you when the information in the record is inaccurate.
- You have the right to receive a list of people who have seen your protected personal data for up to five years prior to your request for that information. However, you do not have the right to a list of disclosures for national security or intelligence purposes or to correctional institutions or law enforcement officials or if required by law or requested for certain health oversight purposes.
- You can exercise your rights as listed above by making a written request to this Agency or to the HMIS Lead Agency, listed at the end of this notice.

ENFORCEMENT OF YOUR PRIVACY RIGHTS:

If you believe your privacy rights have been violated, you may send a written complaint to this Agency. If your complaint is not resolved to your satisfaction, you may send your written complaint to the HMIS Lead Agency. Retaliation against you for filing a complaint is illegal.

This Agency, and all HMIS Participating Agencies, are required by law to maintain the privacy of your protected personal information, and to display copies of the most recent Notice to Clients of Uses and Disclosures and a list of Participating Agencies in the Interagency Network Data Sharing Agreement.

The Coalition to End Homelessness in Wichita/Sedgwick County reserves the right to change the Notice at any time. If it does, the change will retroactively affect all information in HMIS, not just the information entered after the change.

The revised Notice may be obtained by requesting in writing to either address listed below:

United Way of the Plains
C/o HMIS Administrator
245 N. Water St.
Wichita, KS 67202

If you have any questions about this Notice or need further information, you may request it from the HMIS Administrator: HMISTech@unitedwayplains.org.

Date Posted: _____

If this document was posted a year or more ago, please contact HMISTech@unitedwayplains.org for the most recent copy.

Notice to Clients of Uses & Disclosures
Coalition to End Homelessness in Wichita/Sedgwick County
Last Reviewed and Approved: 7.17.2025

Appendix B: Case Conferencing Code of Ethics and Guidance

This form outlines expectations for confidentiality, respectful collaboration, and client-centered practices during Coordinated Entry case conferencing. It must be signed by any participant not already covered by an HMIS User Agreement and renewed annually.

Official version available at: [INSERT FINAL LINK]

A reference copy is included on the following page. This version is for review only and is not valid for signature.

CASE CONFERENCING POLICY, RESPONSIBILITY STATEMENT, & CODE OF ETHICS

Coalition to End Homelessness in Wichita/Sedgwick County
(KS-502 – Wichita/Sedgwick County Continuum of Care)

PARTICIPANT POLICY

Partner agencies shall share information for the provision of services to homeless persons through a networked infrastructure that establishes electronic communication among the Partner Agencies known as HMIS (Homeless Management Information System). A key component of the provision of services involves case conferencing, a regular, ongoing meeting where key participants collaborate to address client needs and reduce barriers to housing. In most cases, conferencing participants are HMIS users and have signed the HMIS User Policy. However, individuals who are not HMIS users must complete this Case Conferencing Policy prior to participating and renew it annually if they continue to attend.

PARTICIPANT RESPONSIBILITY

_____(Initial) I understand that I am participating in case conferencing as a representative of a partner agency, and I am a key participant in service delivery for individuals experiencing homelessness.

_____(Initial) I understand that information that is provided during case conferencing is private and confidential and should not be discussed with others outside of the meeting or with anyone who is not an authorized HMIS user.

_____(Initial) I may only view, obtain, disclose, or use the HMIS data or information obtained during case conferencing in a manner that is necessary to perform my job.

_____(Initial) I understand that I may be asked to leave the case conferencing meeting of a particular client's case is not relevant to my role.

_____(Initial) When hard copies or printed case conferencing materials are no longer needed, they must be properly destroyed to maintain confidentiality.

_____(Initial) I will immediately report any suspected or observed security breaches to the HMIS Agency Administrator(s) at United Way of the Plains.

_____(Initial) I understand that failure to follow these requirements may result in loss of access to case conferencing participation.

CASE CONFERENCING CODE OF ETHICS

- Participants must treat Partner Agencies with respect, fairness, and good faith.
- Participants should maintain high standards of professional conduct during case conferencing.
- Participants must treat clients from other Partner Agencies with full professional consideration and respect.
- Participants must honor client preferences related to data sharing during case conferencing.

By signing below, I acknowledge that I have read, understand, and agree to observe the Case Conferencing Policy, Responsibilities, and Code of Ethics as described above.

Date:

Participant Signature

Printed Name

Case Conferencing Policy, Responsibility statement, & Code of Ethics
Coalition to End Homelessness in Wichita/Sedgwick County
Last Reviewed and Approved: 7.17.2025

Appendix C: HMIS User Agreement

This document outlines the expectations for any individual accessing the Homeless Management Information System (HMIS) as a User under a Participating Agency.

Official version available at: [INSERT FINAL LINK]

A reference copy is included on the following page. This version is for review only and is not valid for signature.

HMIS USER POLICY, RESPONSIBILITY STATEMENT, AND CODE OF ETHICS

Coalition to End Homelessness in Wichita/Sedgwick County
(KS-502 – Wichita/Sedgwick County Continuum of Care)

THIS DOCUMENT IS PROVIDED FOR REFERENCE ONLY.

All authorized Clarity HMIS users are required to review and accept the HMIS User Policy, Responsibility Statement, and Code of Ethics during their first login and again annually.
Consent and agreement are recorded digitally within the Clarity system. No signature is required on this form.

USER POLICY

Partner Agencies share information through HMIS to support the provision of services to persons experiencing homelessness. Each Partner Agency retains rights to the client data it enters and must honor any restrictions imposed by the client regarding the use of their information.

The client controls what information is shared and with whom. Sharing may only occur if the client has signed a valid Consent/Release of Information form.

Minimum required data entry for all consenting clients includes:

- Universal Data Elements
- Program-Specific Data Elements

HMIS is a tool to coordinate services and improve outcomes. Users must ensure data is accurate, complete, and entered in a timely manner to best serve clients.

USER RESPONSIBILITY

Initial each item below to confirm understanding and agreement:

- I will not share my HMIS credentials with anyone and will keep them secure.
- I understand that only authorized users and the client may view client data.
- I will access, use, and disclose HMIS data only as necessary to perform my job duties.
- I will log off or lock my screen whenever I leave a workstation unattended.
- I understand that unattended HMIS sessions can result in data breaches.
- I will store hard copies of HMIS data securely and destroy them when no longer needed.
- I will report any suspected or confirmed security breaches immediately to the HMIS Lead.

USER CODE OF ETHICS

- Treat all Partner Agencies and staff with respect and fairness.
- Maintain high standards of conduct in all HMIS-related duties.
- Prioritize the dignity and autonomy of each client.
- Show respect and consideration when working with clients from other agencies.
- Be prepared to answer client questions about HMIS and their rights.
- Accurately record and respect each client's information-sharing preferences.
- Allow clients to change their sharing preferences at any time.
- Never deny services based on a client's refusal to share or enter personal data in HMIS.

Acknowledgment of this policy is completed digitally within Clarity HMIS.

All users must review and accept the HMIS User Policy, Responsibility Statement, and Code of Ethics during their first login and annually thereafter. This copy is provided for reference only.

HMIS User Policy, Responsibility Statement, and Code of Ethics
Coalition to End Homelessness in Wichita/Sedgwick County
Last Amended and Approved: 07/17/2025

Appendix D: Interagency Network Data Sharing Agreement

This document outlines the agreement between the HMIS Lead Agency and Participating Agencies regarding participation in the KS-502 Homeless Management Information System (HMIS). It defines responsibilities related to data sharing, system access, user authorization, client privacy, and compliance monitoring.

Official version available at: [INSERT FINAL LINK]

A reference copy is included on the following page. This version is for review only and is not valid for signature.

Interagency Network Data Sharing Agreement

Coalition to End Homelessness in Wichita/Sedgwick County
(KS-502 – Wichita/Sedgwick County Continuum of Care)

1.0 INTRODUCTION AND PURPOSE

The Homeless Management Information System (HMIS) is a secure, computerized data system designed to capture client-level information over time on the characteristics and service needs of people experiencing homelessness in Sedgwick County, Kansas. The HMIS is administered by the Lead Agency, United Way of the Plains, in partnership with the Coalition to End Homelessness in Wichita/Sedgwick County (KS-502). It is used for purposes including complying with federal data collection standards, supporting effective client care and coordination, streamlining access to services, and improving Continuum of Care performance.

Participation in HMIS requires execution of this HMIS Memorandum of Agreement and Interagency Network Data Sharing Agreement (hereinafter, "Agreement"). Upon execution, the Participating Agency (PA) shall be granted access to HMIS and the Interagency Network Data Sharing system; shall have access to client records entered by its own Users; shall agree to share a standardized subset of client data with other PAs; and shall accept that future Participating Agencies may receive read-only access to globally shared client data, including data entered prior to their joining.

2.0 DEFINITIONS

For the purposes of this Agreement, the following definitions shall apply:

- "HMIS" refers to the Homeless Management Information System used by the KS-502 Continuum of Care.
- "HMIS Lead Agency" means United Way of the Plains, responsible for operating and administering the HMIS.
- "HMIS Administrator" refers to the Lead Agency staff responsible for system oversight, user support, training, and enforcement of HMIS policies.
- "System Administrators" include the HMIS Administrator, Associate Database Administrator, and Data Entry Clerk employed by the Lead Agency.
- "Participating Agency (PA)" means any organization that has executed this Agreement and is authorized to access HMIS and/or participate in the Data Sharing Network.
- "Executive Officer" means the individual authorized to sign this Agreement on behalf of a Participating Agency.
- "User" refers to any individual affiliated with a PA who has completed required training and is granted system access.
- "Client" means any individual receiving services whose information is entered into HMIS.
- "Client Consent" refers to documented, written permission to share personal data with other Participating Agencies.
- "CAS and Consent Form" refers to the standard consent form approved for network data sharing.
- "Notice of Uses and Disclosures" is the standard document explaining how client data may be used or shared.
- "HMIS Vendor" means Bitfocus, the contracted vendor responsible for hosting the HMIS database.
- "Embedded User Policy" refers to the user agreement governing confidentiality, safety, and data quality responsibilities.

3.0 ROLES AND RESPONSIBILITIES

The HMIS Lead Agency shall maintain the HMIS, provide user training and technical assistance, assign user access, and retain all executed Agreements.

The HMIS Administrator shall implement HMIS Policies and Procedures, verify training completion, and notify Participating Agencies of changes to forms, user access, or network membership.

Each Participating Agency shall comply with this Agreement and HMIS Policies and Procedures; ensure users are trained and authorized; maintain data quality; retain consent forms and executed agreements; and honor client-imposed data sharing restrictions. The Executive Officer of each PA shall authorize users, oversee agency compliance, and ensure annual submission of this Agreement.

Interagency Network Data Sharing Agreement
Coalition to End Homelessness in Wichita/Sedgwick County
Last Amended and Approved: 07/17/2025

4.0 CONFIDENTIALITY AND COMPLIANCE REQUIREMENTS

Participating Agencies shall comply with all applicable laws including HIPAA, 42 CFR Part 2, VAWA, ADA, the Ryan White CARE Act, and relevant Kansas privacy statutes.

Client data may be collected, used, and shared only as permitted by this Agreement and related policies. General releases are not sufficient; only the approved CAS and Consent Form or its equivalent is acceptable.

If a client revokes consent, the PA shall cease sharing data and notify the HMIS Administrator within one (1) business day. Revocation is not retroactive.

User credentials shall not be shared. Access is limited to individuals with a documented need. Violations may result in sanctions, up to and including termination of system access.

5.0 DATA SHARING AND CLIENT CONSENT

Participating Agencies may only share client data with documented, informed consent. Consent must be obtained using the CAS and Consent Form or an approved equivalent, and shall remain valid for five (5) years unless revoked.

The Notice of Uses and Disclosures must be provided or displayed wherever the CAS and Consent Form is completed. A verbal explanation must be offered, with accommodations for accessibility needs.

Clients may refuse to share data without penalty. Consent revocation shall be reported to the HMIS Administrator within one (1) business day. The HMIS Administrator will update the client file accordingly. Revocation shall not apply retroactively.

Data sharing restrictions imposed by the client shall be recorded in HMIS and honored by all PAs. No PA may share another agency's data or disclose information externally without express consent or unless fully de-identified and aggregated.

6.0 USE OF SHARED DATA BY PARTICIPATING AGENCIES

6.1 Participating Agencies shall access and use shared HMIS data solely for purposes directly related to client services, coordination of care, program administration, or federally required reporting.

6.2 Access shall be granted only to Users with a demonstrated need to view or manage shared data, including case managers, supervisors, data entry staff, or administrative personnel responsible for oversight of homeless services.

6.3 Each User's access role shall be assigned by the HMIS Administrator based on job function and shall limit the ability to view, edit, or delete client information in accordance with established access controls.

6.4 Participating Agencies shall not alter, edit, delete, or disclose any client data submitted by another agency without explicit authorization or as permitted under client consent.

6.5 Agencies may not share reports or data derived from other Participating Agencies unless such data is fully de-identified and aggregated, or written authorization has been obtained.

6.6 Agencies shall not run reports on programs or projects outside their own agency, except where explicitly permitted by the HMIS Lead Agency.

6.7 All use of shared data shall comply with this Agreement, the HMIS Policies and Procedures, and all applicable confidentiality standards. Unauthorized use may result in corrective action, including revocation of access.

7.0 USER ACCESS AND TRAINING

7.1 Participating Agencies shall designate Users who require HMIS access for the purpose of providing services, entering data, or performing administrative oversight.

7.2 Each User shall complete New User Training, basic confidentiality training, and any other required instruction as determined by the HMIS Administrator prior to being granted system access.

7.3 A completed User Setup Form shall be submitted to the HMIS Administrator for each new User. Access credentials will not be issued until training is verified.

7.4 User accounts are individual and non-transferable. Users shall not share their login credentials with any other individual under any circumstances.

Interagency Network Data Sharing Agreement
Coalition to End Homelessness in Wichita/Sedgwick County
Last Amended and Approved: 07/17/2025

7.5 Participating Agencies are responsible for monitoring user activity within their organization and must immediately report suspected misuse, security breaches, or violations of this Agreement.

7.6 The HMIS Administrator shall retain the right to suspend or revoke any User's access for violation of HMIS Policies and Procedures, failure to comply with training requirements, or breach of confidentiality.

8.0 TERMS, VIOLATIONS, AND TERMINATION

8.1 This Agreement shall remain in effect from the date of execution until terminated in accordance with the provisions below.

8.2 The Executive Officer of each Participating Agency shall review and re-execute this Agreement annually. The HMIS Administrator shall initiate the renewal process and retain all executed copies for a minimum of three (3) years.

8.3 A Participating Agency may terminate its participation by submitting written notice to the HMIS Administrator at least thirty (30) calendar days in advance. Notice shall be sent to: hmistech@unitedwayplains.org.

8.4 Upon termination, the HMIS Lead Agency and remaining Participating Agencies shall retain the right to access all client data previously entered by the terminating agency, subject to any client-imposed data sharing restrictions.

8.5 Participating Agencies shall not transfer or assign rights or obligations under this Agreement without prior written approval from the HMIS Lead Agency.

8.6 The HMIS Administrator may impose corrective action in response to violations of this Agreement, the HMIS Policies and Procedures, or applicable confidentiality requirements. Sanctions may include training requirements, suspension or termination of user access, or removal from the Data Sharing Network.

8.7 Any willful misuse of HMIS or disclosure of confidential information may result in immediate suspension of access and may subject the Participating Agency or User to further legal action.

8.8 This Agreement constitutes the full and complete understanding between the parties and supersedes all prior versions, proposals, or understandings, whether oral or written.

9.0 AGREEMENT AND SIGNATURES

By signing below, the Participating Agency agrees to the terms and conditions set forth in this HMIS Memorandum of Agreement and Interagency Network Data Sharing Agreement. This Agreement shall be executed by the Executive Officer authorized to act on behalf of the Participating Agency. The signed Agreement shall be retained by the HMIS Lead Agency for a minimum of three (3) years and made available upon request.

Participating Agency	
Agency Name (Printed):	
Executive Officer (Printed):	
Signature of Executive Officer:	Date:
Agency Address:	
HMIS Lead Agency: United Way of the Plains	
Signature of President/CEO:	Date:

Interagency Network Data Sharing Agreement
Coalition to End Homelessness in Wichita/Sedgwick County
Last Amended and Approved: 07/17/2025

PARTICIPATING AGENCIES

Homeless Management Information System (HMIS)

<https://sedgwick.clarityhs.com/>

Interagency Network Data Sharing Agreement Participating Agencies

Date: _____ Last Updated: _____

Participating Agency	Address	Phone
Breakthrough Episcopal Social Services	1010 N Main St, Wichita, KS 67203	316-269-2534
Catholic Charities, Inc. – Diocese of Wichita	437 N. Topeka, Wichita, KS 67202	316-264-8344
Children 1st	1165 Southwest Blvd, Wichita, KS 67213	316-633-1530
COMCARE of Sedgwick County	635 N Main, Wichita, KS 67203	316-660-7606
Department for Children & Families (DCF)	2601 S. Oliver, Wichita, KS 67210	316-337-7000
Family Promise of Greater Wichita	1111 St Francis, Wichita, KS 67214	316-977-7020
Healthy Blue	P.O. Box 61010, Virginia Beach, VA 23466	833-838-2593
HumanKind Ministries	829 N. Market, Wichita, KS 67214	316-264-9303
ICT SOS	126 S Ida St, Wichita KS 67211	316-440-0192
ICT Street Team	402 N. Topeka, Wichita, KS 67202	316-776-4170
Kansas Department of Aging and Disability Services – Behavioral Health Services	503 S. Kansas Ave., Topeka, KS 66603	785-296-3471
KU School of Medicine	1010 N Kansas Street, Wichita, KS 67214	316-293-2635
Mental Health America of South Central Kansas	555 N Woodlawn Ste. 3105, Wichita, KS 67208	316-685-1821
Miracles, Inc.	1015 E. 2nd Street, Wichita, KS 67214	316-303-9520
Passageways	2627 S Bennett Ave, Wichita, KS 67217	316-721-1316
Robert J. Dole VAMC – Homeless Services Department	5500 E. Kellogg Ave, Wichita, KS 67218	316-685-2221
Sedgwick County Dept. of Health and Human Services	934 N Main, Wichita, KS 67203	316-660-7670
Substance Abuse Center of Kansas, Inc.	731 N. Water, Suite 2, Wichita, KS 67203	316-267-3825
Stepstone	1329 S. Bluffview, Wichita, KS 67218	316-265-1611
The City of Wichita – Dept. of Housing and Community Services	455 N Main #10, Wichita, KS 67202	316-462-3700
The Salvation Army	350 N Market, Wichita, KS 67202	316-263-2769
Union Rescue Mission	2800 N. Hillside, Wichita, KS 67219	316-687-4673
United Methodist Open Door	402 E. 2nd Street, Wichita, KS 67201	316-265-9371
United Way of the Plains	245 N. Water, Wichita, KS 67202	316-267-1321
Wichita Children’s Home	7271 E. 37th St. N., Wichita, KS 67226	316-684-6581
Wichita Family Crisis Center	7824 E 32 nd St N., Wichita, KS 67226	316-263-7501
Wichita Police Department HOT (Homeless Outreach Team)	455 N Main, Wichita, KS 67202	316-854-3013

This Interagency Network Data Sharing Agreement is entered into on _____ (day/mo/yr) by the Direct Partner Agencies listed on this agreement. This executed Interagency Network Data Sharing Agreement shall establish a Data Sharing Network comprised solely of those Participating Agencies listed.

Interagency Network Data Sharing Agreement
Coalition to End Homelessness in Wichita/Sedgwick County
Last Amended and Approved: 07/17/2025

Appendix E: Corrective Action Plan (CAP)

This form is used to document and address instances of non-compliance with KS-502 HMIS Policies and Procedures. It outlines specific violations, required corrective actions, and expected timelines for resolution. The CAP may be issued by the HMIS Lead Agency or requested by the Continuum of Care as part of formal oversight or performance monitoring.

Official version available at: [INSERT FINAL LINK]

A reference copy is included on the following page. This version is for review only and is not valid for signature.

Corrective Action Plan (CAP)
 Coalition to End Homelessness in Wichita/Sedgwick County
 KS-502 – Wichita/Sedgwick County Continuum of Care

AGENCY CONTACT INFORMATION

(Please complete all sections. Contact HMISTech@unitedwayplains.org for assistance.)

Date of Notification: _____ Agency Name: _____
 Agency Administrator/ED: _____ HMIS Contact Person: _____
 Email: _____ Phone: _____

IDENTIFIED VIOLATION(S)

(Include a brief description of each issue. Reference the applicable section of the HMIS Policies and Procedures or HUD requirement.)

Violation	Applicable Policy/Standard
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____

CORRECTIVE ACTIONS REQUIRED

(Each issue above should have a corresponding corrective action, timeline, and expected outcome.)

Required Action	Expected Completion Date
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____

SUPPORT AND RESOURCES TO BE PROVIDED (IF ANY)

HMIS Lead Agency may provide technical assistance, training, reporting tools, or direct support as part of this CAP.

ACKNOWLEDGMENT AND AGREEMENT

By signing below, the agency affirms receipt of this Corrective Action Plan and agrees to complete the listed actions by the specified deadlines. The agency understands that unresolved issues may result in further administrative review or action as outlined in HMIS Policies and Procedures.

Agency Administrator / Director

Signature: _____
 Printed Name: _____
 Date: _____

HMIS Lead Representative

Signature: _____
 Printed Name: _____
 Date: _____

Corrective Action Plan
 Coalition to End Homelessness in Wichita/Sedgwick County
 Last Reviewed and Approved: 7.17.2025

Appendix F: HMIS Feedback and Complaint Form

This form may be used to submit concerns, complaints, or suggestions related to the operation, access, or administration of the KS-502 Homeless Management Information System (HMIS). It may be completed by system users, agency staff, or community members and may be submitted anonymously.

Official version available at: [INSERT FINAL LINK]

A reference copy is included on the following page. This version is for review only and is not valid for signature.

HMIS Feedback and Complaint Form KS-502 Homeless Management Information System (HMIS)

PURPOSE

This form may be used by HMIS users, agency staff, clients, or community members to submit concerns, complaints, or feedback related to KS-502 HMIS participation. Reports may include data quality issues, privacy concerns, technical problems, access concerns, or general suggestions. You may submit this form anonymously. Submissions are reviewed by the HMIS Lead Agency and shared with the HMIS & Data Committee (Data Subcommittee) for formal review and resolution, as appropriate. Retaliation for good faith reporting is prohibited.

1. Name (Optional): _____

2. Agency (if applicable): _____

3. What is your role?

- HMIS End User Case Manager or Outreach
 Client or Community Member Agency Administrator
 Other: _____

4. Type of concern or feedback:

- Data quality issue
 System misuse or user behavior
 Privacy or confidentiality concern
 HMIS access or permissions issue
 Program participation or case conferencing access concern
 Complaint about services or referral process
 Technical system issue
 General feedback or suggestion
 Other: _____

5. Describe your concern or feedback:

6. Have you reported this before?

- No
 Yes – To whom? _____

7. Would you like follow-up from the HMIS Team?

- Yes, please contact me
 No, thank you
Preferred contact (email or phone): _____

Submission Instructions

Submit this form to the HMIS Lead Agency via:

Email: hmistech@unitedwayplains.org

Mail or In Person:

United Way of the Plains – HMIS Administrator
245 N. Water St., Wichita, KS 67202

All complaints and concerns will be formally reviewed by the HMIS & Data Committee (Data Subcommittee) to ensure transparency and accountability. The HMIS Lead Agency will route relevant submissions to the committee and provide follow-up as needed.

HMIS Feedback and Complaint Form
Coalition to End Homelessness in Wichita/Sedgwick County
Last Reviewed and Approved: 7.17.2025

Appendix G: HMIS Agency Application (KS-502)

This form must be completed by any organization seeking to join the KS-502 Homeless Management Information System (HMIS) as a Participating Agency or requesting to add a new HMIS-participating project. It collects:

- *Basic agency and contact information;*
- *A description of programs and services proposed for inclusion in HMIS;*
- *Funding sources and target populations;*
- *Data privacy, security, and consent practices; and*
- *Technology capacity and staffing for HMIS participation.*

The completed HMIS Agency Application is reviewed by the HMIS Lead Agency and, as needed, the HMIS & Data Committee, using the HMIS Agency Eligibility Rubric (Appendix H). The application and rubric results together inform decisions to approve, conditionally approve, or deny HMIS participation and may identify areas for technical assistance.

Official version available at: [INSERT FINAL LINK]

A reference copy is included on the following page. This version is for review only and is not valid for signature.

HMIS NEW AGENCY APPLICATION FORM

COALITION TO END HOMELESSNESS IN WICHITA/SEDGWICK COUNTY
KS-502 – WICHITA/SEDGWICK COUNTY CONTINUUM OF CARE)

INSTRUCTIONS

Complete this form to request participation in the homeless management information system (HMIS).

After submission, the HMS lead will contact you for a brief interview.

The KS-502 data subcommittee will review your application and recommend approval, conditional approval, or denial.

Submitting this form does not guarantee approval.

SECTION A: AGENCY INFORMATION

A.1 – ORGANIZATION NAME: _____

A.2 – ORGANIZATION ADDRESS: _____

A.3 – PRIMARY PHONE: _____

A.4 – ORGANIZATION TYPE:

NONPROFIT GOVERNMENT TRIBAL OTHER: _____

A.5 – EXECUTIVE DIRECTOR NAME: _____

A.6 – EXECUTIVE DIRECTOR EMAIL: _____

A.7 – EXECUTIVE DIRECTOR PHONE: _____

A.8 – COUNTIES WHERE YOUR AGENCY PROVIDES SERVICES: _____

A.9 – DOES YOUR AGENCY CURRENTLY SERVE CLIENTS IN SEDGWICK COUNTY?

YES NO

A.10 – APPROXIMATELY WHAT PERCENTAGE OF YOUR CLIENTS ARE EXPERIENCING HOMELESSNESS OR HOUSING INSTABILITY?

<25% 25–50% >50%

A.11 – PRIMARY POPULATIONS SERVED (CHECK ALL THAT APPLY):

INDIVIDUALS FAMILIES YOUTH VETERANS OLDER ADULTS

BEHAVIORAL HEALTH / SUD EXPERIENCING HOMELESSNESS

AT RISK OF HOMELESSNESS OTHER: _____

A.12 – DOES YOUR AGENCY PARTICIPATE IN KS-502 COC ACTIVITIES?
(CHECK ALL THAT APPLY)

COC GENERAL MEETINGS COMMITTEES/WORKGROUPS

COORDINATED ENTRY CASE CONFERENCING

PIT COUNT NONE

A.13 – HAS YOUR AGENCY PREVIOUSLY SIGNED THE KS-502 INTERAGENCY NETWORK DATA SHARING AGREEMENT?

YES NO NOT SURE

HMIS New Agency Application

Coalition to End Homelessness in Wichita/Sedgwick County

Last Reviewed and Approved: 11/18/2025

SECTION B: SERVICE DESCRIPTION & OPERATIONAL PRACTICES

**B.1 – DESCRIBE THE SERVICES YOUR AGENCY PROVIDES TO CLIENTS IN SEDGWICK COUNTY.
(BRIEF DESCRIPTION: OUTREACH, CASE MANAGEMENT, HOUSING, NAVIGATION, HEALTH SERVICES, ETC.)**

B.2 – DESCRIBE HOW YOUR AGENCY VERIFIES A CLIENT’S HOUSING OR HOMELESS STATUS.

B.3 – DESCRIBE HOW YOUR AGENCY PROTECTS CLIENT PRIVACY AND PII.

B.4 – DO YOU HAVE AT LEAST ONE STAFF PERSON WHO CAN BE RESPONSIBLE FOR HMIS DATA ENTRY? IF YES, BRIEFLY EXPLAIN THEIR ROLE.

**B.5 – DO YOU CURRENTLY USE ANY SYSTEM (PAPER OR ELECTRONIC) TO RECORD CLIENT INFORMATION?
IF YES, BRIEFLY DESCRIBE:**

B.6 – WHY IS YOUR AGENCY REQUESTING ACCESS TO HMIS, AND HOW WILL IT SUPPORT YOUR WORK AND THE COMMUNITY?

SECTION C: HMIS ADMINISTRATIVE USE ONLY (TO BE COMPLETED BY HMIS LEAD)
Date Reviewed by Data Subcommittee: _____
Approved: <input type="checkbox"/> Yes <input type="checkbox"/> No
Appealed to Advisory Board? <input type="checkbox"/> Yes <input type="checkbox"/> No
Date of Appeal Review: _____
Final Approval: <input type="checkbox"/> Yes <input type="checkbox"/> No
Effective Date (if approved): _____ N/A if denied: <input type="checkbox"/>

HMIS New Agency Application
Coalition to End Homelessness in Wichita/Sedgwick County
Last Reviewed and Approved: 11/18/2025

Appendix H: HMIS Agency Eligibility Rubric (KS-502)

The HMIS Agency Eligibility Rubric provides a structured, repeatable method for assessing whether an agency is prepared to participate in the KS-502 Homeless Management Information System (HMIS) in a way that protects client privacy, supports accurate reporting, and aligns with CoC priorities.

The rubric scores agencies across domains such as:

- *Governance and organizational stability;*
- *Data privacy, security, and confidentiality practices;*
- *Staffing, supervision, and training capacity for HMIS users;*
- *Alignment with CoC and federal HMIS participation requirements;*
- *Technical capacity (hardware, connectivity, secure email, etc.); and*
- *Readiness to meet minimum data quality and timeliness expectations.*

Total points and minimum thresholds are used to determine whether an agency is:

- *Approved for HMIS participation;*
- *Approved with conditions (e.g., required policy updates, training, or technical changes); or*
- *Not approved at this time.*

The rubric is completed by the HMIS Lead Agency and may be reviewed by the HMIS & Data Committee as part of the governance and monitoring process described in Sections 3 and 13 of this document.

Official version available at: [INSERT FINAL LINK]

A reference copy is included on the following page. This version is for review only and is not valid for signature.

HMIS AGENCY ELIGIBILITY & READINESS RUBRIC

COALITION TO END HOMELESSNESS IN WICHITA/SEDGWICK COUNTY
(KS-502 – WICHITA/SEDGWICK COUNTY CONTINUUM OF CARE)

RUBRIC KEY

RUBRIC CATEGORY	APPLICATION QUESTIONS
1. SERVICE AREA ELIGIBILITY	A.9, B.1
2. POPULATION SERVED	A.10, A.11
3. ORGANIZATIONAL ELIGIBILITY	A.4
4. HOMELESS STATUS VERIFICATION	B.2
5. DATA READINESS	B.4, B.5
6. PRIVACY & PII AWARENESS	B.3
7. COC PARTICIPATION	A.12
8. PARTICIPATING AGENCY STATUS	A.13

TOTAL POINTS: _____ / 10

RECOMMENDED THRESHOLDS:
8–10 = RECOMMENDED FOR APPROVAL
5–7 = CONDITIONAL APPROVAL
0–4 = NOT RECOMMENDED

1. SERVICE AREA ELIGIBILITY (0–2 POINTS) SCORE: _____

- 0 – DOES NOT SERVE SEDGWICK COUNTY
- 1 – STATEWIDE/NATIONAL PROVIDER WITH SEDGWICK COUNTY HOMELESS CLIENTS
- 2 – LOCAL PROVIDER DIRECTLY SERVING HOMELESS CLIENTS IN SEDGWICK COUNTY

2. POPULATION SERVED (0–2 POINTS) SCORE: _____

- 0 – HOMELESS OR AT-RISK CLIENTS ARE A MINOR PORTION OF SERVICES (<25%)
- 1 – HOMELESS OR AT-RISK CLIENTS ARE A SIGNIFICANT PART OF SERVICES (25–50%)
- 2 – HOMELESS OR AT-RISK CLIENTS ARE A PRIMARY POPULATION SERVED (>50%)

3. ORGANIZATIONAL ELIGIBILITY (0–1 POINT) SCORE: _____

- 0 – NOT AN ELIGIBLE ENTITY
- 1 – ELIGIBLE ENTITY (NONPROFIT, GOVERNMENT, TRIBAL, OR SIMILAR)

4. HOMELESS STATUS VERIFICATION (0–1 POINT) SCORE: _____

- 0 – DOES NOT VERIFY HOUSING/HOMELESS STATUS APPROPRIATELY
- 1 – USES ACCEPTABLE VERIFICATION PROCESSES AND DOCUMENTATION

5. DATA READINESS (0–1 POINT) SCORE: _____

- 0 – NO BASIC CAPACITY TO MAINTAIN CLIENT DATA
- 1 – BASIC CAPACITY AND WILLINGNESS TO MAINTAIN ACCURATE HMIS DATA

6. PRIVACY & PII AWARENESS (0–1 POINT) SCORE: _____

- 0 – INSUFFICIENT UNDERSTANDING OF PII AND CONFIDENTIALITY REQUIREMENTS
- 1 – DEMONSTRATES UNDERSTANDING AND ABILITY TO PROTECT CLIENT INFORMATION

7. COC PARTICIPATION (0–1 POINT) SCORE: _____

- 0 – NOT A KS-502 COC MEMBER OR PARTICIPANT
- 1 – PARTICIPATES IN KS-502 COC MEETINGS, COMMITTEES, OR ACTIVITIES

8. PARTICIPATING AGENCY STATUS (0–1 POINT) SCORE: _____

- 0 – NO SIGNED INTERAGENCY NETWORK DATA SHARING AGREEMENT
- 1 – SIGNED AND CURRENT AGREEMENT ON FILE

HMIS Agency Eligibility & Readiness Rubric
Coalition to End Homelessness in Wichita/Sedgwick County
Last Amended and Approved: 11/18/2025