



# **Wichita ICT-CoC Homeless Management Information System (HMIS) Data Quality Plan**

The Wichita ICT-CoC Homeless Management Information System (HMIS) implementation is led by The Wichita ICT-CoC which is led by United Way of the Plains under guidance from the Wichita ICT-CoC HMIS/Data Committee. In turn, the Wichita ICT-CoC relies on the HMIS/Data Committee which is made up of local stakeholders to develop policy recommendations and provide guidance on implementation activities. These groups are committed to balancing the interests and needs of all stakeholders involved, including but not limited to homeless men, women, and children; service providers; funders; and policy makers. For further information in meeting HUD Data Standards, visit the 2020 HMIS Data Standards Manual at <https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

## **SECTION 1: Introduction**

### **1.1 Development Process**

The HMIS data quality plan was developed through a collaborative effort across service providers, the HMIS Lead, and was spearheaded by the HMIS/Data Committee, a subcommittee of the Wichita ICT-CoC.

### **1.2 Definition of Data Quality**

Data quality is a term that refers to the reliability and validity of client-level data collected in the HMIS. It is measured by the extent to which the client data in the system reflect actual information in the real world. With good data quality, the CoC can “tell the story” of the population experiencing homelessness. The quality of data is determined by assessing certain characteristics such as timeliness, completeness, and accuracy.

In order to assess data quality, the Wichita ICT-CoC has thought about what data quality means to Wichita/Sedgwick County and implementation and has documented this understanding in this data quality plan.

### **1.3 What is Data Quality Plan?**

A data quality plan is a community-level document that facilitates the ability of the CoC to achieve statistically valid and reliable data. A data quality plan sets expectations for both the community and the end users to capture reliable and valid data on persons accessing the homeless assistance system.

### **1.4 What is a Data Quality Monitoring Plan?**

A data quality monitoring plan is a set of procedures that outlines a regular, ongoing process for analyzing and reporting on the reliability and validity of the data entered into the HMIS at both the project and aggregate system levels. A data

quality monitoring plan is the primary tool for tracking and generating information necessary to identify areas for data quality improvement.

## 1.5 HMIS Software

The Eccovia software product, ClientTrack has been adopted by the Wichita ICT-CoC as the official HMIS for CoC providers. For the purposes of this documents, HMIS refers to ClientTrack and all modules, assessments, and reporting capacities, standard or customized, contained therein.

## SECTION 2

Data Quality Standards. The Data Quality Standards for Wichita ICT-CoC outlined in this plan are applicable to all projects participating in HMIS, with exceptions as noted under each standard. Unless otherwise noted, all participating projects using ClientTrack, including interfacing projects, are expected to achieve and maintain data quality standards.

For the Wichita ICT-CoC, the definitions for the different Program Types will follow the Program Models Chart (PMC). Providers are expected to review the PMC to identify the appropriate program for their projects and comply with the requirements outlined in this plan.

### 2.1 Timeliness

Entering data in a timely manner can reduce human error that occurs when too much time has elapsed between the data collection/service transaction and the data entry. Timely data entry ensures the data are accessible when they are needed, either proactively (e.g. monitoring purposes, increasing awareness, meeting funded requirements), or reactively (e.g. responding to requests for information, responding to inaccurate information).

The data entry guidelines below are considered best practice that projects should attempt to reach, however agencies are expected to improve incrementally over prior periods.

#### **Data Entry Timeframe by Program Type**

**Emergency Shelters:** Entry/Exits, Assessment, and Service Transactions as appropriate are entered within **72 Hours**.

- ❖ **Rapid Re-housing (CoC, ESG or HOPWA) and Homelessness Prevention and Shelter Diversion programs:** Entry/Exits, Assessments, Service Transactions and related data are entered within **72 Hours**.
- ❖ **Transitional, Permanent Supportive Housing:** Entry/Exits, Assessment, Service Transactions and related data are entered within **72 Hours**.
- ❖ **Supportive Service Only Program:** Entry/Exits, Assessment, Service Transactions and related data are entered for every client within **72 Hours**.
- ❖ **PATH:** Entry/Exits, Service Transactions and related assessment data (including the Outreach Sub-Assessment prior to enrollment) are entered within **72 Hours**.
- ❖ **Outreach programs and Engagement programs:** Data elements in the Outreach Sub-Assessment are entered within **72 Hours** of the first contact as the client is in the engagement process. Upon enrollment in services, a complete assessment must be done and entered within **72 Hours**.
- ❖ **Overall agency/Interfacing Agency cut-off:** Entry/Exits, Assessments and Service Transactions as appropriate are uploaded into the system by the **5<sup>th</sup> business day of the following month**.

### 2.2 Completeness

The purpose of completeness is to ensure sufficient data on clients, their demographic characteristics, and service use to facilitate confident reporting and analysis on the extent and characteristics of the homelessness including the following:

- ❖ Unduplicated counts of clients served at the local level
- ❖ Patterns of use of persons entering and exiting the homeless assistance system
- ❖ Evaluation of the effectiveness of homeless systems

### 2.2.1 All Clients Served

All projects participating in HMIS are required to comply with the data standards. Data entered need to be valid and accurately represent information on the clients being served.

#### Universal Data Elements (UDE)

The purpose of the UDEs is to ensure that all service providers participating in Wichita ICT-CoC HMIS are documenting the data elements necessary to produce Continuum-wide unduplicated count of clients served. This provides accurate counts for various reporting requirements, including the HUD Annual Performance Report (APR), the Annual Homeless Assessment Report (AHAR), The Longitudinal Services Assessment (LSA) plus other reporting requirements. This also ensures that the CoC has sufficient client data to conduct basic analysis on the extent and characteristics of the populations they serve.

Providers enter UDEs as part of the Comprehensive Assessment. This assessment is available to users following their submission of the client's Entry information that includes which Household Members are participating in the program, the Entry Type, and the Entry Date. As indicated in Section 2.1, Entry Dates and the associated information should be entered within an expected time frame and should accurately reflect the entrance of the client(s) into each project. The Entry Date should be the date the client(s) begin their participation in a program, either their participation in an intake assessment, their receipt of services, their outreach by program staff member, or their receipt of a night of shelter. The Comprehensive Assessment is completed with information obtained at this Entry Date.

Similarly, Providers enter specific Data Elements as a part of the Entry Assessment once the clients have completed and/or left the program. This assessment becomes available to users once they have indicated the household members who are leaving the program, the reason for leaving, the destination, and the Exit Date. The Exit Assessment should be completed on the final day in which the client receives a service or remain sheltered or housed within a program. Clients with an

“unknown” reason for leaving often do not return to the program as expected. These clients should have their Exit information recording as close to their last date of participation in the program as possible and should include information collected on or relevant to the date of the Exit Assessment.

***The percentage of UDEs with “null/missing” or “Data Not Collected” for all clients served in the Wichita ICT-CoC HMIS will be no higher than 5%.***

#### Program Specific Data Elements (PDEs)

As outlined in the new HUD Data standards, which Program Specific Data Elements are required is dictated by the reporting requirements set forth by each Federal partner for each of their projects. For the purposes of consistency, elements in the Comprehensive

Assessment are required for all projects participating in HMIS in Wichita/Sedgwick County. This is to ensure all service providers participating in Wichita ICT-CoC HMIS are documenting the data elements necessary to produce the Annual Performance Report, the HUD CoC Outcome Measures, and to ensure the CoC has sufficient client data to conduct analysis on the extent and characteristics of the populations they serve.

All PDEs in the Comprehensive Assessment as listed below are to be entered for all clients served.

- a) Housing Status
- b) Income and Sources
- c) Non-cash benefits
- d) Disability type
- e) Domestic Violence
- f) Health Insurance

Please refer to Exhibit 1.3 in Appendix A for a listing of all PDEs. Note that elements 3 through 8 are drop-down options for disability type in the Disability sub-assessment.

***The percentage of PDEs as listed in the Comprehensive Assessments with “null/missing” for all clients served in the Wichita ICT-CoC will be no higher than 5%.***

#### 2.2.2 Bed/Unit Utilization Rates

One of the primary features of an HMIS is the ability to record the number of client stays or bed nights at a homeless residential facility. Case managers or shelter staff enter a client into HMIS and will be trained to assign the clients to a

bed and/or a unit. The client remains there until he or she exits the program. When the client exits the program, he or she is also exited from the bed or unit in HMIS.

Low utilization rates could indicate that the residential facility was not very full, but it could also mean the HMIS data are not being entered for every client served. High utilization rates could mean the bed provider was over capacity, but it could also mean the program staff have not properly exited clients from the system.

Acceptable range of bed/unit utilization rates:

Emergency Shelters: **90%-105%**

Transitional Housing: **80%-105%**

Permanent Supportive Housing: **85%-105%**

New Project Exception: The Wichita ICT-CoC recognizes that new projects may require time to reach the projected occupancy numbers and will not expect them to meet the utilization rate requirements during the first operating year.

## 2.3 Data Accuracy and Consistency

The purpose of accuracy is to ensure that the data in the Wichita ICT-CoC HMIS are the best possible representation of reality as it relates to homeless persons and the programs that serve them. Entering partial information and/or noting that client 'did not know' or 'refused' is preferable to 'data not collected'.

Staff entering information into the HMIS database must enter information as stated by the client. Every project must enter data on clients in the same way over time, regardless of which staff person is recording the data in HMIS. Recording inaccurate information is strictly prohibited.

### 2.3.1 Accuracy and Consistency

- a) New agencies that acquire HUD or CoC funding that require HMIS participation will be required to review and understand all policies and procedures including data quality requirements.
- b) Providers will make every effort to record accurate data by entering data that reflects information provided by the Participant.
- c) Benchmark for accuracy;
  - a) Knowingly recording inaccurate information is strictly prohibited. Participating agencies shall report data errors to the HMIS Lead within 5 working days of discovering the error. Within 5 working days of receipt, the HMIS User will either correct the error or provide supporting

documentation. The HMIS lead will have the final decision-making authority.

- d) Consistency means that HMIS users will maintain a common understanding and practice of each data element, its response categories, and meaning.
- e) Benchmark for consistency:
  - a All data in HMIS shall be collected and entered in a common and consistent manner across all programs. All HMIS Users must complete an initial training before accessing the live HMIS system; furthermore; all HMIS Users must recertify their knowledge of data consistency practices on an annual basis.

### 2.3.2 Anonymous and Naming Conventions:

Providers will comply with all applicable federal and state laws regarding protection of client privacy.

Entering anonymous clients or partial client information impacts an accurate aggregate count of client information in Continuum-wide reports. Anonymous or partial entry of clients will not be allowed into the Wichita ICT-CoC database. The HMIS Lead will work with the providers currently entering clients as anonymous and address policy related issues to develop a transition or an alternate plan and comply with this policy.

## 2.4 Data Plan Monitoring

The Wichita ICT Continuum recognizes that data from HMIS are critical to meet the reporting and compliance requirements of individual agencies and the CoC as a whole.

To ensure that all projects are in compliance with the requirements and expectations outlined in this plan, the HMIS/Data Committee will monitor the process on a quarterly basis to identify and resolve any issues that affect the timeliness, completeness and the accuracy of data. The results will also be shared with the HMIS Committee and the Wichita ICT-CoC Board on a quarterly basis.

All monitoring will be done in accordance with the Data Quality Monitoring Plan (DQMP)



## **SECTION 3**

### **3. The Data Quality Monitoring Plan**

The Data Quality Monitoring Plan entails a set of procedures that outlines a regular, ongoing process for analyzing and reporting on the reliability and validity of the data entered into the HMIS at both the project and aggregate system levels. This plan serves as the primary tool for tracking and improving data quality for the Wichita ICT continuum.

The following sections are covered under this monitoring plan:

- a) Roles and Responsibilities
- b) HMIS Lead Timelines
- c) Timelines for Data Quality reports
- d) Compliance and Monitoring frequency
- e) Data Quality Reports and Outcomes

#### **3.1 Roles and Responsibilities**

**HMIS/Data Committee:** The HMIS/Data Committee provides authorization for, and oversight of, the Data Quality Plan. They will support the efforts of the Committee by enforcing the incentives described in the data quality plan.

**Contributing HMIS Organizations:** Providers are responsible for entering and correcting client data. It is the Agency Technical Administrator (ATA)'s role to oversee the process. It is recommended that each project run data quality reports on a monthly basis to meet the required HUD benchmarks. The CEO/Executive Director is ultimately responsible for all activity associated with agency staff access to and use of HMIS.

#### **3.2 HMIS Lead Timelines**

It is the responsibility of the HMIS Lead (United Way of the Plains) to run two important reports on behalf of the Wichita ICT Continuum of Care. It is the responsibility of the Wichita ICT-CoC to submit these reports into the HDX (HUD) website according to deadlines established by HUD. In this section, the Wichita ICT-CoC acts as the liaison to the HMIS lead.

- a) **Annual Homeless Assessment Report (AHAR):** The AHAR period begins on October 1 and ends on September 30 of the following year. In the Calendar year 2019, this AHAR report was shifted over to the Longitudinal Services Assessment Report (LSA). The timelines remain the same.
- b) **CoC Annual Performance Report (APR):** The HMIS Lead is to submit a CoC APR annually at the end of the HUD grant period. The HUD grant each year begins on May 1 and ends on April 30 of the following year.

All data quality reports will follow the above HUD reporting timelines to achieve compliance, completeness and accuracy of data for submission.

### **3.3 Timelines for Data Quality Reports**

While it is highly recommended that every project run the reports on a monthly basis, each of the projects are required to be in compliance and submit the results of the reports to the Wichita ICT-CoC on a quarterly basis. Specific timeliness and guidelines for submission will be communicated each quarter to the Participating Agencies. The data quality process will be administered four times annually, during the months of January, April, June/July and October.

All reports that are due for any period shall be submitted no later than the 16<sup>th</sup> of the month following the conclusion of that period.

### **3.4 Compliance and Monitoring Frequency**

It is the responsibility of the Agency's CEO and/or Executive Director along with the staff to ensure compliance with all data quality requirements and will be notified if their program does not meet any or all of the requirements. The Wichita ICT CoC HMIS/Data Committee and the staff understand that imposing multiple changes and expecting providers to comply with the changes can be challenging. Providers may be allowed to work on an alternative timeline for compliance if such challenges are communicated to the Wichita ICT-CoC in a timely manner.

Approval of such requests to work on an alternative timeline will be made on a case by case basis and communicated by the Lead. To ensure integrity, the HMIS/Data Committee will provide oversight and monitor these requests on a quarterly basis.

For all HUD-funded projects, lack of compliance with data quality requirements may result in forfeiting points in the annual local NOFO Evaluation Instrument, as determined annually by the Wichita ICT-CoC rank/review committee. Similar negative impacts may occur recommendations to DHS support/affiliation letters in support of ESG/HOPWA/RHY funding which requires the use of HMIS reporting. If, for unforeseen reasons, data issues arise during important reporting periods (such as AHAR, CoC Competition etc.), it will be the agency's responsibility to determine an alternative plan to ensure data are entered and corrected in the system to meet reporting deadlines and be in compliance.

### **3.5 Data Quality Reports and Outcomes**

HUD requires as a part of the data quality plan that a set of standard reports be created. For the Wichita ICT-CoC, there will be standard reports for all Program Types and some Program Type specific reports. Report details along with submission criteria and deadlines will be communicated every quarter by the CoC to

the Participating Agencies. All reports will comply with the HUD Data Standards and their requirements.

### 3.6 Incentives and Compliance Assurance

#### **Benchmark for Incentives:**

1. Agencies that meet the data quality benchmarks will be recognized periodically by the Wichita ICT-CoC HMIS Committee.
2. Agencies that exceed data quality benchmarks will be recognized periodically on the Wichita ICT-CoC public website.

#### **Benchmark for Compliance Assurance:**

1. To ensure that service providers have continued access to the expectations set forth in the Data Quality Plan and information about their comparative success in meeting those expectations, the following protocol will be used:
  - a. The Data Quality Plan will be posted to the Wichita ICT-CoC 's public website.
  - b. HMIS Administrators will run monthly Annual Performance Reports (APRs) for all projects for the purposes of facilitating compliance review by the 20th day of each month for the previous month.
  - c. Participating Agencies will have 10 days to correct data.
  - d. The Wichita ICT-CoC HMIS Committee will regularly review Participating Agency Data Quality Reports for compliance with the data quality benchmarks.
  - e. Wichita ICT-CoC HMIS committee will work with Participating Agencies to identify training needs to improve data quality.
  - f. The Wichita ICT-CoC HMIS Committee will provide a brief update on progress related to the data quality benchmarks at each Wichita ICT-CoC members' meeting.
2. Compliance with all changes in data quality elements shall be achieved within six (6) months of the approval of the change to this Data Quality Plan.
3. Agencies that fail to meet the data quality benchmarks may be asked by the Wichita ICT-CoC HMIS Committee to submit a written plan that details how they will take corrective action. The plan will be monitored by the HMIS Committee.

# SECTION 4

## Appendix B: Terms and Definitions

### Appendix B: Terms and Definitions

**Data Quality Benchmarks** – Quantitative measures used to assess the validity and reliability of the data. These include measures for timeliness, completeness and accuracy.

**Data Quality Monitoring Plan** -- A set of procedures that outlines a regular, on-going process for analyzing and reporting on the reliability and validity of the data entered into the HMIS at both the program and aggregate system levels. A data quality monitoring plan is the primary tool for tracking and generating information necessary to identify areas for data quality improvement.

**Data Quality Plan** – A community-level document that facilitates the ability of a CoC to achieve statistically valid and reliable data. A data quality plan is generally developed by the HMIS Lead Agency with input from community stakeholders, and is formally adopted by the CoC. At a minimum, the plan should:

- Identify the responsibilities of all parties within the CoC that affect data quality.
- Establish specific data quality benchmarks for timeliness, completeness, and accuracy.
- Describe the procedures that the HMIS Lead Agency will take to implement the plan and monitor progress to meet data quality benchmarks.
- Establish a timeframe for implementing the plan to monitor the quality of data on a regular basis.

**Data Quality Standards** – A national framework for ensuring that every Continuum of Care can achieve good quality HMIS data. It is anticipated that HUD will propose Data Quality Standards that 1) establishes administrative requirements and, 2) sets baseline data quality benchmarks for timeliness, completeness, and accuracy.

**Homeless Management Information Systems (HMIS)** -- A Homeless Management Information System (HMIS) is the information system designated by a local Continuum of Care (CoC) to comply with the requirements of CoC Program interim rule 24 CFR 578. It is a locally administered data system used to record and analyze client, service and housing data for individuals and families who are homeless or at risk of homelessness.

**Project Descriptor Data Elements (PDDE)** – refer to these elements as Project Descriptor because they describe the project (or the unit of an organization which is providing the service or lodging).

**Universal Data Elements (UDEs)** – HMIS Universal Data Elements are elements required to be collected by all projects participating in HMIS, regardless of funding source. UDE's establish the baseline data collection requirements for all contributing CoC projects. They are the basis for producing unduplicated estimates of the number of persons experiencing homelessness, accessing services from homeless assistance projects, basic demographic characteristics of persons experiencing homeless, and patterns of service use, including information on shelter stays and homelessness over time.

**Program Specific Data Elements (PDEs)** – Program Specific Data Elements differ from the Universal Data Elements in that no one project must collect every single element in this section. Which data elements are required is dictated by the reporting requirements set forth by each Federal partner for each of their programs. A Partner may require all of the fields or response categories in a data element or may specify which of the fields or response categories are required for their report.

**HMIS Data Quality** – Refers to the reliability and validity of client-level data. HMIS data quality can be measured by the extent to which the client data in the system reflects actual information in the real world.

### **HMIS Reports**

- **Annual Homeless Assessment Report (AHAR)** – HUD's annual report to Congress on the nature and extent of homelessness nationwide.
- **Longitudinal Services Assessment Report (LSA)** – HUD's annual report which is to replace the AHAR in 2019 as the report to congress regarding the nature and extent of homelessness nationwide.
- **Annual Performance Report (APR)** – A reporting tool that HUD uses to track program progress and accomplishments of HUD homeless assistance and HPRP Programs on an annual basis. Formerly known as the Annual Progress Report.

For a complete Glossary of HMIS Definitions and Acronyms, see the CoC HMIS Program Manual on the HUD Exchange located at <https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

This document is to keep track of all changes made to this document:

<b>SOP Section #:</b>	<b>Revised Section #</b>	<b>Revised Date:</b>	<b>Revised By:</b>	<b>Comments, if any</b>
All	All	1/13/23	Sburt	Originating document approved with edits by HMIS Data Committee.