

Santa Clara County Continuum of Care HMIS Partner Agency Policies

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The Santa Clara County (SCC) Continuum of Care (CoC) is charged with the administration, management, and operation of the Homeless Management Information System (HMIS) implementation, in addition to providing End User training and meeting Federal Reporting requirements. HMIS is a secure online database that stores data on all homeless services provided in SCC. The CoC uses this data to improve the ability of local organizations to provide access to housing and services and strengthen our efforts to end homelessness.

Data privacy and security is at the center of HMIS implementation and crucial in establishing trust with our partners and those we serve. To this end, the CoC has established policies to ensure all persons or entities accessing HMIS data do so in an authorized manner that protects data privacy, integrity, and confidentiality.

End Users, or HMIS Partner Agencies, must adhere to the [Partner Agency Privacy and Data Sharing Agreement](#) in its entirety.

Application Process

All agencies that meet HMIS Partner Agency criteria (listed below) and are interested in becoming HMIS Partner Agencies are required to complete [an application process](#) to be considered. The CoC will consider applications on a rolling basis using these policies.

The application review process is completed by CoC program staff at the Santa Clara County Office of Supportive Housing in partnership with Bitfocus. Once an application is received, the following process takes place. Items 1-3 occur usually within 15 business days.

1. Application is reviewed to ensure it meets HMIS Partner Agency criteria.
2. If the entity meets HMIS Partner Agency criteria, more specifics may be gathered to better understand entity's needs, how they plan to use HMIS, and how they will meet data security requirements. If there is another way to meet an entity's needs, staff will give resources and make connections as necessary.
3. If the application meets initial approval from CoC program staff, the application is routed for final approval from SCC County Counsel and OSH Director.
4. If approved, the agency will need to complete the [Partner Agency Privacy and Data Sharing Agreement](#) and can begin the onboarding process thereafter.

Applicants should be aware that HMIS configuration and access (e.g. program and services) will be consistent with SCC systemwide HMIS and subject to approval by the CoC in partnership with Bitfocus and SCC County Counsel.

Applicants who are approved have 60 days to complete the onboarding process. Agencies who do not complete the onboarding process within 60 days must reapply.

HMIS Partner Agency Requirements & Criteria

To be good stewards of data and ensure its security, the CoC will only grant access to entities that need HMIS to effectively serve those experiencing homelessness and housing instability. To this end, the CoC does not typically grant view-only access (e.g. for contract monitoring purposes) and users only have an access level that is appropriate for their program. If there is another way to meet an entity's needs, staff will give resources and make connections as necessary rather than grant HMIS access.

Requirements

Aside from meeting the below criteria, applicants need to comply with [Partner Agency Privacy and Data Sharing Agreement](#) and meet the following HMIS Partner Agency requirements, including:

- Assign and complete background checks for the required HMIS roles of [technical administrator/agency lead and security officer](#);
- Complete all [required training](#);
- Agree to indemnification of the County as set forth in [Exhibit A to the Partner Agency Privacy and Data Sharing Agreement](#);
- Provide a certificate of insurance to verify that the applicant maintains insurance coverages and provisions as set forth in [Exhibit A to the Partner Agency and Data Sharing Agreement](#)
- Completion of a network and security assessment that guarantees security of data (e.g. secure location, password protection, antivirus software, firewalls, storage of unencrypted protected personal information (PII)). **Personal computers and/or shared computers are not considered to meet data security requirements and increase risk to data privacy and security.** For more, refer to [Partner Agency Privacy and Data Sharing Agreement](#).
- Signing and executing a [Partner Agency Privacy and Data Sharing Agreement](#)

Criteria

The SCC CoC will consider providing partner agency status to agencies who satisfy all of the following criteria:

- Serves clients who are experiencing homelessness or clients at risk of homelessness.
- Provides services in Santa Clara County and can supply a Santa Clara County mailing address.
- Needs to perform *at least one* of these functions to effectively provide services:
 - Enter client data into HMIS
 - Assess and refer to Community Housing Queue¹
 - Receive referrals from the Community Housing Queue

Typically, agencies not providing direct services for people at risk of or experiencing homelessness are not granted HMIS access. The following are special cases that will be considered.

¹ Permanent supportive housing (PSH), rapid rehousing (RRH), and transitional housing (TH) programs fill spaces in their programs from a Community Housing Queue of eligible households generated from HMIS. Those on the Community Housing Queue are prioritized based on acuity and matched to the best type of housing intervention to address their situation, which is determined by a common assessment tool.

- **Care coordination partnerships:** Some entities need to coordinate with a homeless service provider to align services to best support participants in regaining stability. These instances will be reviewed on a case-by-case basis. The applicant will need to supply details in their application related to which HMIS Partner Agency they coordinate service with and the specific services that need to be coordinated.
- **Jurisdictions:** City governments will not be granted HMIS access unless they are operating a direct service program that meets the above criteria. In this case, that program only – not the department or city-at large – may be granted access. Jurisdictions receive bi-annual data they can use for reports and strategic planning. For data reporting needs beyond this report, jurisdictions can submit a data request to OSHData@hhs.sccgov.org.

To maintain data security, the following cases will not be granted access to HMIS:

1. Agencies who legally incarcerate individuals.
2. Victim Service Providers (cannot legally enter client data in HMIS and use a comparable database).
3. Agencies who share client data with law enforcement agencies.
4. Entities who do not provide direct services to people at risk of or experiencing homelessness.

For questions not answered by this document, please contact scc-admin@bitfocus.com.