



Mission: Build partnerships and promote strong collaborative action to ensure all residents within the County have stable, safe, and healthy places to live.

**Housing for Health Partnership Policy Board
Regular Meeting Agenda - Virtual/Teleconference**

Zoom Link: <https://us06web.zoom.us/j/89495266878>

TELEPHONE: +1 669 900 6833 WEBINAR ID: 894 9526 6878

October 19, 2022; 4 pm – no later than 7 pm

Call to Order/Welcome

Non-Agenda Public Comment

Action Items (vote required):

1. Findings Authorizing Teleconference Meetings
2. Approval of Minutes: August 17, 2022 Regular Meeting
3. Approval of Minutes: September 14, 2022 Special Meeting
4. Adoption of Updated HMIS Policies, Procedures, and Forms
5. Adoption of Low-Barrier Navigation Center Standards

Information Items (no vote required):

6. Santa Cruz and Monterey County CoC – CalAIM Update Community Meeting - October 26, 2022, 2-3:30 pm
7. Recovery Café San Jose Informational Tour – November 9, 2022, 3-4 pm
8. 2023 Point In Time (PIT) Count Initial Community Planning Meeting – October 27, 11am-12pm
9. Youth Advisory Board and Lived Experience Advisory Board Planning
10. No Place Like Home (\$18,174,282 + \$4,097,054) and State Budget Awards \$8M for Supportive Housing
11. City of Santa Cruz – Coral Street – Design Charette with Dahlin Group

Report/Discussion Items (no vote required):

12. Housing for Health Partnership Policy Board Meeting Scheduling and Co-Chair Discussion

Board Member Announcements

Adjournment

**Next Meeting: Housing for Health Partnership Policy Board
December 14, 2022 @ 4 pm**

The County of Santa Cruz does not discriminate on the basis of disability, and no person shall, by reason of a disability, be denied the benefit of the services, programs, or activities. This meeting is located in an accessible facility. If you are a person with a disability and require special assistance in order to participate in the meeting, please call (831) 763-8900 (TDD/TTY- 711) at least 72 hours in advance of the meeting in order to make arrangements. Persons with disabilities may request a copy of the agenda in an alternative format. As a courtesy to those affected, please attend the meeting smoke and scent free.

Housing for Health Partnership Policy Board Regular Meeting Agenda – October 19, 2022

Action Item 1: Findings Authorizing Teleconference Meetings

(Action required) – Robert Ratner

Recommendation

Adopt findings pursuant to Assembly Bill 361 authorizing teleconference meetings as a result of the continuing COVID-19 pandemic state of emergency and Health Officer recommendation for social distancing.

Background

New State law adopted by the Legislature and signed by Governor Newsom (AB 361) allows local agencies to continue to meet by teleconference and internet platform as long as a state of emergency exists and local or state authorities have recommended social distancing measures. In a related provision, the legislative body, by a majority vote, can take action to meet via teleconference in order to avoid meeting in person and therefore reduce imminent risks to the health and safety of members of the public. If a legislative body continues to meet via teleconference, it must take action to renew this declaration every 30 days.

Suggested Motion

I move to adopt findings pursuant to Assembly Bill 361 authorizing teleconference meetings as a result of the continuing COVID-19 pandemic State of Emergency and Health Officer recommendation for social distancing.



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SANTA CRUZ COUNTY HOUSING FOR HEALTH PARTNERSHIP POLICY BOARD

FINDINGS PURSUANT TO ASSEMBLY BILL 361 AUTHORIZING TELECONFERENCE MEETINGS AS A RESULT OF THE CONTINUING COVID-19 PANDEMIC STATE OF EMERGENCY AND HEALTH OFFICER RECOMMENDATION FOR SOCIAL DISTANCING

WHEREAS, the Santa Cruz County Housing for Health Partnership Policy Board is a legislative body under the Brown Act as defined under Cal. Gov. Code section 54952(b) and Santa Cruz County Code Section 2.38.110; and

WHEREAS, on September 16, 2021, Governor Newsom signed Assembly Bill 361 (“AB 361”), urgency legislation effective immediately, that amended Government Code section 54953 to permit legislative bodies subject to the Brown Act to continue to meet under modified teleconferencing rules provided that they comply with specific requirements set forth in the statute; and,

WHEREAS, pursuant to AB 361 and Cal. Gov. Code section 54953(e)(1)(A), a legislative body may meet under the modified teleconferencing rules during a proclaimed state of emergency, and where local officials have imposed or recommended measures to promote social distancing; and

WHEREAS, on March 4, 2020, Governor Newsom issued a Proclamation of State of Emergency in response to the COVID-19 pandemic, and which remains in effect; and

WHEREAS, on September 30, 2021, Santa Cruz County Public Health Officer Dr. Gail Newel strongly recommended that legislative bodies in Santa Cruz County continue to engage in physical/social distancing by meeting via teleconference as allowed by AB 361 and confirmed that she will regularly review and reconsider this recommendation and notify the public when it is no longer recommended; and

WHEREAS, pursuant to AB 361 and Cal. Gov. Code section 54953(e)(3), within 30 days of the date the legislative body first holding a teleconferenced meeting under the modified rules, and every 30 days thereafter, a legislative body can continue to hold such teleconference meetings provided it has reconsidered the circumstances of the state of emergency and determined either that the state of emergency continues to directly impact the ability of the members to meet safely in person or that local officials continue to recommend measures to promote social distancing; and

WHEREAS, on October 19, 2022, the Santa Cruz County Housing for Health Partnership Policy Board, held a teleconference meeting under AB361; and

WHEREAS, this Policy Board has reconsidered the circumstances of the current state of emergency and finds that the COVID-19 pandemic continues to directly impact the ability of members of the public to participate safely in person and further finds that the Santa Cruz County Public Health Officer continues to recommend measures to promote social distancing; and

WHEREAS, in the interest of public health and safety, and due to the emergency caused by the spread of COVID-19, the Santa Cruz County Housing for Health Partnership Policy Board deems it necessary to utilize the modified teleconferencing rules set forth in AB 361;

NOW, THEREFORE, the Santa Cruz County Housing for Health Partnership Policy Board makes the following findings by a majority vote:

Section 1. The foregoing recitals are true and correct, and adopted as findings of the Santa Cruz County Housing for Health Partnership Policy Board.

Section 2. Effective immediately, and for the next 30 days, the Santa Cruz County Housing for Health Partnership Policy Board will meet via teleconference as authorized under AB 361 and Government Code section 54953(e)(3).

Section 3. No later than thirty (30) days from making today’s findings, or at the next scheduled meeting, the Policy Board will reconsider the circumstances of the COVID-19 state of emergency and, if necessary, adopt subsequent findings to continue holding teleconference meetings in accordance with Government Code section 54953(e)(3).

PASSED AND ADOPTED by the Santa Cruz County Housing for Health Partnership Policy Board in Santa Cruz, State of California, this 19th day of October 2022, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST: _____

Department Staff

Approved as to Form:

Office of the County Counsel

Action Item 2: Approval of Meeting Minutes

(Action required) – Robert Ratner

Recommendation

Approve the August 17, 2022 Housing for Health Partnership Policy Board Regular Meeting minutes.

Suggested Motion

I move to approve the August 17, 2022 Housing for Health Partnership Policy Board Regular Meeting minutes.



**Housing for Health Partnership Policy Board
Regular Meeting Minutes
August 17, 2022; 4 pm – no later than 7 pm**

INTRODUCTORY ITEMS

1. Call to Order/Roll Call
Present: Heather Rogers, JP Butler, Jamie Goldstein, Judy Hutchison, Larry Imwalle, Manu Koenig, Mariah Lyons, Martine Watkins, Rachel Dann (for Supervisor Ryan Coonerty), Stephanie Sonnenshine, Susan True, Suzi Merriam, Tamara Vides, Tiffany Cantrell-Warren
Absent: None
2. Additions and Deletions to the Agenda: *None*
3. Approval of Minutes: *It was moved to approve the June 8, 2022 Board minutes pending corrections to meeting notes to indicate Board members that made and seconded a motion and a recording of the votes on the motion.*
Motion to Approve: Jamie Goldstein
Motion Seconded: Manu Koenig
Abstentions: Rachel Dann
Board Action: All in favor, motion passed.
4. Announcements/Information Sharing
No comments, questions, or additional announcements made.
5. Public Comment
No public comment received.

ACTION ITEMS

6. Ratify the submission of four California Emergency Solutions Grant (ESG) applications as authorized by electronic vote among Policy Board members prior to the application submission deadline of April 17, 2022.

Discussion: Discussed virtual voting not allowed per Brown Act process. Board members recommended staff consult with County Counsel on appropriate procedures going forward. Suggestion made to have Board appoint an executive committee to make certain decisions for the Board within a certain threshold or to call a special meeting.

Public Comment: None.

Motion: Approve staff recommendations regarding ESG funding applications.

Motion to Approve: Jamie Goldstein.
Motion Seconded: Judy Hutchison.
Abstentions: None.
Board Action: All in favor, motion passed.

7. Establish and authorize a HUD CoC Notice of Funding Opportunity (NOFO) application review committee of 4-6 non-conflicted individuals from the CoC Policy Board to complete an application review and ranking process on or before September 14, 2022 for the: 1) 2022 CoC Program Competition and Non-Competitive Award of Youth Homelessness Demonstration Program Renewal and Replacement Grants; and 2) Supplemental Notice of Funding Opportunity to Address Unsheltered and Rural Homelessness.

Discussion: Sheryl Norteye (H4H staff member) provided an overview of the HUD FY 2022 CoC NOFO. Discussed the need to solicit applications for renewals, new projects, new DV bonus projects, and Unsheltered NOFO. Concerns and questions were raised about soliciting applications for projects and the consequences of not receiving applications for specific funding opportunities. Board members suggested reaching out to organizations that may have an interest in this funding opportunity. Discussed letters of commitment needed and explanation of the separate application types needed for this fiscal year. Discussed lack of building-based supportive housing units within the County and the challenges of pairing supportive services with scattered site permanent supportive housing within the County. Asked for volunteers for HUD NOFO rating and ranking subcommittee. Heather Rogers, Judy Hutchison, Larry Imwalle volunteered. Suggestion to recruit at least one subcommittee member with lived experience of homelessness. Robert Ratner volunteered to recruit at least one additional member with lived experience.

Public Comment on Item: None.

Motion to Approve H4H staff to prepare a backup rental assistance proposal for the unsheltered NOFO if a qualifying local application is not received: Manu Koenig

Motion Seconded: Tamara Vides (with comment for staff to consider partnership with Monterey County)

Abstentions: None.

Board Action: All in favor, motion passed.

Motion to approve creation of a HUD CoC NOFO subcommittee of 4-6 members with at least one member with lived experiencing homelessness and for a Policy Board special meeting on or before September 15, 2022 to take action on the subcommittee recommendations: Tamara Vides

Motion Seconded: Suzi Merriam.

Abstentions: None.

Yes votes: Heather Rogers, JP Butler, Jamie Goldstein, Judy Hutchison, Larry Imwalle, Manu Koenig, Mariah Lyons, Martine Watkins, Rachel Dann (for Supervisor Ryan Coonerty), Stephanie Sonnenshine, Susan True, Suzi Merriam, Tamara Vides.

No vote: Tiffany Cantrell-Warren.

Board Action: Motion passed.

DISCUSSION ITEMS

8. August 9, 2022 County Board of Supervisors Housing for Healthy Santa Cruz Update Presentation – includes Project Homekey, PIT count, and other updates. Opportunity for Policy Board members to review and discuss materials.

Robert Ratner provided a brief review of materials including in the meeting packet including a summary of initial PIT count results and highlighting gaps in achieving very low income RHNA housing goals across nearly all jurisdictions within the County. a brief highlight on the PIT count report and being behind in the RHNA goals across all jurisdictions. Discussions were held on using materials from work done by Andrew Henning on Housing and Homelessness.

9. Review and feedback to staff on the utility of visual diagrams outlining factors contributing to homelessness, a “system” map, and system flow diagrams.

Board provided feedback on visual diagrams included in the Board packet. Board members generally supported the use of visual tools for community education and information but felt the materials in the packet were too detailed. There was a general recommendation to staff to breakdown information into smaller, easier to understand visuals.

10. Next Regular Meeting October 19, 2022 @ 4 pm. *Special meeting to get scheduled prior to September 15, 2022.*

MEETING ADJOURNED

Action Item 3: Approval of Meeting Minutes

(Action required) – Robert Ratner

Recommendation

Approve the September 14, 2022 Housing for Health Partnership Policy Board Special Meeting minutes.

Suggested Motion

I move to approve the September 14, 2022 Housing for Health Partnership Policy Board Special Meeting minutes.



**Housing for Health Partnership Policy Board
Special Meeting Minutes
Virtual/Teleconference**

Zoom Link: <https://us06web.zoom.us/j/84366468818>
TELEPHONE: +1 669 444-9171 WEBINAR ID: 843 6646 8818

September 14, 2022; 12-1 pm

1. Call to Order/Welcome
Board Members Present: JP Butler, Jamie Goldstein, Judy Hutchison, Larry Imwalle, Martine Watkins, Shane McKeithen (for Supervisor Manu Koenig, Stephanie Sonnenshine, Suzi Merriam, Tamara Vides, Tiffany Cantrell-Warren
Board Members Absent: Heather Rogers, Mariah Lyons, Ryan Coonerty, Susan True
Staff Present: Robert Ratner, Anthony Gardner
2. Additions and Deletions to the Agenda: *None*
3. Housing for Health Division Announcements/Information Sharing: *None*
4. Action Items (Vote Required)
 - A. Approve the rating, ranking, funding reallocation, and new project application recommendations of they FY 2022 Housing and Urban Development (HUD) Notice of Funding Opportunity (NOFO) subcommittee.

Discussion: Reviewed summary and basis for recommendations outlined in Attachment 4A1. Reviewed HUD project component abbreviations and received recommendation to provide more detail to distinguish project types. PH = Permanent Housing (Permanent Supportive Housing or Rapid Rehousing); HMIS = Homeless Management Information System; SSO = Supportive Services Only (SSO); TH = Transitional Housing. Request made to summarize the impact of the HUD CoC funding, including whether the program helps with retaining housing or helping currently homeless households to obtain housing. Reviewed the HUD CoC distinctions between Tier 1 and Tier 2 and funding implications. Discussed proposal to link Unsheltered NOFO proposal with health care, public defender linkages. Discussed target populations for proposed projects and rationale behind selected populations for each proposal. Reviewed board members with conflicts of interest related to staff recommendation #1. Those board members abstained from voting on the item.

Public Comment: None.

Motion to Approve Staff Recommendation Item #1: Jamie Goldstein

Motion Seconded: Tamara Vides

Abstentions: JP Butler, Tiffany Cantrell-Warren

Housing for Health Partnership Policy Board Special Meeting Minutes – September 14, 2022

Not Present for Vote: Suzi Merriam

Board Action: Motion approved (Yes votes - Jamie Goldstein, Judy Hutchison, Larry Imwalle, Shane McKeithen (for Supervisor Manu Koenig), Mariah Lyons, Martine Watkins, Stephanie Sonnenshine, Tamara Vides)

Motion to Approve Staff Recommendations Items #2 - #8: Tamara Vides

Motion Seconded: JP Butler

Abstentions: None

Not Present for Vote: Suzi Merriam

Board Action: Motion approved {Yes votes - JP Butler, Jamie Goldstein, Judy Hutchison, Larry Imwalle, Martine Watkins, Shane McKeithen (for Supervisor Manu Koenig), Stephanie Sonnenshine, Tamara Vides, Tiffany Cantrell-Warren }

5. Policy Board Member Announcements: *None*
6. Next Meeting: *Regular Policy Board Meeting – October 19, 2022 @ 4 pm*
7. Meeting Adjournment

Action Item 4: Adoption of Updated HMIS Policies, Procedures, and Forms

(Action required) – Robert Ratner/CoC Operations Committee

Recommendation

Adopt the updated HMIS policies, procedures, and forms and direct Housing for Health Division staff to develop and execute an implementation plan based on the new policies, procedures, and forms.

Background

The Santa Cruz County CoC last updated its HMIS policies and procedures in 2009 when Community Technology Alliance (CTA) was the HMIS administrator. Significant changes to the governance of the CoC and federal and state regulations and laws relevant to HMIS and data privacy and security have changed since the last revision. Housing for Health Division staff worked with Focus Strategies to develop proposed revisions to HMIS policies, procedures, and forms. DRAFT versions of materials were reviewed by CoC Operational Committee members and county counsel. Recommended changes were incorporated into the DRAFT version included in the Board packet.

Housing for Health Division and BitFocus (HMIS vendor) staff anticipate that full implementation of the proposed changes will likely take at least six months. The DRAFT policy document calls for annual CoC review and updates to the policy. The Housing for Health Division will have a new staff member hired this month. One of their key roles will be supporting provider organizations with the implementation of the new HMIS standards.

The section of the new materials that garnered the most interest among provider organizations was related to HMIS access and licenses. Historically, HMIS using agencies were required to pay for use of the system and additional licenses. With the creation of the Housing for Health Division and new fiscal leveraging opportunities, the CoC has moved away from charging agencies for licenses. However, budgetary constraints will continue to limit the number of agencies and individuals with licenses. In FY 22-23, the Housing for Health Division was able to support 50 additional user licenses to bring the total available licenses to 198 at an annual maximum system cost of \$331,694/year. Going beyond 200 licensed users, significantly increases the overall cost of HMIS due to the vendors tiered contract levels. The section below excerpts the policy and procedure manual relevant to agency and user license access:

“H4H in partnership with the CoC policy board establishes the number of available HMIS user licenses on a fiscal year basis with the development of an annual HMIS program budget. Increasing the number of available user licenses typically requires an HMIS budget augmentation that requires a minimum of 90 days to implement. H4H and BitFocus staff review HMIS licensed user activity on a quarterly basis and determine if adjustments to licensure status are necessary. Users that do not access the system within a 90-day period will receive

notification that their user's access may be terminated, given that HMIS policies require program participant data updates at least every 90 days.

Prioritized access to HMIS user licenses will be given to agencies and programs receiving federal or state funding that require HMIS participation, those that have contracts with the County of Santa Cruz Human Services Department Housing for Health Division, or those with Central California Alliance for Health community supportive services housing contracts. To qualify as an HMIS using agency, agencies must be able to meet the insurance and other contractual requirements associated with receiving funding from one or more of the above funding sources. Agencies and programs that fall in the priority groups listed above AND that provide services to underserved or disparately impacted groups should be given priority access to limited HMIS user licenses in times of budgetary constraints limiting available user licenses.

Prioritized agencies and programs will be encouraged and supported to have all direct service staff utilize HMIS within their programs. Access to user licenses is for individuals providing direct services to participants that utilize an HMIS specific program for managing participant profiles, enrollments and exits, assessments, status updates, and services. HMIS licenses are not provided for view only purposes. In general, each agency should have no more than one manager and data analysis license per program for running and using regular data quality reports at least every 90 days."

The updated policies and procedures will allow for increased data sharing, integration, and provider collaboration opportunities with the Santa Cruz Health Information Organization (SCHIO) and the Central California Alliance for Health (the Alliance). These changes will support implementation of California Advancing and Innovating Medi-Cal (CalAIM) activities and help the Alliance secure Housing and Homelessness Incentive Program (HHIP) payments from the California Department of Health Care Services.

Suggested Motion

I move to adopt the updated HMIS policies, procedures, and forms and direct Housing for Health Division staff to develop and execute an implementation plan based on the new policies, procedures, and forms.



WATSONVILLE/SANTA CRUZ CITY & COUNTY
CONTINUUM OF CARE (COC)

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

Policies and Procedures

I. INTRODUCTION

The Watsonville/Santa Cruz City & County CoC's Covered Homeless Organizations (CHOs) utilize a computerized record-keeping system that captures information about people experiencing or at-risk of homelessness called the Watsonville/Santa Cruz City & County CoC Homeless Management Information System (Watsonville/Santa Cruz CoC HMIS). The CoC uses HMIS data to: improve housing and services quality; identify patterns and monitor trends over time; conduct needs assessments and prioritize services and housing resources for subpopulations experiencing or at-risk of homelessness; enhance inter-agency coordination; and monitor and report on the delivery, impact, and quality of housing and services. HMIS creates an unduplicated count of individuals and households at-risk of or experiencing homelessness and develops aggregate information that assists in developing policies and programs to end homelessness. In addition, the Watsonville/Santa Cruz CoC HMIS allows CHOs to share information electronically about consumers, including their service needs, to better coordinate services and housing.

The lead administrative entity for the CoC is the County of Santa Cruz Human Services Department Housing for Health Division (H4H) and the HMIS system is administered by Bitfocus. Bitfocus is also the current Watsonville/Santa Cruz CoC HMIS Software as a Service (SaaS) vendor and works to make HMIS an effective tool for all CHOs.

Aggregated, anonymous data from the Watsonville/Santa Cruz CoC HMIS is used to generate reports for federal, state, and local funders; it is used to produce reports for the annual Point-in-Time (PIT) count, Longitudinal System Analysis (LSA), the Annual Homeless Assessment Report (AHAR), Annual Performance Reports (APRs), System Performance Measures (SPMs), California's Homeless Data Integration System (HDIS), and other required reports provided to federal, state, and local funders.

Effective implementation of the Watsonville/Santa Cruz CoC HMIS can benefit individuals and families at-risk of or experiencing homelessness, CHOs, public policy planners, and the community. This document provides an overview of current policies, procedures, guidelines, and standards that govern Watsonville/Santa Cruz CoC HMIS operations, as well as the responsibilities for CHOs and HMIS End Users. The Appendices provide the specific current applicable policies.

II. GOVERNING PRINCIPLES

Described below are the overall governing principles upon which all decisions pertaining to the Watsonville/Santa Cruz CoC HMIS are based. Agencies, programs, and individual users are expected to read, understand, and adhere to the spirit of these principles, especially when current written policies and procedures do not provide specific direction. The CoC policy board determines and reaffirms on an annual basis the selection of the HMIS vendor and system administrator, as well as the CoC administrative entity that oversees the HMIS vendor and system administration. The CoC operations committee proposes updates to HMIS policies, procedures, and forms on an annual basis that are ratified by the CoC Policy Board.

Confidentiality

The rights and privileges of consumers are crucial to the success of HMIS. These policies will ensure consumers' privacy without impacting the delivery and coordination of services and housing resources, which are the primary focus of programs participating in HMIS.

Policies regarding consumer data are founded on the premise that a consumer owns their own personal information; these policies aim to provide the necessary safeguards to protect consumer, agency, and policy level interests. Collection, access, and disclosure of consumer data through HMIS is only permitted by the procedures set forth in this document.

Data Integrity

Consumer data is the most valuable and sensitive asset of the Watsonville/Santa Cruz CoC HMIS. These policies ensure integrity and protect this asset from accidental or intentional unauthorized modification, destruction, or disclosure.

System Availability

The availability of a centralized data repository is necessary to achieve the service, housing, and outcome goals desired for people experiencing or at risk of homelessness, H4H, the CHOs, and the CoC. The CoC and Bitfocus, as the System Administrator, are responsible for ensuring the broadest deployment and availability of the HMIS data system necessary and possible with available resources to capture collective efforts to address homelessness in Santa Cruz County.

III. HMIS BENEFITS

Use of the Watsonville/Santa Cruz CoC HMIS can provide numerous benefits for persons at-risk of or experiencing homelessness, H4H, CHOs, and the CoC.

Benefits for persons at-risk of or experiencing homelessness:

- Intake information and needs assessments are maintained, reducing the number of times persons at-risk of, or experiencing homelessness must repeat their stories to multiple staff members or to multiple CHOs
- Multiple services can be coordinated, and referrals can be streamlined to ensure consumers are matched appropriately to services and housing resources to end their housing crisis as quickly as possible
- Ensures consumer confidentiality by providing information in a secured system

Benefits for H4H, CHOs and the CoC:

- Provides online, real-time information about consumer needs and the services and housing resources available for persons at-risk of or experiencing homelessness
- Ensures consumer confidentiality by providing a secured system to help CHOs avoid data breaches and misuse of HMIS data
- Decreases duplicative consumer intakes and assessments
- Tracks consumer outcomes and service and housing history
- Generates data reports for local, state, and federal reporting requirements
- Facilitates the coordination of services and housing resources within and among CHOs
- Assists in defining and understanding the extent of homelessness throughout the CoC
- Can be used to evaluate the effectiveness of specific interventions and projects, as well as services and housing provided
- Can be used for developing data-informed solutions to reduce and end homelessness.

IV. ROLES AND RESPONSIBILITIES

A. Housing for Health Partnership - Policy Board

- Initial selection and annual confirmation of HMIS administrator and vendor
- Annual review and approval of HMIS policies and procedures and associated forms
- Approval of funding for HMIS when the funding source requires CoC approval

B. Housing for Health Partnership - Operations Committee

- Project direction, guidance, participation, and feedback
- Recommend changes to HMIS policies and procedures
- Advise on funding strategies
- Review of performance metrics, data quality, and compliance issues

C. Housing for Health Division - CoC Administrative Entity

- CHO oversight, coordination, and liaison for use of HMIS
- Development and maintenance of HMIS policies & procedures
- Development and maintenance of HMIS forms and documentation
- End user license monitoring
- Data quality and performance metrics monitoring

D. HMIS Vendor and System Administrator - Bitfocus

- Maintenance of Watsonville/Santa Cruz CoC HMIS website
- Central Server Administration
 - Server security, configuration, and availability
 - Setup and maintenance of hardware
 - Configuration of network and security layers
 - Anti-virus protection for server configuration
 - System backup and disaster recovery
 - User administration and license management
 - System uptime and performance monitoring
- Adherence to HUD Data Standards
- Maintain list of all Partner Agencies and make it available to the public including posting it on the Watsonville/Santa Cruz CoC HMIS portal

- Aggregate data reporting and extraction
- Watsonville/Santa Cruz CoC HMIS Help Desk
- HMIS training
- Data breach reporting to H4H
- Liaison with HUD on required federal data collection and reporting standards and expectations

E. Covered Homeless Organizations (CHOs)

- CHO Executive Director
 - Authorizing agent for Organization Partnership and Data Sharing Agreement
 - Designation of CHO HMIS Primary Contact
 - Ensuring agency compliance with HMIS policies & procedures
- CHO HMIS Primary Contact
 - Designated and primary liaison with H4H and Bitfocus on HMIS
 - Request new user ID and licenses from Bitfocus on behalf of CHO
 - Maintain agency/program data in HMIS application
 - End user adherence to privacy and security policies
 - Ensuring data breach reporting to Bitfocus
 - First level end user support
 - Ensure use of most current HMIS policies and forms
 - Ensuring quality of HMIS data collection and entry by CHO staff/end users
- CHO Staff/End User
 - Sign the Watsonville/Santa Cruz CoC HMIS User Agreement and complete required Watsonville/Santa Cruz CoC HMIS training for staff/end users
 - Take appropriate measures to prevent unauthorized data disclosure
 - Report all privacy and/or security violations to HMIS lead
 - Comply with relevant policies and procedures
 - Collection and input required data fields in a consistent, accurate, and timely manner
 - Ensure a minimum standard of data quality by accurately answering the Universal Data Elements and required program-specific data elements for every individual and household entered into the Watsonville/Santa Cruz CoC HMIS

- Inform consumers about the CHO's use of the Watsonville/Santa Cruz CoC HMIS
- Take responsibility for any actions undertaken with one's username and password

F. HMIS License Availability and Access

CHOs may request end user licenses at any time from Bitfocus. H4H is informed when a CHO requests an end user license and makes the decision on whether to grant that request, based upon licenses available, licenses already assigned to the CHO, HMIS data requirements associated with a program and program funding, CHO staff and data management capacity and need, and funding available. The CoC reserves the right to change the license acquisition and allocation process based upon CoC funding availability. H4H staff may bring HMIS access issues and questions to the CoC operations board for resolution if needed. Participating agencies and licensed users must comply with HMIS privacy and security standards and other established policies and procedures.

H4H in partnership with the CoC policy board establishes the number of available HMIS user licenses on a fiscal year basis with the development of an annual HMIS program budget. Increasing the number of available user licenses typically requires an HMIS budget augmentation that requires a minimum of 90 days to implement. H4H and BitFocus staff review HMIS licensed user activity on a quarterly basis and determine if adjustments to licensure status are necessary. Users that do not access the system within a 90-day period will receive notification that their user's access may be terminated, given that HMIS policies require program participant data updates at least every 90 days.

Prioritized access to HMIS user licenses will be given to agencies and programs receiving federal or state funding that require HMIS participation, those that have contracts with the County of Santa Cruz Human Services Department Housing for Health Division, or those with Central California Alliance for Health community supportive services housing contracts. To qualify as an HMIS using agency, agencies must be able to meet the insurance and other contractual requirements associated with receiving funding from one or more of the above funding sources. Agencies and programs that fall in the priority groups listed above AND that provide services to underserved or disparately impacted groups should be given priority

access to limited HMIS user licenses in times of budgetary constraints limiting available user licenses.

Prioritized agencies and programs will be encouraged and supported to have all direct service staff utilize HMIS within their programs. Access to user licenses is for individuals providing direct services to participants that utilize an HMIS specific program for managing participant profiles, enrollments and exits, assessments, status updates, and services. HMIS licenses are not provided for view only purposes. In general, each agency should have no more than one manager and data analysis license per program for running and using regular data quality reports at least every 90 days.

V. REQUIREMENTS FOR PARTICIPATION

A. CHO General Requirements

Participation Agreement Documents

CHOs must complete the following documents:

1. *Organization Partnership and Data Sharing Agreement*: Must be signed by each participating CHO's Executive Director. The Organization Partnership and Data Sharing Agreement states the Organization's commitment to adhere to the policies and procedures for effective use of the Watsonville/Santa Cruz CoC HMIS.
2. *HMIS User Agreement and Code of Ethics*: Details the HMIS User policies and responsibilities and is signed by each authorized end user prior to receiving an HMIS user license and then annually thereafter.

Assign HMIS Agency Primary Contact

1. The CHO shall designate a primary HMIS agency contact for communications regarding Watsonville/Santa Cruz CoC HMIS within the CHO and shall notify Bitfocus of their name and contact information.
2. Bitfocus will maintain a list of all designated HMIS Primary Contacts.

End User Access

1. All potential end users must undergo a background check completed by the CHO, as detailed in the Organization Partnership and Data Sharing Agreement. Individuals with a history of data fraud, identity theft, or misuse of confidential information, or an individual who is under investigation for such issues, shall not be permitted an HMIS user license.
2. End users must be paid staff or official volunteers of a CHO. An official volunteer must complete a volunteer application with the CHO, undergo Organization training, pass a background check, and record volunteer hours with the Organization. Individuals who are solely contracting with a CHO are prohibited from receiving a user license. All end users must be at least 18 years old.
3. The CHO HMIS Primary Contact will submit a request for new end user access to Bitfocus. Each HMIS end user must have their own username and password to access the system.
4. Prior to the end user gaining access to HMIS, the HMIS Lead (BitFocus) will assess the operational security of the user's workspace and confirm the workstation has virus protection properly installed and that a full-system scan has been performed within the last week.
5. All end users must complete training before access to the system is granted (see below). All end users shall commit to abide by the governing principles of the Watsonville/Santa Cruz CoC HMIS and adhere to the terms and conditions of the HMIS User Agreement and Code of Ethics.

B. CHO Training Requirements

New User Training

1. All end users are required to attend a new end user privacy and security training and basic HMIS system training with Bitfocus prior to receiving access to the system.
2. Upon their first log in to Clarity, end users are asked to sign a confidentiality agreement that acknowledges they received the HMIS Privacy Policy and of which they pledge to comply. All electronically signed new user agreements are stored in the system.
3. Users must complete training and pass a knowledge-based quiz prior to gaining HMIS access.

Ongoing Training

1. All end users are required to attend annual privacy trainings to retain their Watsonville/Santa Cruz CoC HMIS license. The annual training will include re-signing the user agreement and passing a knowledge-based quiz.
2. Bitfocus will provide regular trainings for the CHOs and can provide specialized trainings when necessary. Refer to the HMIS website ([Santa Cruz HMIS Home \(bitfocus.com\)](http://SantaCruzHMISHome.bitfocus.com)) for the latest training and support schedule.

C. CHO Security Requirements

System Security

1. Equipment Security. A CHO must apply system security provisions to all systems where Personally Identifiable Information (PII) is stored, including, but not limited to, their networks, desktops, laptops, mini-computers, tablets, mobile phones, mainframes, and servers. PII is any information about an individual which can be used to distinguish, trace, or identify their identity, including personal information like name, address, date of birth or social security number.

For CHOs using mobile devices, additional equipment security measures should be put in place for field-based use of devices. HMIS users should only use business rather than personal devices to access HMIS. Mobile devices should be encrypted. This functionality is built into the latest versions of both Android and iOS. Accessing HMIS should be done through a "Private" browsing window, e.g., an "incognito" window in Chrome, or changing the browser's settings to not store form data (aka "autofill") or page caching (not possible on all pages). Devices should enable remote device or profile management by CHO IT administrators. Both iOS and Android include functionality that allow you to locate and, if necessary, wipe lost or compromised devices. Mobile devices should use a built-in cellular connection or a cellular wifi hotspot with an encrypted connection. Public wifi hotspots should NOT be used for connecting to HMIS. A VPN connection should be used to help improve the security of the connection when possible.

2. User Authentication. Each user accessing a machine that contains HMIS data must have a unique username and password that can't be used by or shared with others. Passwords must be at least eight characters long and meet reasonable industry

standard requirements. These requirements include, but are not limited to:

- a. Using at least one number and one letter or symbol
- b. Not using, or including, the username, the HMIS name, vendor's name, or any of these above spelled backwards.
- c. Not consisting entirely of any word found in the common dictionary.

Written information specifically pertaining to user access, e.g., username and password must not be stored or displayed in any publicly accessible location.

Individual users must not be able to log on to more than one workstation at a time or to the network at more than one location at a time.

3. Virus Protection. A CHO must protect HMIS and any electronic device used to store PII from viruses by using commercially available virus protection software. Virus protection must include automated scanning of files as they are accessed by users on the system where the HMIS application is housed. A CHO must regularly update virus definitions from the software vendor.
4. Firewalls. A CHO must protect HMIS and any electronic device used to store PII from malicious intrusion behind a secure firewall. Each individual workstation does not need its own firewall, so long as there is a firewall between that workstation and any systems located outside of the organization, including the Internet and other computer networks.

For example, a workstation that accesses the Internet through a modem would need its own firewall. A workstation that accesses the Internet through a central server would not need a firewall so long as the server has a firewall. Firewalls are commonly included with all new operating systems. Older operating systems can be equipped with secure firewalls that are available both commercially and for free on the internet.
5. Public Access. HMIS and any electronic device used to store PII that use public forums for data collection or reporting must be secured to allow only connections from previously approved computers and systems through Public Key Infrastructure (PKI) certificates, or extranets that limit access based on the Internet Provider (IP) address, or similar means. A public forum includes systems with public access to any part of the computer through the internet, modems, bulletin boards, public kiosks, or similar arenas. The CHO must maintain a fixed Internet Protocol (IP) address.
6. Physical Access to Systems with Access to HMIS Data. A CHO must always staff computers stationed in public areas that are used to collect and store HMIS data. When workstations are not in use and staff are not present, steps should be taken to

ensure that the computers and data are secure and not accessible by unauthorized individuals. Workstations should automatically turn on a password-protected screensaver when the workstation is temporarily not in use for longer than five minutes. Password-protected screensavers are a standard feature with most operating systems and the amount of time can be regulated by a CHO. If staff from a CHO will be gone for more than five minutes from their workstation, staff should log off the data entry system and shut down the computer.

7. *Disaster Protection and Recovery*. The Service Administrator (Bitfocus) copies HMIS data on a regular basis to another medium and stores this data in a secure off-site location where the required security standards apply. The data is stored in a central server in a secure room with appropriate temperature control and fire suppression systems. Surge suppressors are used to protect systems used for collecting and storing all the HMIS data.
8. *Disposal*. To delete all HMIS data from a data storage medium, a CHO must reformat the storage medium. A CHO should reformat the storage medium more than once before reusing or disposing the medium.
9. *System Monitoring*. A CHO must use appropriate methods to monitor security systems. Systems that have access to any HMIS data must maintain a user access log. Many new operating systems and web servers are equipped with access logs and some allow the computer to email the log information to a designated user, usually a system administrator. Logs must be checked routinely to ensure appropriate individuals access and utilize the data. The CHO HMIS Lead is responsible for communicating to end users proper workstation configuration and the importance of protecting access to HMIS data among all Agency users.

Application Security

1. *Applicability*. A CHO must apply application security provisions to the HMIS software during data entry, storage, review, and all other processing functions.
2. *User Authentication*. A CHO must secure all electronic HMIS data with, at a minimum, a user authentication system consisting of a username and a password. Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements are noted earlier in **D. CHO Security Requirements**.
3. *Electronic Data Transmission*. A CHO must encrypt all HMIS data that are electronically transmitted over the Internet, publicly accessible networks, or phone lines to current industry standards. The current standard is 128-bit encryption. Unencrypted data may

be transmitted over secure direct connections between two systems. A secure direct connection is one that can only be accessed by users who have been authenticated on at least one of the systems involved and does not utilize any tertiary systems to transmit the data. A secure network has secure direct connections.

4. Electronic Data Storage. A CHO must store all HMIS data in a binary, not text, format. A CHO that uses one of several common applications, e.g., Microsoft Access, Microsoft SQL Server, or Oracle, are already storing data in binary format and no other steps need to be taken.

Hard Copy Security

1. Applicability. A CHO must secure any paper or other hard copy containing PII that is either generated by or for HMIS, including, but not limited to reports, data entry forms, and case / client notes. Hard copies should be stored in a locked and secure file cabinet in an area not accessible to non-CHO staff.
2. Security. A CHO must always supervise any paper or other hard copy generated by or for HMIS that contains PII when the hard copy is in a public area. This includes by name list reports used to coordinate prioritization and referrals of participants to resources. When CHO staff are not present, the information must be secured in areas that are not publicly accessible. Written information specifically pertaining to user access, e.g., username and password, must not be stored or displayed in any publicly accessible location.

D. CHO Violation of HMIS Operating Policies

Compliance with these Policies and Procedures is mandatory for participation in the Santa Cruz County HMIS system.

Violation of the Policies and Procedures

Violation of the policies and procedures contained within this document may have serious consequences.

1. Any deliberate action resulting in a breach of confidentiality or loss of data integrity will result in the withdrawal of system access for the offending individual.
2. Any unintentional action resulting in a breach of confidentiality or loss of data integrity may result in the withdrawal of system access for the offending individual.

3. All such actions, either intentional or unintentional, must be reported to Bitfocus and H4H for review and resolution via data breach reporting requirements.

HMIS Data Misuse and Breach Reporting

A breach is defined as any of the following:

1. An incident involving unsecured PII, if that PII was, or is reasonably believed to have been accessed or acquired by an unauthorized person
2. A suspected security incident, intrusion, or unauthorized access, use, or disclosure of PII in violation of signed agreements

Breaches must be reported using HMIS Data Misuse and Breach Incident Reporting form (Appendix J) found at santacruz@bitfocus.com.

VI. PRIVACY

A. Consumer Acknowledgement of Privacy Practices

CHO staff are responsible for explaining the CoC's privacy practices to all people experiencing or at risk of homelessness prior to entering their information into the Watsonville/Santa Cruz CoC HMIS. Specific responsibilities include:

1. Ensure that an HMIS Consumer Notice is posted or available at any location consumer intake services are provided and personally identifiable information (PII) is entered into HMIS. Field based workers should have a copy of the notice available for review in the field.
2. Provide consumers with a copy of the CoC Consumer Notice.
3. Request the consumer sign an Acknowledgement of the receipt of the CoC Consumer Notice and upload the signed acknowledgement into the HMIS. If a consumer refuses to sign the Acknowledgement, staff should sign the document and indicate the reasons why the consumer refused to sign the document. Consumer requests for limiting HMIS data collection and entry should be honored and respected given that HMIS data collection is based on consumer self-report. Staff should enter the maximum amount of data into HMIS approved by the consumer. Staff can remove PII for a given client, i.e., name, date of birth, and social security number, if desired. *Anonymous data is preferable to no data collection.*
4. Ensure the Acknowledgement of the receipt of Privacy Practices is current and is signed at least once every three years.

If a consumer is hesitant to sign the Acknowledgement, CHO staff should explain the benefits and value of HMIS participation to the consumer using strategies learned in Bitfocus training and briefly summarized on the Approaches to Responding to Consumer Concerns About Data Sharing (Appendix K) found at santacruz@bitfocus.com. The consumer also has the option to request limitations on the sharing of their information.

B. Allowable HMIS Uses and Disclosures of Consumer Information

A CHO may use or disclose Personally Identifiable Information (PII) from the Santa Cruz County HMIS under the following circumstances:

1. To provide or coordinate services for an individual or household related to keeping or finding a permanent home including coordinated entry activities.
2. Functions related to payment or reimbursement for services and housing provided.
3. To carry out administrative and planning functions, including but not limited to legal, audit, personnel, oversight, required state and federal reporting, and management functions.
4. For creating deidentified PII.

CHOs, like other institutions that maintain personal information about individuals, have obligations that may transcend the privacy interests of consumers. The following additional uses and disclosures recognize those obligations to use or share personal information by balancing competing interests in a responsible and limited way. Under this Policy, these additional uses and disclosures are allowed but not required.

A CHO may also use or disclose PII from the Santa Cruz County HMIS under the following special circumstances:

1. Uses and Disclosures Required by Law. A CHO may use or disclose PII when required by law to the extent that the use or disclosure complies with and is limited to the requirements of the law.
2. Uses and Disclosures to Avert a Serious Threat to Health or Safety. A CHO may, consistent with applicable law and standards of ethical conduct, use or disclose PII if:
 - The CHO, in good faith, believes the use or disclosure is necessary to prevent or

lessen a serious and imminent threat to the health or safety of an individual or the public; and

- The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

3. Uses and Disclosures About Victims of Abuse, Neglect, or Domestic Violence. A CHO may disclose PII about an individual whom the CHO reasonably believes to be a victim of abuse, neglect, or domestic violence to a government authority including a social service or protective services organization authorized by law to receive reports of abuse, neglect, or domestic violence under the following circumstances:

- Where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law;
- If the individual agrees to the disclosure; or
- To the extent that the disclosure is expressly authorized by statute or regulation; and the CHO believes the disclosure is necessary to prevent serious harm to the individual or other potential victims; or if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PII for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure.

A CHO that makes a permitted disclosure about victims of abuse, neglect or domestic violence must promptly inform the individual that a disclosure has been or will be made, except if:

- The CHO, in the exercise of professional judgment, believes informing the individual would place the individual or other individuals at risk of serious harm or
- The CHO would be informing a personal representative, such as a family member or friend, and the CHO reasonably believes the personal representative is responsible for the abuse, neglect, or other injury, and that informing the personal representative would not be in the best interests of the individual as determined by the CHO, in the exercise of professional judgment.

4. Uses and Disclosures for Academic Research or Evaluation Purposes. Any research or evaluation on the nature and patterns of homelessness that uses PII HMIS data will

take place only based on specific agreements between researchers and the HMIS lead agency, H4H. These agreements must be approved by the Housing for Health (H4H) Division staff members according to guidelines approved by the H4H Partnership Policy Board of the CoC and must reflect adequate standards for the protection of confidential data.

Provided H4H Division staff approves, a CHO may use or disclose PII from its own program for academic research or evaluation conducted by an individual or institution that has a formal contractual relationship with the CHO if the research / evaluation is conducted either:

- By an individual employed by or affiliated with the organization for use in a research / evaluation project conducted under a written research / evaluation agreement approved in writing by a CHO program administrator, other than the individual conducting the research or evaluation, designated by the CHO or
- By an institution for use in a research or evaluation project conducted under a written research or evaluation agreement approved in writing by a program administrator designated by the CHO.

A written research or evaluation agreement must:

- Establish rules and limitations for the processing and security of PII during the research or evaluation
- Provide for the return or proper disposal of all PII at the conclusion of the research or evaluation
- Restrict additional use or disclosure of PII, except where required by law and
- Require that the recipient of data formally agree to comply with all terms and conditions of the agreement.

A written research or evaluation agreement is not a substitute for approval of a research project by an Institutional Review Board, Privacy Board, or other applicable human subjects protection institution. Such approval of a proposed research project may be required for some proposed uses of HMIS data. H4H staff members in consultation with the CoC Policy Board will make this determination.

5. Disclosure for Law Enforcement Purposes. A CHO may, consistent with applicable law and standards of ethical conduct, disclose PII for the following law enforcement purposes:
- Legal processes and otherwise required by law
 - Limited information requests for identification and location purposes
 - Pertaining to victims of crime
 - Suspicion that death has occurred because of criminal conduct
 - If a crime occurs on the premises of the CHO and
 - Medical emergency, not on CHO's premises, and it is likely that a crime has occurred.

C. Use of a Comparable Database by Victim Services Providers

Victim services providers, private nonprofit agencies whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking, must not directly enter or provide personally identifying information in the Watsonville/Santa Cruz CoC HMIS if they are legally prohibited from participating in a HMIS. Victim service providers that are recipients of funds requiring participation in the HMIS but are prohibited from entering data in an HMIS, must use a comparable database to enter consumer information. A comparable database is a database that can be used to collect consumer-level data over time and generate unduplicated aggregated reports based on the consumer information entered into the database. The reports generated by a comparable database must be accurate and provide the same information as the reports generated by the Watsonville/Santa Cruz CoC HMIS.

D. End User Conflict of Interest

End users with records in the Watsonville/Santa Cruz CoC HMIS are prohibited from entering or editing information in their own record. All end users are also prohibited from entering or editing information in records of individuals if they have familial or personal relationships with those consumers. All end users must sign the Watsonville/Santa Cruz CoC HMIS End User Agreement, which includes a statement describing this limitation, and report any potential conflict of interest to their Program Director or Executive Director. H4H may run the audit trail report to determine if there has been a violation of the conflict-of-interest agreement.

VII. DATA QUALITY

Data quality is a term that refers to the reliability and validity of consumer-level data in HMIS. It is measured by the extent to which data in the system represents authentic characteristics within a community. With good data quality, the Watsonville/Santa Cruz City & County CoC can accurately provide a full picture of the individuals and families accessing local housing and homelessness response system resources.

Data quality can be measured by data completeness, the extent to which all expected data elements are entered for all consumers; data timeliness, the amount of time that passes between data collection and entry into HMIS, and data accuracy, the extent to which data are entered accurately and consistently.

A. Data Completeness

Complete HMIS data is necessary to fully understand the demographic characteristics and service and housing resource use of persons with information in HMIS and to identify ways to improve services. Complete data facilitates confident reporting and analysis of the experience of homelessness in the CoC region. Data is considered complete if ALL consumers are entered into HMIS and all required data elements are captured.

The CoC's goal is to collect 100% of all data elements; however, it recognizes that this may not be possible in all cases. HUD HMIS data standards expect no null (missing) data for required data elements, and "Don't Know" or "Refused" or "Other" responses should not exceed 5%.

A null or missing rate of below 5 percent represents an ideal goal, and the CoC should work toward accomplishing this level of data completeness for all programs. For large-scale night-by-night shelters, alternate targets for data completeness will be considered based on past performance.

B. Data Accuracy

Data should be entered accurately into HMIS. Accuracy depends on the consumer's ability to provide the data and staff's ability to accurately enter the data in HMIS. Although HMIS data

accuracy can be hard to assess, CHOs should conduct a brief audit or review of active consumer records monthly. The audit should check that data recorded in the consumer file matches data recorded in HMIS (e.g., entry and exit dates, household type, demographic characteristics, and history of homelessness) and that consumer data is in alignment with project characteristics (e.g., a family is not entered in a program for single adult men).

C. Data Consistency

Data consistency refers to all data entry staff understanding, collecting, and entering data consistently across all programs in HMIS. Data consistency requires data entry staff to have a common understanding of each data element, its response categories, and meaning. To facilitate data consistency, H4H in partnership with Bitfocus will ensure the availability of trainings and materials that outline basic data elements, response categories, rationale, and definitions.

D. Data Timeliness

Entering data into HMIS in a timely manner is important because it: facilitates up-to-date information for resource availability, allows data to be accessible when needed (service planning for people experiencing homelessness, monitoring or funding purposes, or for responding to requests for information), and reduces human error that occurs when too much time elapses between the provision of a service (data collection) and data entry. Expectations regarding timely data entry by project type are provided in the Data Quality and Improvement Process and Plan (Appendix H) and can be found at santacruz@bitfocus.com. To ensure that system-wide data is as accurate as possible, all Universal Data Elements and Program-specific Data Elements should be entered according to the standards outlined in that document.

In addition to timely data entry, the CoC requires that CHO staff follow the expectations for conducting assessment as follows:

- Current Living Situation assessments are used to document the housing status during the first interaction with each consumer, and any subsequent consumer interactions if their housing situation changed. All consumers with an active/open HMIS enrollment that experience a significant status change in income, employment, non-cash benefits,

living situation, or other key characteristics require an Update Assessment within 30 days of learning of the status change. At a minimum, the Current Living Situation and Update Assessments must be completed every 90 days even if there are no changes to document. This approach ensures consistency in data collection and reporting on the status of consumers in the system. For audit purposes, Current Living Situation and Update Assessments are considered timely if they occur 30 days prior to or after the quarterly update date or a 60-day window.

- All HMIS enrollments that are active/open require an annual assessment within 30 days of participants' project start anniversary date each year (30 days prior to or after the anniversary date or a 60-day window).

VIII. TECHNICAL SUPPORT

Technical Support is an important component of the success of an HMIS system; Bitfocus is available to provide Technical Support quickly and professionally. Requests for Technical Support may include the reporting of problems with the HMIS Software, requests for enhancements, or other general Technical Support.

The Watsonville/Santa Cruz CoC HMIS Help Desk < [**Santa Cruz HMIS Home \(bitfocus.com\)**](#)> is operated by Bitfocus, the System Administrator, and is available Monday through Friday, 8am to 5pm, except County holidays at [**santacruz@bitfocus.com**](mailto:santacruz@bitfocus.com) or 831.713.2288.

IX. GLOSSARY

Aggregated Public Data: Data that is published and available publicly. This type of data does not identify individual consumers.

Confidential Data: Information that contains personally identifiable information.

Covered Homeless Organization (CHO): Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses, or processes PII on consumers at-risk of or experiencing homelessness for an HMIS. This definition includes both organizations that have direct access to the Watsonville/Santa Cruz CoC HMIS data system, as well as those organizations who do not have direct access but record, use, or process PII.

End User: An individual at a Covered Homeless Organization who has an end user license to enter data into the Watsonville/Santa Cruz CoC HMIS.

HMIS System Administrator: The Watsonville/Santa Cruz CoC HMIS system administrator is Bitfocus. Bitfocus designs the Watsonville/Santa Cruz CoC HMIS, provides ongoing support to the HMIS Lead Agency, and is the vendor for the HMIS software product called Clarity.

Housing for Health (H4H): Division of the County of Santa Cruz Human Services Department that serves as the HMIS Lead Agency for the CoC.

Minimum Data Entry Standards: A mandatory set of data elements that must be collected and entered into the Watsonville/Santa Cruz CoC HMIS for each consumer served by projects. These standards include both the Universal Data Elements (UDEs) and the Program-Specific Data Elements (PSDEs).

Personally Identifiable Information (PII): Any information maintained by or for a CHO about a consumer at-risk of or experiencing homelessness that: (1) identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.

Santa Cruz County Privacy Policy: The Policy that governs allowable uses and disclosures of personally identifiable information for the purposes of the Watsonville/Santa Cruz CoC HMIS.

Santa Cruz CoC Security Policy: The Policy that governs how equipment used to access the Watsonville/Santa Cruz CoC HMIS must be protected from misuse, a breach, or a violation of personally identifiable information.

Watsonville/Santa Cruz CoC HMIS: A web-based database that is used by homeless service organizations across the Watsonville/Santa Cruz CoC to record and store consumer-level information on the characteristics and needs of persons at-risk of or experiencing homelessness.

Shared Data: Unrestricted information entered by one CHO and visible to another CHO using the Watsonville/Santa Cruz CoC HMIS. Shared data also includes data s disclosed from the Watsonville/Santa Cruz CoC HMIS for purposes laid out in the Privacy Policy.

Unpublished Restricted Access Data: Information scheduled, but not yet approved, for publication.

Victim Services Provider: A nonprofit organization whose primary mission is to provide services to victims and survivors of domestic violence, dating violence, sexual assault, or stalking.

APPENDIX A: HMIS CONSUMER INFORMATION SHARING AUTHORIZATION FORM



**Watsonville/Santa Cruz City & County Continuum of Care (CoC)
HMIS CONSUMER INFORMATION SHARING AUTHORIZATION FORM**

This Organization participates in the Housing for Health Partnership (Watsonville/Santa Cruz City & County) CoC Homeless Management Information System (Watsonville/Santa Cruz CoC HMIS).

The Watsonville/Santa Cruz CoC HMIS is used to collect basic information about consumers receiving services from this and other Organizations. This helps: 1) Local Organizations get a more accurate count of individuals and families experiencing or at-risk of homelessness; 2) Identify the need for different services and housing resources in the community; 3) Connect individuals and families at-risk of or experiencing homelessness to the services and housing resources they need; and 4) Secure funding from agencies that request this data as a funding requirement.

The CoC and participating Organizations only collect information that is considered appropriate and necessary. The collection and use of all personal information are guided by strict standards of privacy and security. Every person and agency that is authorized to read or enter information into the HMIS database has signed an agreement to maintain the security and confidentiality of every consumer.

The Protected Personal Information (PPI) and other general information gathered may include, but is not limited, to the following:

Name	Program Start/End Dates	Domestic Violence
Date of Birth	Housing History	Legal History
Social Security Number	Zip Code of Last Permanent Address	Medical history and conditions*
Gender	Family Composition	Mental Health*
Ethnicity and Race	Employment Status	Substance Abuse*
Veteran Status		Photo (if applicable)

HMIS CONSUMER INFORMATION SHARING AUTHORIZATION FORM

By signing this Authorization Form, I understand the following:

- This consent will be valid for 3 years from the date listed below.
- My Protected Personal Information (PPI) is protected by federal, state, and local laws governing confidentiality. *My information, especially my medical, mental health, and substance abuse history, cannot be released outside of the HMIS provider network without my further written consent, unless otherwise allowed by the regulations.
- I may sign this consent form, but I have the right to agree to share only certain or specific information upon my request.
- I may receive services, even if I do not sign this consent form. Providers may not refuse to provide me with services based on my refusal to sign this form, nor will it affect my eligibility for benefits or other supports.
- I may receive a copy of this consent form and the CoC Privacy Policy upon request.
- I have the right to review and receive a copy of my HMIS record, to correct my record, or file a statement of disagreement at any time.
- I may revoke (withdraw) this Consent at any time, but I must do so in writing or by using the Revocation Form. Upon revocation, the CoC will remove my PPI from the HMIS database, but information and data previously obtained cannot be removed entirely.

I have the right to file a grievance against any organization whether I signed this consent or not if I think my privacy rights have been violated. The Grievance Form must be made available or provided to me upon request.

This Organization may use or disclose information without permission from the Watsonville/Santa Cruz CoC HMIS under the following circumstances:

- To provide or coordinate services and housing resources for an individual or families;
- For functions related to payment or reimbursement for services or housing resources;
- To carry out administrative functions;
- When required by law, including a court order;
- For research and/or evaluation purposes; or
- For creating de-identified (anonymous) data.

Please note HMIS policies and laws may change over time and effect the use of data retroactively.

HMIS CONSUMER INFORMATION SHARING AUTHORIZATION FORM

Watsonville/Santa Cruz City & County Continuum of Care (CoC)

SIGNATURE AND ACKNOWLEDGEMENT OF THE HMIS CONSUMER INFORMATION SHARING AUTHORIZATION FORM

By signing this consent form, I authorize the HMIS participating organizations and their representatives to share Protected Personal Information regarding myself and/or my family members for the purposes of assessing my/our needs for housing, utilities, assistance, food, counseling, and/or other supportive services. I have read (or been read) this Consumer Authorization Form, have had the opportunity to ask questions and receive answers to my questions, and I freely consent to having my information (and of any children) entered into the HMIS database.

I acknowledge that I have received a copy of the HMIS Consumer Authorization Form of the Housing for Health Partnership CoC.

_____	OR	_____
Consumer Name (Please Print)		Name of Personal Representative
_____		_____
Consumer Signature		Signature of Personal Representative
_____		_____
Date		Relationship to Consumer

		Date

HMIS CONSUMER INFORMATION SHARING AUTHORIZATION FORM

Program Use Only

1. I attempted to obtain written authorization of the Consumer Information Sharing Authorization Form, but acknowledgement could not be obtained because:
 - An emergency prevented us from obtaining authorization
 - A communication barrier prevented us from obtaining authorization
 - The individual was unwilling to sign
 - The interaction was completed over the phone or remotely and verbal authorization was obtained; written authorization will be obtained as soon as possible.
 - Other: _____

2. The consumer requested the following data sharing limitations:
 - No limitations requested **OR**
 - Check one or more of the following requested limits:
 - De-identified or anonymized data
 - Limited responses to some questions

Staff Member Printed Name

Staff Member Signature

Date

Note to Staff: Please ensure a signed copy of this form is uploaded into HMIS **prior to** entering consumer information in HMIS.

APPENDIX B: CONSUMER NOTICE



Watsonville/Santa Cruz City & County Continuum of Care (CoC) HMIS CONSUMER NOTICE

This Organization provides services for individuals and families at-risk of or experiencing homelessness. This Organization participates in the Housing for Health Partnership (Watsonville/Santa Cruz City & County) CoC Homeless Management Information System (Watsonville/Santa Cruz CoC HMIS).

The Watsonville/Santa Cruz CoC HMIS is used to collect basic information about consumers receiving services from this Organization. This helps the Organization get a more accurate count of individuals and families experiencing homelessness and identify the need for different services and housing resources. The information also helps to connect individuals and families at-risk of or experiencing homelessness to the services and housing resources they need.

This Organization only collects information that is considered appropriate and necessary. The collection and use of all personal information are guided by strict standards of privacy and security. HMIS policies may change over time and effect the use of data retroactively.

This Organization may use or disclose information from the Watsonville/Santa Cruz CoC HMIS under the following circumstances:

- To provide or coordinate services and housing resources for an individual or families;
- For functions related to payment or reimbursement for services or housing resources;
- To carry out administrative functions;
- When required by law;
- For research and/or evaluation; or
- For creating de-identified (anonymous) data.

A copy of the Watsonville/Santa Cruz City & County CoC Privacy Policy, describing allowable uses and disclosures of data collected for the purposes of the Watsonville/Santa Cruz CoC HMIS is available to all consumers upon request.

APPENDIX C: ORGANIZATION PARTNERSHIP & DATA SHARING AGREEMENT



Watsonville/Santa Cruz City & County Continuum of Care (CoC) Homeless Management Information System (HMIS) Organization Partnership and Data Sharing Agreement

I. Purpose

The Watsonville/Santa Cruz City & County CoC's Covered Homeless Organizations (CHOs) utilize a computerized record-keeping system that captures information about people experiencing or at-risk of homelessness. The Watsonville/Santa Cruz City & County CoC Homeless Management Information System (Watsonville/Santa Cruz CoC HMIS) creates an unduplicated count of individuals and households at-risk of or experiencing homelessness and develops aggregate information that assists in developing policies to end homelessness. In addition, the Watsonville/Santa Cruz CoC HMIS allows CHOs to share information electronically about consumers, including their service needs, to better coordinate services.

II. Definition of Terms

The lead entity for the CoC implementation of HMIS is the County of Santa Cruz Human Services Department Housing for Health Division (H4H) and the system is administered by Bitfocus, the "HMIS System Administrator." In this Agreement, H4H is the "CoC HMIS Administrative Entity", "Covered Homeless Organization (CHO)" is an organization participating in HMIS, "Consumer" is a consumer of services, "Personally Identifiable Information (PII)" is information that (1) identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.

III. Audience and Agreement

This organizational partnership and data sharing agreement ("Agreement") permits the CHO listed below and its approved and designated users to access HMIS on their business computers and system through an internet connection. The HMIS users are the guardians entrusted with personal data to be entered and used in the HMIS on behalf of consumers. The CoC HMIS Administrative Entity has a primary function to manage the HMIS in partnership with its contracted HMIS System Administrator.

Prioritized access to HMIS user licenses will be given to agencies and programs receiving federal or state funding that require HMIS participation, those that have contracts with the County of Santa Cruz Human Services Department Housing for Health Division, or those with Central California Alliance for Health community supportive services housing contracts. To qualify as an HMIS using agency, agencies must be able to meet the insurance and other contractual requirements associated with receiving funding from one or more of the above

Organization Partnership and Data Sharing Agreement

public funding sources.

PII is shared between and among CHOs that have established this Agreement with the CoC HMIS Administrative Entity. All CHOs granted access to HMIS must agree to abide by all relevant federal and state laws, and the CoC adopted HMIS Policies and Procedures pertaining to client confidentiality, user conduct, security, and the ongoing functionality and stability of services and equipment used to support HMIS.

A list of current organizations covered by this Agreement can be found at <https://santacruz.bitfocus.com/participating-agencies> . Please note that this list is updated over time.

The signature of the Executive Director or authorized designee of the CHO indicates agreement with the terms set forth for an HMIS account for the CHO.

IV. CHO HMIS General Responsibilities

The CHO is responsible for ensuring that its users comply with the requirements laid out in the CoC Privacy Policy and the CoC Security Policy. The CHO shall ensure that all staff issued a User ID and password for HMIS will comply with the following:

- A. Read and abide by this Organization Partnership [Agreement](#);
- B. Read and abide by the Santa Cruz County HMIS Policies and [Procedures](#);
- C. Read and sign the Santa Cruz County HMIS User Agreement and Code of [Ethics](#);
- D. Participate in new user privacy and security training and on-going security training on an annual [basis](#);
- E. Participate in additional trainings as required by the Santa Cruz County HMIS Administrative [Entity](#);
- F. Maintain a unique User ID and password, and not share or reveal that information to [anyone](#);

The CHO shall conduct background checks on all staff before referring potential users to attend a new user training and onboarding process. Individuals with a history of perpetrating fraud, identity theft, or misuse of confidential information, or an individual who is under investigation for such issues, shall not be permitted a user license.

The CHO is responsible for ensuring that its staff do not misuse the HMIS. Such misuses include and are not limited [to](#): damage of computing resources, obtaining unauthorized resources, taking resources from another user, gaining unauthorized access to resources, or otherwise using computing resources without proper authorization.

Any user who finds a possible security lapse on the system is obligated to report it to the HMIS System Administrator immediately. They will notify the Watsonville/Santa Cruz CoC

Organization Partnership and Data Sharing Agreement

HMIS Help Desk < [Santa Cruz HMIS Home \(bitfocus.com\)](mailto:santacruz@bitfocus.com)> | 831.713.2288) immediately of any breach, use, or disclosure of PII not provided for by this Agreement or the CoC Privacy Policy. Within one business day, they will have submitted the HMIS Data Misuse and Breach Reporting form to: santacruz@bitfocus.com.

V. CHO Confidentiality and Informed Consent Responsibilities

The CHO agrees to abide by and uphold all privacy protection standards established for HMIS as well as their respective CHO's privacy and security procedures. The CHO will uphold relevant federal and state confidentiality regulations and laws protecting consumer records and information. The CHO will only release CHO consumer records outside of the HMIS provider network with written consent from the consumer, or the consumer's guardian, unless otherwise provided for in the HMIS policies and procedures and relevant federal and state laws. Access to HMIS is granted to the CHO listed below based on the following premises:

Oral Explanation: All consumers will be provided an oral explanation stating their information will be entered into a computerized record keeping system. The CHO will provide an oral explanation of the HMIS and informing consumers of how their information will be used, stored, and shared. The CHO is responsible for ensuring this procedure takes place prior to entering consumer PII into HMIS. The CHO shall arrange for a qualified interpreter or translator if an individual is not literate in English or has difficulty understanding the CoC Privacy Policy.

Written Explanation: Each consumer with PII information entered into HMIS should receive a copy of the HMIS consumer notice explaining HMIS and how HMIS data is used and shared. Consumers should sign an acknowledgement of receiving this information and a copy of this signed acknowledgement should be uploaded into the consumer's HMIS file.

Information Release: The CHO agrees not to release PII to any organization outside of participating HMIS CHOs without proper client consent except as provided by federal and state law or in circumstances outlined in the HMIS Privacy Policy.

Postings: The CHO must post a copy of the HMIS consumer notice at each intake desk or comparable location. Copies of notices must be made available to consumers upon their request.

VI. CHO Data Management Responsibilities

1. The CHO shall use the system to provide or coordinate services, link consumers with housing resources, to develop reports and provide data, or to conduct program

Organization Partnership and Data Sharing Agreement

evaluation, research, and improvement. PII will only be used and disclosed in accordance with the CoC HMIS Privacy Policy.

2. The CHO understands that all consumer data will be maintained on a remote, central server, which will contain all consumer information in an encrypted state. All PII is inaccessible to unauthorized users.
3. CHOs are bound by all restrictions placed upon the data by request from the consumer. The CHO shall diligently record in HMIS all consumer restrictions requested.
4. The CHO shall not knowingly enter false or misleading data under any circumstances.
5. The CHO shall maintain appropriate documentation of receipt of HMIS Consumer Notice and Acknowledgement, and this Acknowledgement must be updated every (3) three years.
6. The CHO shall consistently enter information into the HMIS database and will strive for real-time data entry. Data must be entered into the HMIS database within two business days, as outlined by the Santa Cruz Data Quality Improvement Process and Plan.
7. The CHO will not alter information in the HMIS database that is entered by another covered homeless organization with inaccurate information, i.e., CHO will not purposefully enter inaccurate information to over-ride information entered by another CHO.
8. The CHO shall not include profanity or offensive language in the HMIS database. This does not apply to the input of direct quotes by the consumer if the Organization believes that it is essential to enter these comments for assessment, service, and treatment purposes.
9. The CHO shall utilize the HMIS database for business purposes only.
10. The CHO shall not use the HMIS database with intent to defraud federal, state, or local governments, individuals, or entities, or to conduct any illegal activity.
11. The CHO may make aggregate data without PII available to other entities for funding or planning purposes pertaining to providing services to persons experiencing or at-risk of homelessness.
12. Once a report containing PII is downloaded from HMIS, it is the responsibility of the CHO to ensure the appropriate security protections of this data.
13. Consumers have the right to request information about to whom their PII is released in the Watsonville/Santa Cruz City & County CoC's CHOs.
14. The CHO will resist, through judicial proceedings, any judicial or quasi-judicial effort to obtain access to PII pertaining to consumers, unless expressly provided for in state and/or federal regulations.
15. CHOs will notify County H4H staff of their intent to terminate their participation in this Agreement.

Organization Partnership and Data Sharing Agreement

VII. CoC HMIS Administrative Entity Rights

The CoC HMIS Administrative Entity reserves all rights, including HMIS system audit access, termination of agreements, of the HMIS application and the service resources that it owns and/or operates on behalf of the CoC. These procedures shall not be construed as a waiver of any rights of the CoC HMIS Administrative Entity or the CHO, nor shall they conflict with applicable acts of law.

VIII. Violations

An individual violating any of the guidelines outlined in this agreement will be reported immediately upon discovery. Such suspected violations will be confidentially reported to the CoC HMIS Administrative Entity or the HMIS System Administrator as outlined in the HMIS Policies and Procedures.

If this Agreement is terminated, the Watsonville/Santa Cruz City & County CoC shall maintain the right to the use of all consumer data previously entered by the terminating CHO; this use is subject to any restrictions laid out in the CoC Privacy Policy.

VIII. Agreement Terms and Conditions

- A. The County shall not transfer or assign any rights or obligations without the written consent of the other party.
- B. This Agreement shall be in-force until revoked in writing by either party provided funding is available.
- C. This Agreement may be terminated with 30 days written notice.
- D. A violation of the above will result in immediate disciplinary action by the Watsonville/Santa Cruz City & County CoC.

Organization Partnership and Data Sharing Agreement

HMIS - Organization Partnership and Data Sharing Agreement Signatory Page

This Agreement is executed between the CHO listed below, the CoC HMIS Administrative Entity, and the HMIS System Administrator. The Executive Director or authorized signatory for each entity will sign this Agreement. I have read this HMIS Organization Partnership and Data Sharing Agreement and commit to ensuring staff from our CHO will utilize HMIS in accordance with the HMIS Policies and Procedures.

_____	_____
CHO Executive Director or Designee Signature	Date
_____	_____
CHO Executive Director or Designee Printed Name	Organization Name
_____	_____
CoC HMIS System Administrator Signature	Date
_____	_____
CoC HMIS System Administrator Printed Name	Organization Name
_____	_____
CoC HMIS System Administrative Entity Signature	Date
_____	_____
CoC HMIS System Administrative Entity Printed Name	Organization Name

APPENDIX D: PARTICIPATING COVERED HOMELESS ORGANIZATIONS



**Watsonville/Santa Cruz City & County Continuum of Care (CoC)
Interorganizational Data Sharing
Participating Covered Homeless Organizations**

The following Organizations have signed a CoC Interorganizational Data Sharing and Coordinated Services Agreement to use and disclose consumer-level information through the Watsonville/Santa Cruz City & County CoC Homeless Management Information System (Watsonville/Santa Cruz CoC HMIS) for the purposes of coordinating and providing services to consumers. Please note that this list of Organizations may change over time.

- | | |
|---|---|
| Association of Faith Communities | Housing Matters |
| Bill Wilson Center | Janus of Santa Cruz |
| Cabrillo College | Mental Health Client Action Network |
| Central Coast Center for Independent Living | Nation's Finest |
| City of Santa Cruz | <u>Pajaro</u> Rescue Mission |
| Community Action Board of Santa Cruz County | <u>Pajaro</u> Valley Shelter Services |
| Community Bridges | Salvation Army |
| Downtown Streets Team | <u>Salud Para La Gente</u> |
| Encompass Community Services | Santa Cruz Community Health Centers |
| Families In Transition | Santa Cruz County Health Services Agency |
| Front Street Housing, Inc. | Santa Cruz County Human Services Department |
| Homeless Garden Project | Santa Cruz Public Libraries |
| Housing Authority of the County of Santa Cruz | Siena House |
| Housing Choices | US Department of Veterans Affairs |
| | Wings Homeless Advocacy |

Consumer personally identifiable information (PII) is bound by strict confidentiality, through the CoC Privacy Policy and CoC Consumer Notice.

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APPENDIX E: PRIVACY POLICY



Watsonville/Santa Cruz City & County Continuum of Care (CoC) Homeless Management Information System (HMIS) Privacy Policy

This Policy describes standards for the privacy of personally identifiable information (PII) collected and stored in the Watsonville/Santa Cruz City & County CoC HMIS. The standards seek to protect the confidentiality of personal information while allowing for reasonable, responsible, and limited uses and disclosures of data that support efforts to prevent and end homelessness in the County. This HMIS Privacy Policy (hereinafter referred to as "Policy") is based on principles of fair information practices recognized by the information privacy and technology communities and federal Housing and Urban Development (HUD) department HMIS guidance: (<https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf>).

This Policy defines the privacy standards required of any organization within the CoC that records, uses, or processes personally identifiable information (PII) on consumers at-risk of or experiencing homelessness for the Watsonville/Santa Cruz CoC HMIS. Organizations must also comply with federal, state, and local laws that require additional confidentiality protections, where applicable.

This Policy recognizes the broad diversity of organizations participating in HMIS, and the differing programmatic and organizational realities that may demand a higher standard for some activities. Some organizations, e.g., such as those serving victims of domestic violence, may choose to implement higher levels of privacy standards because of the nature of the consumers served or specific services provided. Others, e.g., large emergency shelters, may find higher standards overly burdensome or impractical. At a minimum, however, all organizations must meet the privacy standards described in this Policy. This Policy provides a uniform minimum standard of data privacy and security protection for consumers at-risk of or experiencing homelessness with the possibility of more restrictive protections for organizations with additional needs or capacities.

The following sections discuss the Watsonville/Santa Cruz CoC HMIS privacy standards.

Watsonville/Santa Cruz CoC HMIS Privacy Standards: Definition of Terms

1. *Personally Identifiable Information (PII)*: Any information maintained by or for a Covered Homeless Organization about a consumer at-risk of or experiencing homelessness that: (1) identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.

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2. *Covered Homeless Organization (CHO):* Any organization, including its employees, volunteers, affiliates, contractors, and associates, that records, uses, or processes PII on consumers at-risk of or experiencing homelessness for HMIS. This definition includes both organizations that have direct access to HMIS, as well as those organizations who do not have direct access but do record, use, or process PII from HMIS.
3. *Processing:* Any operation or set of operations performed on PII, whether by automated means or not, including but not limited to collection, maintenance, use, disclosure, transmission, and destruction of the information.
4. *Watsonville/Santa Cruz CoC HMIS Uses and Disclosures:* The uses and disclosures of PII that are allowed by this Policy.
5. *Uses and Disclosures:* Uses are those activities internal to any given CHO that involves interaction with PII, whereas disclosures are those activities in which a CHO shares PII externally with non-CHO entities

Applying the Watsonville/Santa Cruz CoC HMIS Privacy Policy

This Policy applies to any Covered Homeless Organization (CHO) that records, uses, or processes personally identifiable information (PII) for the Watsonville/Santa Cruz CoC HMIS. All PII maintained by a CHO is subject to these standards.

Allowable HMIS and CES Uses and Disclosures of Personally Identifiable Information (PII)

Consumer consent for any uses and disclosures defined in this section is assumed when organizations follow HUD HMIS Standards for notifying consumers of privacy policies. See Appendix E.1. for specific policy associated with Runaway and Homeless Youth (RHY) programs and services.

A CHO may use or disclose PII from the Watsonville/Santa Cruz CoC HMIS under the following circumstances:

1. To provide or coordinate services for an individual or household related to assistance with keeping or finding a permanent home;
2. For functions related to payment or reimbursement for services;
3. To carry out administrative and planning functions, including but not limited to legal, audit, personnel, oversight, required state and federal reporting, and management functions; or
4. For creating deidentified PII. CHOs, like other institutions that maintain personal information about individuals, have obligations that may transcend the privacy interests of consumers. The following additional uses and disclosures recognize those obligations to use or share personal information by balancing competing interests in a responsible and limited way. Under this Policy, these additional uses and disclosures

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are permissive and not mandatory except for first party access to information and any required disclosures for oversight of compliance with this Policy. However, nothing in this Policy modifies an obligation under applicable law to use or disclose personal information.

A CHO may also use or disclose PII from the Watsonville/Santa Cruz CoC HMIS under the following special circumstances:

Uses and Disclosures Required by Law. A CHO may use or disclose PII when required by law to the extent that the use or disclosure complies with and is limited to the requirements of the law.

Uses and Disclosures to Avert a Serious Threat to Health or Safety. A CHO may, consistent with applicable law and standards of ethical conduct, use or disclose PII if:

1. The CHO, in good faith, believes the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and
2. The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

Uses and Disclosures About Victims of Abuse, Neglect, or Domestic Violence. A CHO may disclose PII about an individual whom the CHO reasonably believes to be a victim of abuse, neglect, or domestic violence to a government authority including a social service or protective services organization authorized by law to receive reports of abuse, neglect, or domestic violence under the following circumstances:

1. Where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law;
2. If the individual agrees to the disclosure; or
3. To the extent that the disclosure is expressly authorized by statute or regulation; and the CHO believes the disclosure is necessary to prevent serious harm to the individual or other potential victims; or if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PII for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure.

A CHO that makes a permitted disclosure about victims of abuse, neglect or domestic violence must promptly inform the individual that a disclosure has been or will be made, except if:

1. The CHO, in the exercise of professional judgment, believes informing the individual would place the individual at risk of serious harm; or

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2. The CHO would be informing a personal representative, such as a family member or friend, and the CHO reasonably believes the personal representative is responsible for the abuse, neglect, or other injury, and that informing the personal representative would not be in the best interests of the individual as determined by the CHO, in the exercise of professional judgment.

Uses and Disclosures for Academic Research or Evaluation Purposes. Any research or evaluation on the nature and patterns of homelessness that uses PII HMIS data will take place only based on specific agreements between researchers and the HMIS lead agency, the Housing for Health Division of the County of Santa Cruz Human Services Department. These agreements must be approved by the Housing for Health (H4H) Partnership staff members according to guidelines approved by the H4H Partnership (CoC) Policy Board and must reflect adequate standards for the protection of confidential data.

Provided H4H approves, a CHO may use or disclose PII from its own program for academic research or evaluation conducted by an individual or institution that has a formal relationship with the CHO if the research / evaluation is conducted either:

1. By an individual employed by or affiliated with the organization for use in a research / evaluation project conducted under a written research / evaluation agreement approved in writing by a program administrator, other than the individual conducting the research or evaluation, designated by the CHO; or
2. By an institution for use in a research or evaluation project conducted under a written research or evaluation agreement approved in writing by a program administrator designated by the CHO.

A written research or evaluation agreement must:

1. Establish rules and limitations for the processing and security of PII in the course of the research or evaluation;
2. Provide for the return or proper disposal of all PII at the conclusion of the research or evaluation;
3. Restrict additional use or disclosure of PII, except where required by law; and
4. Require that the recipient of data formally agree to comply with all terms and conditions of the agreement.

A written research or evaluation agreement is not a substitute for approval of a research project by an Institutional Review Board, Privacy Board, or other applicable human subjects protection institution.

Disclosure for Law Enforcement Purposes. A CHO may, consistent with applicable law and standards of ethical conduct, disclose PII for the following law enforcement purposes:

1. Legal processes and otherwise required by law;
2. Limited information requests for identification and location purposes;

3. Pertaining to victims of crime;
4. Suspicion that death has occurred as a result of criminal conduct;
5. If a crime occurs on the premises of the CHO; and
6. Medical emergency, not on CHO's premises, and it is likely that a crime has occurred.

Privacy Requirements

All CHOs involved with the Watsonville/Santa Cruz CoC HMIS must comply with the privacy requirements described in this Notice with respect to:

1. Data collection limitations;
2. Data quality;
3. Purpose and use limitations;
4. Openness;
5. Access and correction; and
6. Accountability.

A CHO must comply with federal, state, and local laws that require additional confidentiality protections. All additional protections must be described in the CHO's privacy notice. A CHO must comply with all privacy protections in this Notice and with all additional privacy protections included in its organization specific privacy notice, where applicable.

A CHO may maintain a common data storage medium with another organization, including but not limited to another CHO, that includes the sharing of PII. When PII is shared between organizations, responsibilities for privacy may reasonably be allocated between the organizations. Organizations sharing a common data storage medium and PII may adopt differing privacy policies as they deem appropriate, administratively feasible, and consistent with this Policy, which allows for the de-duplication of consumers at-risk of or experiencing homelessness at the CoC level.

Data Collection Limitations

A CHO may collect PII only when appropriate to the purposes for which the information is obtained or when required by law. A CHO must collect PII by lawful and fair means and, where appropriate, with the knowledge of the individual. A CHO must post a sign at each intake desk or comparable location that explains generally the reasons for collecting this information (Watsonville/Santa Cruz City & County CoC Consumer Notice). Consent of the individual for data collection may be assumed when the Watsonville/Santa Cruz City & County CoC Consumer Notice is made available to each consumer prior to data collection, a consumer acknowledges receipt of the Notice via a signed acknowledgement form, and the notice is properly displayed and made available according to this Policy.

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Data Quality

PII collected by a CHO must be relevant to the purpose for which it is to be used. To the extent necessary for those purposes, PII should be accurate, complete, and timely, as defined by the Santa Cruz County Data Quality Improvement Process and Plan. A CHO must develop and implement a plan to dispose of, or remove identifiers from, PII that is not in current use after the PII was created or last changed unless a statutory, regulatory, contractual, or other requirement mandates longer retention.

Purpose and Use Limitations

A CHO may use or disclose PII only if the use or disclosure is allowed by this Policy. A CHO may assume consent for all uses and disclosures specified in this Policy and for uses and disclosures determined by the CHO to be compatible with those specified in this Policy. This Policy limits the disclosure of PII to the minimum information necessary to accomplish the purpose of the disclosure. Uses and disclosures not specified in this Notice can be made only with the consent of the consumer or when required by law.

A CHO processing PII for the purposes of the Watsonville/Santa Cruz CoC HMIS will agree to additional restrictions on the use or disclosure of the consumer's PII at the request of the consumer, where it is reasonable to do so. This can include, but is not limited to, the following additional restrictions:

1. Entering consumer PII into the Watsonville/Santa Cruz CoC HMIS so that it is not shared with any other CHO; or
2. Using de-identified consumer information when coordinating services through HMIS; or
3. Limiting responses to HMIS questions to those the consumer is willing to share with other CHOs.

A CHO, in the exercise of professional judgment, will communicate with a consumer who has requested additional restrictions, when it is reasonable to agree to these and alternatives in situations where it is not reasonable.

Openness

A CHO must adhere to this Policy describing its practices for the processing of PII and must provide a copy of this Policy to any individual upon request. A CHO must physically post the HMIS CoC Consumer Notice stating the availability of this Policy to any individual who requests a copy.

This Policy may be amended at any time and amendments may affect PII obtained by a CHO before the date of the change. An amendment to this Policy regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated.

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CHOs are obligated to provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include but is not limited to, providing qualified sign language interpreters, readers, or materials in accessible formats such as Braille, audio, or large type, as needed by the individual with a disability. See 24 CFR 8.6; 28 CFR 36.303. Note: This obligation does not apply to CHOs who do not receive federal financial assistance and who are also exempt from the requirements of Title III of the Americans with Disabilities Act because they qualify as "religious entities" under that Act.

In addition, CHOs that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program. See *HUD Limited English Proficiency Recipient Guidance* published on December 18, 2003 (68 FR 70968).

Access and Correction

In general, a CHO must allow an individual to inspect and to have a copy of any PII about the individual. A CHO must offer to explain any information that the individual may not understand. A CHO must consider any request by an individual for correction of inaccurate or incomplete PII pertaining to the individual. A CHO is not required to remove any information but may, in the alternative, mark information as inaccurate or incomplete and may supplement it with additional information.

A CHO may reserve the ability to rely on the following reasons for denying an individual inspection or copying of the individual's PII:

1. Information compiled in reasonable anticipation of litigation or comparable proceedings;
2. Information about another individual other than a health care or homeless provider would be compromised;
3. Information obtained under a promise of confidentiality, other than a promise from a health care or homeless provider, if disclosure would reveal the source of the information; or
4. Information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.

A CHO can reject repeated or harassing requests for access or correction. A CHO that denies an individual's request for access or correction must explain the reason for the denial to the individual and must include documentation of the request and the reason for the denial as part of the PII about the individual.

Accountability

A CHO must establish a procedure for collecting questions or complaints about this Policy to share with Housing for Health, the HMIS lead agency. Housing for Health requires each HMIS

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user, including employees, volunteers, affiliates, contractors, and associates, to sign a confidentiality agreement that acknowledges receipt of a copy of this Policy and that pledges to comply with this Policy. Users must complete a Privacy Training and pass a knowledge-based quiz prior to granting them HMIS access. This training must be completed annually.

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Appendix E.1

This appendix addresses special considerations for Runaway and Homeless Youth (RHY) Program service providers, per the [RHY Program HMIS Manual](#).

No Consent Required for Data Collection

Data collection is the process of collecting and entering information into the Watsonville/Santa Cruz CoC HMIS by RHY program staff. All RHY projects are required to collect specific data elements, including the HUD Universal Data Elements and program-specific data elements for the RHY-funded project for which they receive funding (Street Outreach Program, Basic Center Program, Transitional Living Program).

The Runaway and Homeless Youth Act requires that a RHY grantee “keep adequate statistical records profiling the youth and family members whom it serves (including youth who are not referred to out-of-home shelter services).”

RHY grantees are not required to obtain youth or parental consent to collect and enter youth data into the Watsonville/Santa Cruz CoC HMIS.

Consent Needed for Data Sharing

Data sharing refers to the sharing of consumer information per the Policy laid out in this document. For RHY grantees, data can only be shared if written consent is obtained from the parent or legal guardian of a youth who is under age 18, or with written consent from a youth who is 18 or older.

The RHY rule states the following regarding data sharing: Pursuant to the Act, no records containing the identity of individual youth served by a Runaway and Homeless Youth grantee may be disclosed except:

1. For Basic Center Program grants, records maintained on individual youth shall not be disclosed without the informed consent of the youth and parent or legal guardian to anyone other than another organization compiling statistical records, or a government organization involved in the disposition of criminal charges against the [youth](#);
2. For Transitional Living Programs, records maintained on individual youth shall not be disclosed without the informed consent of the youth to anyone other than an organization compiling statistical [records](#);
3. Research, evaluation, and statistical reports funded by grants provided under section 343 of the Act are allowed to be based on individual youth data, but only if such data are de-identified in ways that preclude disclosing information on identifiable [youth](#);
4. Youth served by a Runaway and Homeless Youth grantee shall have the right to review their records; to correct a record or file a statement of disagreement; and to be apprised of the individuals who have reviewed their [records](#);
5. The Department of Health and Human Services (HHS) policies regarding confidential

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information and experimentation and treatment shall not apply if HHS finds that state law is more protective of the rights of youth:

6. Procedures shall be established for the training of RHY program staff in the protection of these rights and for the secure storage of records. 45 CFR § 1351.21.

Special Consideration for RHY-Funded Programs

In consideration of the guidance laid out in the RHY Program HMIS Manual, RHY-funded grantees shall enter data into the Watsonville/Santa Cruz CoC HMIS for youth served and seeking services that will not be shared with any other CHO, unless the grantee receives written consent from the youth or parent / legal guardian of the youth served that allows the disclosure of the youth's PII for the permissible purposes laid out in this Policy.

APPENDIX F: SECURITY POLICY



Watsonville/Santa Cruz City & County Continuum of Care (CoC) Homeless Management Information System (HMIS) Security Policy

This Policy describes standards for the security of personally identifiable information collected and stored in the Watsonville/Santa Cruz City & County CoC HMIS. The standards seek to ensure the security of personal information. This Security Policy ("Policy") is based on principles of fair information practices recognized by the information security and technology communities and federal Housing and Urban Development (HUD) department HMIS guidance:

(<https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf>).

This Policy defines the security standards required of any organization within the CoC that records, uses, or processes personally identifiable information (PII) on consumers at-risk of or experiencing homelessness for HMIS. Organizations must also comply with federal, state, and local laws that require additional security protections, where applicable.

This Policy recognizes the broad diversity of organizations participating in HMIS, and the differing programmatic and organizational realities that may demand a higher standard for some activities. Some organizations, e.g., such as those serving victims of domestic violence, may choose to implement higher levels of security standards because of the nature of the consumers served or specific services provided. Others, e.g., large emergency shelters, may find higher standards overly burdensome or impractical. At a minimum, however, all organizations must meet the security standards described in this Policy. This approach provides a uniform *minimum standard* of data privacy and security protection for consumers at-risk of or experiencing homelessness with the possibility of more restrictive protections for organizations with additional needs or capacities.

The following sections discuss HMIS security standards.

HMIS Security Standards: Definitions

1. *Personally Identifiable Information (PII)*: Any information maintained by or for a Covered Homeless Organization about a consumer at-risk of or experiencing homelessness that: (1) Identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.
2. *Covered Homeless Organization (CHO)*: Any organization, including its employees, volunteers, affiliates, contractors, and associates, that records, uses, or processes PII on consumers at-risk of or experiencing homelessness for HMIS. This definition

includes both organizations that have direct access to HMIS, as well as those organizations who do not, but do record, use, or process PII from HMIS.

3. *Processing*: Any operation or set of operations performed on PII, whether by automated means or not, including but not limited to collection, maintenance, use, disclosure, transmission, and destruction of the information.

Security Standards

This section describes the standards for system, application, and hard copy security. All CHOs must comply with these requirements.

System Security

1. *Equipment Security*. A CHO must apply system security provisions to all the systems where PII is stored, including, but not limited to, a CHO's networks, desktops, laptops, mini-computers, mainframes, and servers. A CHO must apply system security provisions to all systems where Personally Identifiable Information (PII) is stored, including, but not limited to, their networks, desktops, laptops, mini-computers, tablets, mobile phones, mainframes, and servers. PII is any information about an individual which can be used to distinguish, trace, or identify their identity, including personal information like name, address, date of birth or social security number.

For CHOs using mobile devices, additional equipment security measures should be put in place for field-based use of devices. HMIS users should only use business rather than personal devices to access HMIS. Mobile devices should be encrypted. This functionality is built into the latest versions of both Android and iOS. Accessing HMIS should be done through a "Private" browsing window, e.g., an "incognito" window in Chrome, or changing the browser's settings to not store form data (aka "autofill") or page caching (not possible on all pages). Devices should enable remote device or profile management by CHO IT administrators. Both iOS and Android include functionality that allow you to locate and, if necessary, wipe lost or compromised devices. Mobile devices should use a built-in cellular connection or a cellular ~~wifi~~ hotspot with an encrypted connection. Public ~~wifi~~ hotspots should NOT be used for connecting to HMIS. A VPN connection should be used to help improve the security of the connection when possible.

2. *User Authentication*. Each user accessing a machine that contains HMIS data must have a unique username and password. Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:
 - a. Using at least one number and one letter or symbol;
 - b. Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and / or
 - c. Not consisting entirely of any word found in the common dictionary or any of

the above spelled backwards.

Written information specifically pertaining to user access, e.g., username and password must not be stored or displayed in any publicly accessible location. Individual users must not be able to log on to more than one workstation at a time or be able to log on to the network at more than one location at a time.

3. Virus Protection. A CHO must protect HMIS and any electronic device used to store PII from viruses by using commercially available virus protection software. Virus protection must include automated scanning of files as they are accessed by users on the system where the HMIS application is housed. A CHO must regularly update virus definitions from the software vendor.
4. Firewalls. A CHO must protect HMIS and any electronic device used to store PII from malicious intrusion behind a secure firewall. Each individual workstation does not need its own firewall, so long as there is a firewall between that workstation and any systems, including the Internet and other computer networks, located outside of the organization.
For example, a workstation that accesses the Internet through a modem would need its own firewall. A workstation that accesses the Internet through a central server would not need a firewall so long as the server has a firewall. Firewalls are commonly included with all new operating systems. Older operating systems can be equipped with secure firewalls that are available both commercially and for free on the internet.
5. Public Access. HMIS and any electronic device used to store PII that use public forums for data collection or reporting must be secured to allow only connections from previously approved computers and systems through Public Key Infrastructure (PKI) certificates, or extranets that limit access based on the Internet Provider (IP) address, or similar means. A public forum includes systems with public access to any part of the computer through the internet, modems, bulletin boards, public kiosks or similar arenas.
6. Physical Access to Systems with Access to HMIS Data. A CHO must always staff computers stationed in public areas that are used to collect and store HMIS data. When workstations are not in use and staff are not present, steps should be taken to ensure that the computers and data are secure and not usable by unauthorized individuals. Workstations temporarily not in use should automatically turn on a password-protected screensaver. Password-protected screensavers are a standard feature with most operating systems and the amount of time can be regulated by a CHO. If staff from a CHO will be gone for an extended period, staff should log off the data entry system and shut down the computer.
7. Disaster Protection and Recovery. HMIS data is copied on a regular basis to another medium and stored in a secure off-site location where the required security standards apply. The CHO that stores the data (Bitfocus) in a central server stores that central server in a secure room with appropriate temperature control and fire suppression systems. Surge suppressors are used to protect systems used for collecting and storing all the HMIS data.

8. Disposal. To delete all HMIS data from a data storage medium, a CHO must reformat the storage medium. A CHO should reformat the storage medium more than once before reusing or disposing the medium.
9. System Monitoring. A CHO must use appropriate methods to monitor security systems. Systems that have access to any HMIS data must maintain a user access log. Many new operating systems and web servers are equipped with access logs and some allow the computer to email the log information to a designated user, usually a system administrator. Logs must be checked routinely.

Application Security

1. Applicability. A CHO must apply application security provisions to the software during data entry, storage, and review or any other processing function.
2. User Authentication. A CHO must secure all electronic HMIS data with, at a minimum, a user authentication system consisting of a username and a password. Passwords must be at least eight characters long and meet reasonable industry standard requirements. These requirements include, but are not limited to:
 - a. Using at least one number and one letter or symbol;
 - b. Not using, or including, the username, the HMIS name, or the HMIS vendor's name; and
 - c. Not consisting entirely of any word found in the common dictionary or any of the above spelled backwards.

Written information specifically pertaining to user access, e.g., username and password, may not be stored or displayed in any publicly accessible location.

Individual users should not be able to log on to more than one workstation at a time or be able to log on to the network at more than one location at a time.

3. Electronic Data Transmission. A CHO must encrypt all HMIS data that are electronically transmitted over the Internet, publicly accessible networks, or phone lines to current industry standards. The current standard is 128-bit encryption. Unencrypted data may be transmitted over secure direct connections between two systems. A secure direct connection is one that can only be accessed by users who have been authenticated on at least one of the systems involved and does not utilize any tertiary systems to transmit the data. A secure network would have secure direct connections.
4. Electronic Data Storage. A CHO must store all HMIS data in a binary, not text, format. A CHO that uses one of several common applications, e.g., Microsoft Access, Microsoft SQL Server, or Oracle, are already storing data in binary format and no other steps need to be taken.

Hard Copy Security

1. Applicability. A CHO must secure any paper or other hard copy containing PII that is either generated by or for HMIS, including, but not limited to reports, data entry forms, and case / consumer notes. Hard copies should be stored in a locked and secure file cabinet in an area not accessible to non-CHO staff.

2. Security. A CHO must, always, supervise any paper or other hard copy generated by or for HMIS that contains PII when the hard copy is in a public area. When CHO staff are not present, the information must be secured in areas that are not publicly accessible. Written information specifically pertaining to user access, e.g., username and password, must not be stored or displayed in any publicly accessible location.

DRAFT

APPENDIX G: CONSENT TO DATA SHARING FOR RUNAWAY AND HOMELESS YOUTH



Watsonville/Santa Cruz City & County Continuum of Care (CoC) Consent for Data Sharing for Runaway and Homeless Youth (RHY)- Funded Programs

The Santa Cruz County Homeless Management Information System (HMIS) is a shared database and software application which confidentially shares consumer-level information related to homelessness in Santa Cruz County. We ask you to consent to the sharing of your information to help the Watsonville/Santa Cruz City & County Continuum of Care (CoC) provide quality housing and services to people at risk of or experiencing homelessness and/or who have very low-income.

Your information will be released to housing and services providers ("Covered Homeless Organizations (CHOs)"), which include community-based organizations and government agencies. CHOs use the information in HMIS to: improve the quality of housing and services; identify patterns and monitor trends over time; conduct needs assessments and prioritize services for subpopulations at risk of or experiencing homelessness or with very low-income; enhance inter-agency coordination; and monitor and report on the delivery, impact, and quality of housing and services.

BY CHECKING AND SIGNING THIS FORM, I UNDERSTAND THE FOLLOWING:

- I understand the following on the sharing of my basic information with CHOs:
 - CHOs may change over time; a current list of CHOs has been provided to me and I may request an updated list at any time or view the list at <https://santacruz.bitfocus.com/participating-agencies>.
 - Basic information includes: Name, Social Security Number, Date of Birth, Race, Ethnicity, and Gender.
 - The collection, use, and release of this information is for the purpose of assessing my needs for housing, counseling, food, utility assistance, or other services.
- I understand that the information shared may include the following types of protected personal information (PPI):
 - Identifying information (e.g., name, birth date, gender, race, ethnicity, social security number, phone number, residence address, or other similar identifying information)
 - Medical, mental health and substance use information included in my responses to questions asked as part of the standard HMIS intake
 - Financial and benefits information (e.g., employment status, income verification, public assistance payments or allowances, food stamp allotments, health care coverage, or other similar financial or benefits information)
 - Housing status and related information
 - Information about services provided by Partner Agencies (e.g., intake date,

Consent for Data Sharing for RHY

duration, and type of service)

- I understand CHO's use the PPI collected in HMIS to assess, prioritize, and refer me to housing options and other services. I also understand that CHO's communicate with each other to coordinate prioritization, placement, and determine eligibility for housing and other services.
- I understand the CHO's and individual staff have signed agreements to maintain the security and confidentiality of my information.
- I understand that I may refuse to sign this Consent. My refusal will not affect my eligibility for benefits or services, or my ability to obtain services or receive support. My refusal does not disqualify me from receiving services or support.
- I understand that I may sign the Consent and still refuse to provide specific information that I do not want to share.
- I can revoke this Consent at any time, but I must do so in writing. Revoking the Consent is not retroactive and will not affect any information shared while I gave my consent. I understand that this consent is valid for 3 years from the date listed below.
- My PPI is protected by federal, state, and local regulations governing the confidentiality of consumer records. My information cannot be released without my written consent, except when the rules say otherwise.
- I have the right to review my records, to correct a record or file a statement of disagreement, and to be notified of the people who have reviewed my records, except in limited circumstances to protect the health and safety of myself or others.

SIGNATURE

Print Name of Consumer or Legal Guardian

Signature of Consumer or Legal Guardian

Date

APPENDIX H: DATA QUALITY AND IMPROVEMENT PROCESS AND PLAN



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Data Quality Defined

Data quality is a term that refers to the reliability and validity of consumer-level data in HMIS. It is measured by the extent to which data in the system represents authentic characteristics within a community. With good data quality, the Watsonville/Santa Cruz City & County Continuum of Care (CoC) can accurately provide a full picture of the individuals and families accessing local homelessness response system resources. HMIS data is used to: improve housing and services quality; identify patterns and monitor trends over time; conduct needs assessments and prioritize services for subpopulations experiencing or at-risk of homelessness or living with very low incomes; enhance inter-agency coordination; and monitor and report on the delivery, impact, and quality of housing and services.

Data Quality Standards

Data quality can be measured by data completeness, the extent to which all expected data elements are entered for all consumers; data timeliness, the amount of time that passes between data collection and entry into HMIS, and data accuracy, the extent to which data are entered accurately and consistently.

Data Completeness

Complete HMIS data is necessary to fully understand the demographic characteristics and service use of persons with information in HMIS and to identify ways to improve services. Complete data facilitates confident reporting and analysis of the experience of homelessness in the CoC region. Data is considered complete if ALL consumers are entered into HMIS and all required data elements are captured.

The CoC's goal is to collect 100% of all data elements; however, it recognizes that this may not be possible in all cases. HUD HMIS data standards expect no null (missing) data for required data elements, and "Don't Know" or "Refused" or "Other" responses should not exceed the percentages listed in the table below.¹

A missing rate of below 5 percent represents an ideal goal, and the CoC should work toward accomplishing this level of data completeness for all programs. For large-

¹ Programs serving those experiencing domestic violence will have much higher data incompleteness rates for name, social security number and date of birth. Programs serving persons who are not documented residents of this country will likely have higher rates of data incompleteness for social security numbers. These programs should focus on other areas of data quality.

scale night-by-night shelters, alternate targets for data completeness will be considered based on past performance.

Data Element	Applies to:	Don't Know/ Refused Should Not Exceed
First Name*	All Consumers	5%
Last Name*	All Consumers	5%
SSN*	All Consumers	5%
Date of Birth*	All Consumers	5%
Race	All Consumers	5%
Ethnicity	All Consumers	5%
Gender	All Consumers	5%
Veteran Status	Adults Only	5%
Disabling Condition	All Consumers	5%
Living Situation	Adults & Heads of Households (HoH)	5%
Zip Code of Last Permanent Address	All Consumers	5%
Income and Sources (at entry)	Adults & HoH	5%
Income and Sources (at annual update)	Adults & HoH enrolled in program 365 days or more	5%
Income and Sources (at exit)	Leavers - Adults & HoH	5%
Non-Cash Benefits (at entry)	Adults & HoH	5%
Non-Cash Benefits (at annual update)	Adults & HoH enrolled in program 365 days or more	5%

Data Element	Applies to:	Don't Know/ Refused Should Not Exceed
Non-Cash Benefits (at exit)	Leavers - Adults & <u>HoH</u>	5%
Physical Disability	All Consumers	5%
Developmental Disability	All Consumers	5%
Chronic Health Condition	All Consumers	5%
Mental Health	All Consumers	5%
Substance Abuse	All Consumers	5%
Domestic Violence	Adults & <u>HoH</u>	5%
Destination	Leavers - Adults & <u>HoH</u>	5%
Move-in Date	Adults & <u>HoH</u> enrolled in PH with move-in date	5%

*For anonymized consumers the following data elements will be exempted from the 95% completeness standard: (1) Social Security Number; (2) first name; (3) last name; (4) date of birth. However, all "canned" (pre-programmed) reports in Clarity Human Services software will still show those elements as "missing" for anonymized consumers.

Data Accuracy

Data should be entered accurately into HMIS. Accuracy depends on the consumer's ability to provide the data and staff's ability to document and accurately enter it. Although HMIS data accuracy can be hard to assess, providers should audit approximately 5% of active consumer records monthly. The audit should check that data recorded in the consumer file matches data recorded in HMIS (e.g., entry and exit dates, household type, demographic characteristics, history of homelessness, etc.) and that consumer data is in alignment with project characteristics (e.g., a family is not entered in a program for single adult men).

Data Consistency

Data consistency refers to all data entry staff understanding, collecting, and entering data consistently across all programs in HMIS. Data consistency requires data entry staff have a common understanding of each data element, its response categories, and meaning. To facilitate data consistency, Santa Cruz County H4H will ensure the availability of training procedures and materials that outline basic data elements, response categories, rationale, and definitions.

Data Timeliness

Entering data into HMIS in a timely manner is important for several reasons: it facilitates up-to-date information for resource availability, allows data to be accessible when needed (service planning for people experiencing homelessness, monitoring or funding purposes, or for responding to requests for information), and reduces human error that occurs when too much time elapses between the provision of a service (data collection) and data entry. Expectations regarding timely data entry are defined in the next table by project type. To ensure that system-wide data is as accurate as possible, all Universal Data Elements and Program-specific Data Elements should be entered according to the following timeliness standards.

Entry/Exit Data

Program Type	Data Timeliness Standard: At Entry	Data Timeliness Standard: At Exit
Emergency Shelter	Within two business days of intake	Night by Night: at or before 30 calendar days after the last service date. Exit date backdated to last service Entry/Exit: Within two business days of exit
Transitional Housing Permanent Supportive Housing Homelessness Prevention Services Only	Within two business days of intake	Within two business days of exit
Outreach	Within two business days of intake	At or before 30 calendar days after last service date.

Program Type	Data Timeliness Standard: At Entry	Data Timeliness Standard: At Exit
		Exit date backdated to last service
Day Shelter	Within two business days of intake	At or before 90 calendar days after last service date. Exit date backdated to last service

Service Data

All participating programs should enter services into HMIS within two workdays as described in the chart below

Program Type	Service Requirement
Night-by-night Emergency Shelters	Services to track bed nights and others as required by local funders
Street Outreach	Services required by local funders, where applicable
Day Shelters	Services required by local funders, where applicable
RHY-funded Programs	Additional data elements and services (see RHY HMIS Manual)
PATH-funded Programs	Additional data elements and services (see PATH HMIS Manual)

Current Living Situation Assessments

Current Living Situation assessments are used to document the housing status during the first interaction with each consumer, as well as any subsequent consumer interactions if the housing situation has changed. At a minimum, the Current Living Situation Assessment must be completed every 90 days even if there are no status changes.

Status Update Assessments

All consumers with an active/open HMIS enrollment that experience a significant status change in income, employment, non-cash benefits, living situation, or other key characteristics require an Update Assessment within 30 days of learning of the status change. All consumers with an active/open HMIS enrollment that experience a significant status change in income, employment, non-cash benefits, or other key characteristics require an Update Assessment within 30 days of learning of the status change. At a minimum, the Update Assessment must be completed every 90 days even if there are no status changes.

Annual Assessments

All HMIS enrollments that are active/open require an annual assessment within 30 days of participants' project start anniversary date each year (a 60-day window).

Continuous Data Quality Improvement Process

A continuous data quality monitoring and improvement process facilitates the ability of the CoC to achieve valid and reliable data. It sets expectations for both the community and end users to capture accurate data on persons accessing agency programs and services.

Roles & Responsibilities

Bitfocus, as the HMIS System Administrator, with input from Housing for Health (H4H), the HMIS lead, will provide the following services to assist agencies in correctly entering data into HMIS, and in addressing data quality issues:

- Work with Agency management to identify at least one agency employee as an HMIS agency lead.
- Provide end user trainings and workflow documents.
- Produce data quality reports and information on how to correct identified data quality issues.
- Work to identify and, in conjunction with agencies, resolve data quality issues that will impact local or federal reporting.
- Provide technical assistance to agencies requesting assistance in identifying steps to correct data quality issues.
- Provide other services as directed by the HMIS Lead, H4H.

Working with their HMIS lead, agencies will take primary responsibility for entering, verifying, and correcting data entry

- Agency staff will measure completeness by running recommended data quality reports and distributing those reports to staff tasked with improving data quality and completeness.
- It is the responsibility of Agency management to ensure staff tasked with correcting data quality issues do so in a timely manner.

Data Quality Review

At the CoC level, data are reviewed regularly, and issues are identified for follow up. Follow-up on system wide issues will include a discussion at the monthly HMIS Provider Meeting. Other agency-specific follow up will also be done by Bitfocus and H4H.

Monthly

Data quality dashboards, listing records with missing data or other data quality issues, are provided in the HMIS Data Analysis [Tab](#) or sent in scheduled emails monthly to assist agencies in identifying data errors. Staff reports are emailed monthly to all agency leads to assist in monitoring agency staff usage of the system.

Quarterly

On a quarterly basis, Bitfocus will review staff HMIS utilization and data quality statistics and inform agencies of compliance issues.

Reporting Preparation

Approximately two months before any significant local or federal reporting deadlines, data impacting the reports are thoroughly reviewed by Bitfocus, with agency follow up and technical assistance as needed.

Participating agencies should run data quality reports (HUDX-225, described below) monthly. In the weeks prior to submitting a report ([e.g.](#) APR), data quality reports may need to be run on a daily basis to ensure that any issues identified by the agency or Bitfocus are being addressed.

Agencies that review data regularly are likely to have higher levels of data quality in general and are usually not correcting significant data issues during the timeframe of federal reporting deadlines.

Minimizing Data Quality Issues

How to minimize data quality issues:

- Enter consumer data as soon as possible. The more time that passes between collecting data and entering the data into HMIS, the greater the odds that there will be data quality issues (see section above for data timeliness standards).
- Whenever possible, enter data during consumer visits so that consumers may help identify potential inaccuracies.
- Review Data Quality once a month and address any issues as soon as possible.
- Problem-solve with Program and HMIS staff around any ongoing issues.

Support for Agencies and HMIS Users

To ensure that agencies and HMIS users have the tools necessary to address data quality issues efficiently, H4H and Bitfocus provide a range of support resources.

Recommended Reports for Data Review

HMIS includes an extensive library of reports. The following reports are recommended as a starting place for reviewing data and identifying data quality issues:

- **[GNRL-16] Program Roster** (Program Based Reports) is used to check individuals enrolled in a program during a particular reporting period. Summarizes data entered for each client, entry and exit dates, and assigned staff. Best to check monthly to confirm high level data on people being served during a reporting period accurately reflects the work done by the program.
- **[HUDX-225] HMIS Data Quality Report [FY 2022]** (HUD Reports) includes program or agency level data that highlights key HUD data quality issues. When run as a web output report allows for getting more detail on the source of errors. Recommend checking this at least every quarter.
- **[DQXX-102] Program Data Review** (Data Quality Reports) includes program and client specific data quality issues and the ability to drill into specific clients with errors if web output format is used. Recommend checking this every quarter.
- **Data Analysis Report - Santa Cruz Clarity System Reports - Quarterly Status Update Report.** Report only available to HMIS manager level users. Contains information at agency and program level of clients due for quarterly status, living situation, or annual updates.

Technical Assistance

When agencies either need assistance identifying data quality issues or have identified issues and are unsure how to proceed, there are several avenues of technical assistance available. The Watsonville/Santa Cruz CoC HMIS Helpdesk can provide initial troubleshooting assistance and escalate issues to the Watsonville/Santa Cruz CoC HMIS System Administration team as needed. The System Administration team may proactively reach out to agencies directly or at the request of funders, H4H, or the agency itself to identify and address data quality issues. Additionally, the System Administration team offers guides, trainings, dashboards, and other resources to help agencies proactively identify and resolve data quality issues on their own.

Key Reports and Processes that Rely on Data Quality

Data quality is essential to several reports and processes that are produced for individual program reporting to funders as well as CoC-level information for system improvement. Data quality issues such as high rates of missing consumer data, missing or inaccurate enrollment, annual assessment and exit data can impact program and CoC funding. Data quality issues prevent H4H from producing accurate reports for funders, elected officials, and other constituents. The Continuous Data Quality Improvement Process described above supports accurate HMIS information for these reports and processes, including but not limited to:

Annual Performance Review (APR) - Program

Recipients of HUD funding through the homeless CoC grant competition are required to submit an Annual Performance Report (APR) electronically to HUD via Sage (formerly ~~e-snaps~~) every operating year.

Coordinated Entry APR

The Coordinated Entry (CE) program is required to submit a special CE Annual Performance Report (APR) electronically to HUD, via Sage every operating year. The CE APR includes data from the HMIS as well as narrative responses.

HMIS APR

In Watsonville/Santa Cruz CoC HMIS is a recipient of HUD funding through the homeless grant competition; consequently, H4H is required to submit a special HMIS Annual Performance Report (APR) electronically to HUD, via Sage every operating year. The HMIS APR includes data from the HMIS as well as narrative responses.

Annual CoC Competition Application to HUD

The CoC competes in an annual national competition for HUD CoC Program funds. System-wide data is required as part of that application, as is aggregate data for all projects receiving CoC funding.

Point in Time Count (PIT)

The Point-in-Time (PIT) count is an enumeration of sheltered and unsheltered homeless persons typically on a single night in January. HUD requires that the sheltered portion of the county be generated from HMIS data. The sheltered portion consists of consumers sheltered in emergency shelter and transitional housing on this single night.

Approximate due date: April 30

Housing Inventory Count (HIC)

The Housing Inventory Count (HIC) is a comprehensive inventory of all housing dedicated to serving homeless and formerly homeless individuals and families within a CoC. All beds/units/bed vouchers should be included.

Approximate due date: April 30

System Performance Measures (SysPM)

HUD System Performance Measures are a tool used to measure the local homeless response as a coordinated system rather than individual programs and funding sources. HUD uses the system-level performance information as a competitive element in its annual CoC Program Competition and to gauge the state of the homeless response system nationally.

Approximate due date: Feb/March

Longitudinal Systems Analysis Report (LSA)

A major purpose of the Longitudinal Systems Analysis Report (LSA) is to produce the Annual Homeless Assessment Report (AHAR), a HUD report to the U.S. Congress that provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The LSA data provided by CoCs contains community-level information on people and households served by continuum projects over the course of one year. The

LSA data is submitted in the form of CSV files uploaded to HUD's Homeless Data Exchange.

Stella is a strategy and analysis tool that helps CoCs understand how their system is performing and models an optimized system that fully addresses homelessness in their area. This tool can be useful in evaluation and planning a homeless assistance system only to the extent that LSA data is complete and accurate.

Approximate draft due date: Oct 31

Approximate final due date: Dec 31

In preparation for each of these processes, agencies and Bitfocus employ the continuous data quality improvement practices described above. Specifically:

- Throughout the year:
 - Bitfocus: conduct data quality reviews based on feedback from H4H staff and from agencies, following up with agencies as needed.
 - Bitfocus: provide Agencies regularly with dashboards and other information about specific data quality issues that need to be addressed.
 - Bitfocus: provide trainings on data quality topics.
 - Agencies: follow up on data issues as identified by Bitfocus and/or H4H staff.
 - Agencies: ensure staff understand issues related to data quality through ongoing training and support.
- As a report deadline approaches:
 - Agencies: begin data quality review well in advance, focused on ensuring the correct number of consumers are enrolled and there are no null values. Make corrections as needed. For example, ensure that no required information, such as veteran status, is missing.
 - Bitfocus: help agencies with data quality issues upon request.

APPENDIX I: USER AGREEMENT AND CODE OF ETHICS



Watsonville/Santa Cruz City & County Continuum of Care (CoC) Individual HMIS User Agreement and Code of Ethics

The primary focus in the design and management of the Watsonville/Santa Cruz CoC HMIS is to help consumers get and keep permanent homes. Achievement of this goal requires continual quality improvement of programs and services and the maintenance of consumer confidentiality by treating personal data with respect and care.

As the guardians entrusted with this personally identifiable information (PII), Watsonville/Santa Cruz CoC HMIS users have a moral and legal obligation to ensure that appropriate methods are practiced with the collection, access, and utilization of data. Each user must ensure that consumer data is only used for the purpose for which it is collected. Proper user training, adherence to the Watsonville/Santa Cruz City & County CoC Privacy Policy, and a clear understanding of consumer confidentiality are vital to achieving these goals. All Users are required to attend a CoC approved training class prior to their first use of the HMIS and annually thereafter.

Please check each box below to indicate your understanding and acceptance of the proper use of the HMIS system and data. PLEASE READ CAREFULLY. Failure to uphold the confidentiality standards set forth below is grounds for immediate termination from HMIS access and may result in disciplinary action from the CHO as defined in the CHO's personnel policies.

BY CHECKING EACH BOX AND SIGNING THIS FORM, I UNDERSTAND THE FOLLOWING:

I agree to maintain the confidentiality of Consumer information in the HMIS in the following manner:

- My user ID and password are for my use only and must not be shared with anyone.
- I must take all reasonable means to keep my password physically secure.
- I understand that the only individuals who can view information in HMIS are authorized users and the consumers to whom the information pertains.
- I may only view, obtain, disclose, or use the database information that is necessary to perform the official duties of my job.
- I acknowledge that it is a consumer's decision about which information to share for entry into HMIS and the data will only be shared with authorized HMIS partner agencies.
- I will ensure that an HMIS Consumer Notice is posted at any location consumer intake services are provided and personally identifiable information (PII) is entered into HMIS.
- I will always provide consumers with a copy of the CoC Consumer Notice and an Acknowledgement of its receipt shall be signed at least every three years. A copy of the signed Acknowledgement will be uploaded and stored in the HMIS system.

HMIS User Agreement and Code of Ethics

- If I have a conflict of interest in entering data within HMIS, I will disclose that to my supervisor. If I am a consumer with information in the Watsonville/Santa Cruz CoC HMIS, or if I have immediate family members with information in the Watsonville/Santa Cruz CoC HMIS, I will not make changes to those files.

To prevent casual observers from seeing or hearing HMIS Consumer information:

- If I am logged into HMIS and must leave the work area where the computer is located, I must log off HMIS before leaving the work area. Failure to log off HMIS may result in a breach of consumer confidentiality and system security.
- Hard copies of HMIS information must be kept in a secure file. When hard copies of HMIS information are no longer needed, they must be properly destroyed to maintain confidentiality.
- I will not discuss HMIS confidential Consumer information with staff, Consumers, or Consumer family members in a public area.
- I will not discuss HMIS confidential Consumer information on the telephone in any areas where the public might overhear my conversation.
- I will not transmit confidential consumer or identifying information via unsecured and unencrypted email.
- I will not leave messages on my agency's answering machine or voicemail system that contains HMIS confidential Consumer information.
- If I notice or suspect a security breach, I must immediately notify my Agency Administrator and Bitfocus.

As an HMIS User, I understand and will abide by the following Code of Ethics:

- Users must be prepared to answer Consumer questions regarding HMIS.
- Users must faithfully respect Consumer preferences about the sharing of their information within the HMIS.
- Users must accurately record Consumer's preferences by making the proper designations as to sharing of Consumer information and/or any restrictions on the sharing of Consumer information.
- Users must not refuse services to a Consumer, or potential Consumer, if that Consumer refuses to allow sharing personal information with other agencies via the HMIS.
- The User has primary responsibility for information entered by the User. Information that Users enter must be truthful, accurate and complete to the best of User's knowledge.
- Users will not solicit from, or enter information about, Consumers into the HMIS unless the information is required for a legitimate business purpose, such as providing services to the Consumer, and/or is required by the program funder.
- Users will not use the HMIS database for violation of any law, to defraud any entity or to conduct any illegal activity.

HMIS User Agreement and Code of Ethics

- Upon Consumer written request, Users must allow a Consumer to inspect and obtain a copy of the Consumer's own information kept within the HMIS, unless sharing this information could result in significant harm to the health and safety of the consumer or others.
- Information compiled in reasonable anticipation of, or for use in, a civil, criminal, or administrative action or proceeding need not be provided to the Consumer.
- Users must permit Consumers to file a written complaint regarding the use or treatment of their personal information within the HMIS. Consumers may complete an HMIS Data Misuse and Breach Reporting form located at santacruz@bitfocus.com. Consumer will not be retaliated against for filing a complaint.

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

_____	_____ _____	_____
Print Name	Signature	Date
_____	_____	_____
Agency Name	Work Phone Number	Email Address

APPENDIX J: HMIS DATA MISUSE AND BREACH REPORTING FORM



Watsonville/Santa Cruz City & County Continuum of Care (CoC)

HMIS Data Misuse and Breach Incident Reporting Form

This form is used to notify the Watsonville/Santa Cruz City & County CoC of any of the following in relation to its Homeless Management Information System (HMIS) and the use of data from HMIS:

- An incident involving unsecured Personally Identifiable Information (PII), if that PII was, or is reasonably believed to have been accessed or acquired by an unauthorized person; or
- A suspected security incident, intrusion, or unauthorized access, use, or disclosure of PII in violation of signed agreements

PII is any information about an individual which can be used to distinguish, trace, or identify their identity, including personal information like name, address, date of birth or social security number.

Please complete as much of this form as possible. Depending on the specific nature of the incident, Bitfocus (the HMIS Administrator) or a Housing for Health (H4H) Division staff member (the HMIS Lead) will contact you.

Person Reporting the Incident

First Name	Last Name
Phone Number (include area code)	Email
Agency	Title (if applicable)

Incident Details

Organization:
Organization Street Address:
Organization City and Zip:
Date and time of incident:
Date and time you learned of the incident:

UPDATED JUNE 2022



Type of Incident (Check all that apply)

- Unauthorized Access
- Unauthorized Disclosure
- Loss
- Theft
- Other (describe)

Location of Incident (Check all that apply)

- Desktop computer
- Laptop computer
- Other electronic device
- Paper
- Other (describe)

Brief Description of Incident (specific data accessed, used, or disclosed in ways that constitute a breach, specific consumer(s) involved):

IF YOU ARE A CONSUMER REPORTING AN INCIDENT, YOU DO NOT NEED TO COMPLETE THE REST OF THIS FORM.

Estimated # of client data records breached:

Safeguards in Place Prior to Incident (Check all that apply)

- None
- Privacy safeguards (Training, Policies and Procedures, etc.)
- Security administrative safeguards (Risk Analysis, Risk Management, etc.)
- Security physical safeguards (Facility Access Controls, Workstation Security, etc.)
- Security technical safeguards (Access Controls, Transmission Security, etc.)

UPDATED JUNE 2022



Actions Taken in Response to Incident (Check all that apply)

- Adopted encryption technologies
- Changed password/strengthened password requirements
- Created a new/updated Security Risk Management Plan
- Implemented new technical safeguards
- Implemented periodic technical and nontechnical evaluations
- Improved physical security
- Performed a new/updated Security Risk Analysis
- Provided individuals with free credit monitoring
- Revised policies and procedures
- Sanctioned workforce members involved (including termination)
- Took steps to mitigate harm
- Trained or retrained workforce members
- Other (describe)

UPDATED JUNE 2022

APPENDIX K: APPROACHES TO RESPONDING TO CONSUMER CONCERNS ABOUT DATA SHARING



Watsonville/Santa Cruz City & County Continuum of Care (CoC)

Approaches to Responding to Consumer Concerns about Data Sharing

- Explain importance of data sharing
 - Helps streamline the application and intake process, especially if consumer is working with other providers who use HMIS
 - Important documents can be saved into electronic [file](#) so the same information doesn't have to be collected again
 - Helps to not miss out on housing opportunities –we can notify you of temporary and permanent housing opportunities
 - HMIS allows linking people to valuable resources by matching information with the eligibility criteria for resources such as benefits linkage, rental assistance, shelters, street outreach, housing navigation, veteran services, health services, and runaway homeless youth services.
- Explain privacy and security; everyone gets retrained every year
- Explain de-identified/aggregate data is reported and used
 - Provides statistical and demographic information necessary to continue receiving funding for services and housing for people experiencing homelessness
 - Helps us understand the needs of our community to identify gaps and services that would benefit our community further
 - Helps us identify and make the case for more housing, more services, and more funding for the community
- Role play with a colleague
- Options if client doesn't want some/all data shared
 - Only enter data client is willing to share
 - Create an anonymous client record

Updated June 2022

APPENDIX L: HMIS AGENCY CORRECTIVE ACTION PLAN TEMPLATE



**Watsonville/Santa Cruz City & County Continuum of Care (CoC)
HMIS Agency Corrective Action Plan**

Date of Notification: _____

Agency: _____

Executive Director/HMIS Lead for Agency: _____

Email: _____ Phone: _____

<u>Itemized Violation(s)</u>	<u>Applicable Documents</u>
1.	
2.	
3.	
4.	



<u>Itemized Corrective Measures</u>	<u>Expected Completion Date</u>
1.	
2.	
3.	
4.	

HMIS Resources to Support Corrective Measures:

Agency Administrator/Director Signature

Date

CoC HMIS Coordinator Signature

Date

APPENDIX M: HMIS GRIEVANCE FORM



**Watsonville/Santa Cruz City & County Continuum of Care (CoC)
HMIS Grievance Form**

How to File a GRIEVANCE about our Privacy Practices

If you feel a violation of your rights as an HMIS client has occurred or disagree with a decision made about your "Protected HMIS Information" you may complete this form. Complete this form only after you have exhausted the grievance procedures at your agency. **It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.**

Grievances must be submitted in writing to:

Housing for Health Partnership HMIS
County of Santa Cruz Human Services Housing for Health Division
1000 Emeline Ave., Santa Cruz, CA 95060

Date of offense: _____

Name of individual who
Violated your privacy rights.

Name of Agency who
Violated your privacy rights.

Brief description of grievance - what happened:

Best way to contact you: _____

Your name: _____

Your phone: _____

Your mailing address: _____

We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services, and to better understand the needs of people served. We only collect information that we consider to be appropriate.



CoC Grievance Response Date: _____

Recommendation to Agency:

DRAFT

Action Item 5: Adoption of Low-Barrier Navigation Center Standards

(Action required) – Monica Lippi/CoC Operations Committee

Recommendation

Adopt the low-barrier navigation center standards developed by the CoC operations committee to meet HUD CoC expectations related to the adoption of standards for shelter operations.

Background

HUD requires the CoC Boards prepare, adopt, and update written standards related to the operations of key components of their local system of housing and supportive services. In November 2021, Housing for Health Division (H4H) staff met with a group of shelter providers involved in a COVID-19 shelter provider workgroup to discuss the benefits of creating updated shelter operational standards. Representatives from the following agencies were present Housing Matters, Association of Faith Communities (AFC), Salvation Army (both North and South County), Monarch Services, County-operated COVID-19 Isolation/Quarantine/Vulnerable (IQV) Shelters, Pajaro Valley Shelter Services (PVSS), and Siena House. The group provided initial input related to the development of standards.

H4H staff started drafting Emergency Shelter standards through a community process that included surveying the practices of existing county funded shelters and reviewing standards from other communities and other public funding standards. H4H presented initial draft standards to the shelter workgroup in February 2022 and gathered feedback. The group discussed at length the standards related to permanent housing exit planning and on a proposed six-month cap on lengths of stay.

H4H incorporated the shelter workgroup's feedback and drafted another version that was presented to the H4H Partnership Operations Committee in August. Committee members requested the addition of further details and definitions to various standards throughout the document. The document was re-titled Low Barrier Navigation Center Standards in September 2022. Since the standards had evolved over time, the new title reflects more service enriched supportive environments focused on positive housing exits, rather than simply emergency shelters.

H4H incorporated Operations Committee's feedback and presented another draft to the group in September. Minor changes were requested and made. The group approved implementation recommendation to the H4H Partnership Policy Board. The proposed standards would be reviewed and updated

Suggested Motion

I move to adopt the Operations Committee proposed low-barrier navigation center standards and to request that H4H staff work to ensure a minimum annual review and update to the standards.

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Preface

These Navigation Center Standards, adopted by Santa Cruz County’s Continuum of Care - Housing for Health Partnership on Oct. 19, 2022, were developed based on the guiding principles of inclusion, dignity, accessibility, self-determination, and mutual accountability. They are intended to ensure a consistent quality of care across all County funded navigation centers and to operationalize the County’s commitment to providing low barrier, housing first, and shelter supportive services to those without homes in our community. The standards were developed through a community process that included surveying the practices of existing county funded shelters, reviewing standards from other communities and other public funding standards, such as those required by the federal Emergency Solutions Grants (ESG) program and the Federal Emergency Management Agency (FEMA).

Most county funded navigation centers already meet many of these standards, and it is understood that compliance will increase over time. Technical assistance and training will help shelters to meet the standards over the course of the next several years.

To request a waiver of any standards outlined in this document, contact Santa Cruz County’s Human Services Department’s H4H Division at HousingForHealth@santacruzcounty.us.

Navigation Center vs. Emergency Shelter

HUD defines emergency shelter as “housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person.” See also Gov. Code, § 65582, subd. (d) and Health and Safety Code, § 50801, subd. (e).

California Gov. Code § 65660 describes Low Barrier Navigation Centers as “Housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, health services, shelter and housing.”

The terms “shelter” and “navigation center” are used interchangeably throughout this document, however, the term “shelter” should not be confused with “emergency shelter.” These standards are specific to low-barrier navigation centers that provide service enriched shelter.

The Housing for Health Partnership is committed to support low-barrier navigation centers and shelters that are funded by the County are expected to meet the operating standards outlined in this document.

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Housing for a Health Santa Cruz

The County and its partners created the Housing for a Healthy Santa Cruz County Strategic “Framework” through a collaborative process that used the experience, knowledge and input of a broad set of community stakeholders including cities, non-profit organizations, County Departments, and people with lived experiences of homelessness. The Framework’s Core Goal #1 is to improve the effectiveness of all programs in helping people secure housing. Included in this goal, the following shelter performance measurement improvements are aimed to be achieved by end of 2023.

Measure	Emergency Shelter	
	FROM	TO
Reduce Length of Stay (in days)	76	60
Increase Rehousing Rate	21%	40%

Referral, Admission and Access Procedures

Coordinated Entry System Protocols

These standards will shift for all navigation center providers with the introduction of a newly designed countywide coordinated entry system (CES – currently known as Smart Path). Once a new coordinated entry system is operationalized, the navigation center must adhere to the referral and admission protocols developed for the CES.

Admission

All navigation centers must have clearly written and consistently implemented referral standards, admission policies, and hours for new guest admission. All navigation centers must accept new guest admissions (when shelter is open and beds are available) Monday through Friday for at least a four-hour period daily. Where feasible, admissions should be accepted on weekends.

Admissions protocols will be established through the coordinated entry mechanism. Additional standard information will be included when the CES redesign work is operationalized.

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Denial of Admission

Denial of admission to the facility is at the discretion of the navigation center and can only be based on the reasons outlined below if evidence is available to support a denial for the given reason. Denial reasons must be documented in HMIS. Additional standard information will be included when the CES redesign work is operationalized.

- Client does not meet the basic eligibility criteria for navigation center admission (e.g., gender, age, homeless status, domestic violence victim, etc.). Navigation centers with beds designated by funding sources as having additional restrictions (e.g., VA beds that require advance approval by the VA) may deny entry to those not meeting funder requirements.
- Client has a criminal record involving sex offenses, arson or violent crime that poses a current risk to the health and safety of staff and/or guests. When considering a guest's criminal record, navigation centers must include an assessment of the length of time since the crime occurred and efforts made towards rehabilitation in the evaluation of eligibility for entrance. This standard does not require that navigation centers assess criminal history.
- A restraining order that prohibits admission to the facility.
- Violent or threatening behavior.
- Conduct from prior stay at the navigation center that puts the health and safety of staff or guests at risk (e.g., violence, weapons violations, disclosing confidential location of shelter, and egregious damage to property). Navigation centers will not implement permanent bans based on prior shelter behavior. When considering denial of admission based on prior behavior, shelters must include an assessment of the length of time since the participant's former stay and the potential for behavior or situational change. If a client is denied entrance based on a prior stay the client must be informed of the reason, conditions for lifting the restriction and right to appeal, including whom to contact regarding an appeal and information about the appeal process. Additional requirements for communication regarding grievance and appeals procedures at the point of discharge are included in the [Grievance](#) standard.
- Infectious disease that significantly increases the risk of harm to other guests. Note that guests with lice or scabies or exhibiting symptoms of TB should be allowed to stay in shelter and sent to a health care provider for treatment as soon as possible. Precautions should be taken to avoid spread as feasible. For additional guidance on this regulation, please also refer to "Preventing Tuberculosis (TB) in Homeless Shelters" published by the Los Angeles County Department of Public Health: <http://publichealth.lacounty.gov/tb/docs/LATBGuidelinesforShelters.pdf>. Noncompliance with treatment or containment measures that endangers other guests may be cause for discharge.
- The individual requires care and supervision to manage the activities of daily living (feeding, toileting, selecting proper attire, grooming, maintaining continence, putting on clothes, bathing, walking and transferring) without the appropriate supports available on-site (e.g., an inappropriate request for admission as a discharge location from a hospital).

Accessibility

All navigation centers must conform to all pertinent requirements of the Americans with Disabilities Act (ADA). See <https://www.ada.gov/pcatoolkit/chap7shelterchk.htm>.

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Beds designated as accessible must comply with federal height and distance standards requiring a minimum of 36 inches¹ between sleeping units and a sleeping surface height between 17-19 inches above the finished floor. Beds designated as accessible must be prioritized for guests with disabilities. Navigation centers are encouraged to provide as many ADA accessible beds as possible, but it is not required or expected that all beds meet these requirements.

Program documentation must be provided in forms accessible to hearing-impaired and sight-impaired individuals, upon request. Navigation centers that provide transportation for guests must also make provisions for guests who need vehicles that are wheelchair accessible.

Non-discrimination/reasonable accommodation

All navigation centers must have policies on non-discrimination and reasonable accommodation and make reasonable modifications in programs, activities and services when necessary to ensure equal access to individuals with disabilities, unless fundamental alteration in the nature of the program would result from the accommodation.

Transgender Access

All navigation centers must comply with the HUD Rule on Appropriate Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities.

See link: [Transgender Placements](#)².

Language Accessibility

Staff must ensure that guests have access to interpreter services and that written materials are available in Medi-Cal threshold languages (in Santa Cruz County this is only Spanish).

Navigation center Operations

Intake

Upon admissions, guests must be provided with copies of the following:

- Guest rights (see [Guest Rights](#) standard)

¹ This spacing requirement pre-dates COVID-19. For bed spacing guidance during the COVID-19 pandemic, please refer to Congregate Shelter COVID-19 Policies and Recommendations document (<https://housingforhealthpartnership.org/ForProviders/ShelterGuidance.aspx>)

² <https://www.hud.gov/sites/documents/15-02CPDN.pdf>. Requires that providers that place eligible persons in single-sex emergency shelters should place based on the gender with which the person identifies, taking health and safety concerns into consideration. A client's own views with respect to personal health and safety should be given serious consideration in making the placement. A provider will not make an assignment or re-assignment based on complaints of another person when the sole stated basis of the complaint is a client's or potential client's non-conformance with gender stereotypes. There generally is no legitimate reason for the provider to request documentation of a person's sex in order to determine appropriate placement, nor should the provider have any basis to deny access to a single-sex emergency shelter solely because the provider possesses identity documents indicating a sex different than the gender with which the client identifies. The provider may not ask questions or otherwise seek information or documentation concerning the person's anatomy or medical history. Nor may the provider consider the client ineligible for an emergency shelter or other facility because his or her appearance or behavior does not conform to gender stereotypes.

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- Written program rules (see [Guidelines/Rules](#) standards)
- Visitation policy (see [Visitors](#) standard)
- Storage policy, including storage after exit (see [Storage](#) standards)
- Medication storage policy (see [Medication](#) standard)
- Grievance Procedure (see Visitor’s standard)

Guest Emergency Information

Shelter staff must collect emergency contact information and information about health needs upon admission that may impact an emergency response. Such information should be kept in a place accessible to on-duty staff in the event of an emergency.

Guidelines (aka Rules)

Hours/Sleeping Hours/Curfew

All navigation centers must post hours of operation in a visible location. Guests must be allowed access to their possessions and to the facility common space at all times. If access to sleeping areas is not available during the day, accommodations should be made to allow access for those working second and third shifts, those who are ill, etc.

Navigation centers should remain open 24/7 unless prohibited by inadequate funding or space limitations. As feasible, shelters not open 24/7 must make reasonable accommodations to normal hours for illness, weather, disabilities, persons working second and third shifts, and other reasonable requests. Navigation centers that serve children must permit 24-hour access to an area where children can nap.

All shelters must provide facilities available to guests for sleeping for a minimum of eight (8) hours.

If a navigation center has a curfew policy, the policy must be clearly written and explained to guests at shelter entry. The policy must be consistently enforced. Missing a curfew cannot be a reason for denial of entry or discharge unless the late arrival compromises the health or safety of other guests or staff or if the guest’s late arrival repeatedly interferes with the rights of other guests to peaceful enjoyment of the facility.

Some navigation centers maintain a curfew policy to ensure the safety of participants. In some cases, navigation centers may have a policy that includes filing a missing person report if a participant does not return by the curfew time. This should be clearly explained to guests at the time of shelter entry.

Drug and alcohol use/possession

Navigation centers must have a policy prohibiting the possession, use or distribution of alcohol or illegal drugs on the premises. If alcohol or drugs are found, guests should be given the opportunity to dispose of the prohibited substance or leave the shelter for that night if they do not wish to dispose of the prohibited substance. A violation of this policy cannot be a reason for discharge unless the violation compromises the health or safety of other guests or staff or repeatedly interferes with the rights of other guests to peaceful enjoyment of the facility.

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Admission, discharge, and service restriction policies must not be based on substance use or possession alone, unless the program is designated as an abstinence-based program in its funding contract.

Drug testing of guests is prohibited unless the testing is part of an agreed upon treatment plan with the guest. Submission to drug testing cannot be a requirement for residency and refusal to participate in drug testing cannot be the basis for involuntary discharge.

Being under the influence on-site may not be the basis for discharge. Discharge must be based on specific behaviors that meet the standard for discharge as described in the [Discharge Reasons](#) standard.

Weapons

All navigation centers must have a written weapons prohibition policy. Weapons include but are not limited to firearms, pepper spray, mace, and knives. Shelters should use discretion when determining which types of knives should be prohibited. Shelters may, but are not required to, have a mechanism for checking weapons upon entry.

Smoking

Navigation centers shall prohibit smoking indoors and reasonable efforts must be made to prevent smoke from entering buildings. No smoking should be allowed within 20 feet of shelter facilities unless this is infeasible due to layout of grounds. Shelters are required to follow any local ordinances regarding smoking in public areas.

It is recommended that information about tobacco cessation resources be posted.

Visitors

Navigation centers must have and post a visitation policy. The visitation policy should also be provided in writing to each guest upon entry into the shelter. Each shelter should determine the visitation policy for their program; however, each shelter's visitation policy must include that service providers from other programs or agencies will be accommodated to meet with a guest.

Participant Rights and Responsibilities

Participant Rights

Participant rights must be provided in writing and posted in the facility. All program requirements must be consistent with these standards. Rights must include:

- Guests have the right to be treated with dignity and respect.
- Guests have the right to privacy within the constrictions of the shelter environment.
- Guests have the right to be treated with cultural sensitivity.
- Guests have the right to self-determination in identifying and setting goals.
- Services should be provided to guests only in the context of a professional relationship based on valid, informed consent.
- Guests should be clearly informed, in understandable language, about the purpose of the services being delivered, including guests who are not literate and/or have limited-English proficiency.

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- Guests have the right to confidentiality and information about when confidential information will be disclosed, to whom and for what purpose, as well as the right to deny disclosure, unless disclosure is required by law.
- Guests have the right to reasonable access to records concerning their involvement in the program.

Participant Responsibilities

Participant responsibilities must be provided to each guest in writing upon admission and posted in the facility in a visible location. This must include:

- A clear description of all program rules and potential consequences for violations of these rules.
- A “good neighbor” policy that outlines expected behavior in order to not interfere with the rights of other guests including the use of scented products when guests with chemical sensitivities are in residence.
- Any expectations related to chores.
- Expectations regarding working to exit shelter into stable housing as quickly as possible.

On-Site Expectations

Written program rules must specify any chores and/or housekeeping requirements of guests and must be provided to participants upon entry or posted in a location easily visible by guests. Chore policies should allow for accommodations for those who cannot participate in chores due to disability, pregnancy, etc.

Noncompliance with a chore policy cannot be a reason for discharge unless a repeated pattern of violation occurs that impacts other guests.

Actively Engaged in Exit Planning

After an initial grace period at entry allowing shelter guests time to adjust to their new setting, participants have an obligation to be engaged in a housing plan and shelters may discharge a guest who refuses to work towards a housing plan and/or has refused multiple housing opportunities. Before discharge for this reason, evidence must be present that the shelter staff actively attempted to engage the participant in housing support designed to assist shelter exit to stable housing with consideration given to each guest's barriers to engagement.

As a system, we will work towards providing training for program staff on developing housing plans and motivating guests towards successful exits to permanent housing. The intent of this standard is for each person or household's shelter stay to be focused on exiting to permanent housing.

Length of Stay

Navigation centers are not long-term solutions. Stays should be considered brief stops on a participant's pathway to housing. As part of the Housing for a Healthy Santa Cruz County Strategic Framework, the County and its partners adopted a goal to reduce shelter stays to sixty days.

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Navigation centers should work with participants toward achieving this goal through the development of permanent housing plans.

Subdivision (e) of the California Health and Safety Code §50801 limits shelter occupancy to six months or less. Shelters will follow this state regulation to ensure lengths of stay are no more than six months and beds are made available for others in need.

Exceptions to this rule may be made when participants are actively engaged to find housing. Shelter staff should consider that “active engagement” may be interpreted differently depending on the individual guest. Assistance and expectations should be tailored to each individual or household’s needs, strengths, and barriers. At minimum, guests need to be following a mutually agreed upon housing plan (see [Housing Plan and Navigation Assistance](#) standard) and be actively engaged in exit planning (see [Actively Engaged in Exit Planning](#) standard).

Navigation Center staff can submit a waiver of this standard to request an extension for an individual or household considered actively engaged. Extension requests must be resubmitted monthly after the initial six-month stay has lapsed and will include a rationale for the extended stay and updated exit plans.

Guests can appeal length of stay exits by demonstrating they are actively engaged in to find housing (see [Grievance](#) standard for more information).

Voluntary Supportive Services

Support services are voluntary. Guests cannot be discharged for lack of participation in services. However, guests have an obligation to be engaged in a housing plan (see [Actively Engaged in Exit Planning](#) section).

Grievance

All navigation centers must have a written grievance and complaint protocol that is provided to each participant upon intake and is publicly posted in a location visible to guests. The protocol must include:

- The opportunity for participants to present their case before a neutral decision-maker (a supervisor or manager who was not directly involved in the incident or situation of the grievance).
- Process for reporting assault or harassment against other guests or staff that includes non-retaliation protection for the reporting party.
- Accommodation of third-party advocates in the grievance process. Reasonable efforts must be made to coordinate with a participant’s advocate in order to schedule the appeal.
- A requirement that participants be given a written response to their grievance within a reasonable time frame.
- A provision that when a participant files a grievance related to his/her ability to stay in the shelter the action is suspended until the grievance process is completed unless allowing the participant continued residence poses a risk to the health and safety of other participants and/or staff.
- An appeals procedure that allows participants to appeal, at a minimum, decisions related to admissions denials for cause, terminations and disciplinary actions.

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- Provisions for providing participants with information about any subsequent appeals process available through any funding agency.

Participant Input

Programs shall provide guests with on-going opportunities to voice opinions, participate in program operation and programming, and make suggestions regarding programming and rules. This can be accomplished in a variety of ways including exit interviews, discharge surveys, one-on-one interviews, participant surveys, guest focus groups, inclusion of homeless or formerly homeless members on the agency board of directors, having homeless or formerly homeless people trained and hired as staff, and/or the creation of a participants' advisory council.

In addition to any other activities, shelters must host guest meetings once per month and provide at least 24 hours advance notice to participants of the meeting time and location.

Abuse Reporting

All navigation centers must have a policy that details any legal duties to report child or elder abuse and a written plan and process for reporting such abuse to the appropriate reporting agency. Additionally, shelters deploy non-retaliation standards for guests that report abuse or harassment against other guests or staff.

Safety Inspections

Routine safety inspections must be performed by navigation center staff to ensure guest and facility safety. All navigation centers must provide participants with the agency's safety inspection policy at intake.

All navigation centers must have a policy and procedures in place governing how and when searches of participants' private possessions may be conducted. Searches outside routine safety inspections may only be conducted when there is "probable cause" to believe that the person has in his or her possession something which may jeopardize the safety of other guests or staff, including a weapon, or illegal material, including illegal drugs, or something which is interfering with the peaceful enjoyment of the facility of other guests such as food that is attracting vermin. If the person does not consent to the search, and "probable cause" exists to search, the person must be given the choice of being discharged or being searched.

Pet/Service Animals

Navigation centers must have a policy regarding whether pets are allowed in the facility. Per ADA requirements, shelters must make reasonable accommodation for service animals. Additional information regarding ADA requirements for service animals from the U.S. Department of Justice is included in https://www.ada.gov/regs2010/service_animal_ga.html. According to this guidance, emotional support, therapy, comfort, or companion animals are not considered service animals under the ADA. These terms are used to describe animals that provide comfort just by being with a person. Because they have not been trained to perform a specific job or task, they do not qualify as service animals under the ADA.

Guest Mail

If a navigation center provides mail service, any mail sent or received cannot be interfered with (e.g., staff opening guests' mail, not providing mail to the guest on the day it is received, etc.).

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Emergency Response Plan

All navigation centers must have an emergency response plan in place.

Storage

Storage While Participant is in Shelter

All navigation centers must have a written policy that is provided upon intake as to what provision is made for securing belongings including what possessions can be held by the program at participant request such as money, medications, and vital documents.

If a navigation center holds funds or possessions on behalf of participants, this service must be voluntary, the program must maintain a log of items in their possession, and the funds or possessions must be promptly returned upon the participant's request. Each shelter should decide how specific to make their log, with consideration to their liability. It is expected that the log would track only those belongings that participants choose to store with the program and not all possessions brought into the shelter. This does not apply to belongings abandoned by a person who does not return to the shelter; in that situation, please refer to [Storage of Belongings After Discharge](#).

Navigation centers must provide lockable lockers, storage trunks or make other accommodations that allow participants to securely store their belongings. Reasonable access by the participants to their belongings must be provided. Waivers of the requirement that storage space be lockable can be requested if the physical layout of the shelter does not allow for lockable space.

Storage of Belongings After Discharge

Navigation centers must have a written policy for the storage of belongings after a participant exits, which must include at a minimum storage of belongings for at least five (5) working days after guest exit. A copy of the policy must be provided to all guests at intake.

First Aid

There must be at least one staff person on duty at all times trained in emergency first aid and CPR (unless granted a waiver to the on-site staffing requirement). Basic first aid supplies must be available on-site and accessible to staff at all times.

Medication

Navigation centers may not administer or dispense medication and may not require guests to turn over medication.

Navigation centers must have a written policy that is provided upon intake as to whether provision is made for securing prescription medications and guests' responsibility to store and utilize their medication safely. Shelters may encourage guests to lock medications in secure storage areas made available in order to protect medication from theft but may not require guests to turn over medication.

Navigation centers must make available a lockable storage area for medications and access to refrigeration for medications. This can include a locked box within a refrigerator that also serves other functions.

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Discharging

Discharge Reasons

Only the following reasons may be used as a basis for discharge from a shelter facility:

- Possession of a weapon at the facility
- Possession of illegal drugs on premises (see [Drugs and Alcohol](#) standard for additional information about drug and alcohol use by guests)
- Assault or other violent behavior
- Theft
- Destruction of property
- Restraining order precludes continued residence
- Participant behavior endangers health or safety of guests or staff
- Disclosure of confidential navigation center location
- Repeated interference with the rights of other guests to peaceful enjoyment of the facility
- Presence of infectious disease that significantly increases the risk of harm to other guests. Note that Guests with lice or scabies or exhibiting symptoms of TB should be allowed to stay in shelter and sent to a health care provider for treatment as soon as possible. Precautions should be taken to avoid spread as feasible. Noncompliance with treatment or containment measures that endangers other guests may be cause for discharge.
- Individual requires care and supervision to manage their activities of daily living (feeding, toileting, selecting proper attire, grooming, maintaining continence, putting on clothes, bathing, walking and transferring) without appropriate supports available on-site. Shelters must refer individuals needing a higher level of care to appropriate supports made available through In-Home Supportive Services and the health care system. Individuals discharged due to care and supervision needs cannot be discharged to the streets.

Guests may be discharged for refusing to work towards a housing plan and/or refusing multiple housing opportunities: however, evidence must be present that shelter staff actively attempted to engage the guest in services designed to support shelter exit to stable housing with consideration given to each guest's barriers to engagement.

Navigation centers are not required to hold beds for longer than 72 hours. If a participant is absent from their bed for 72 hours without appropriate notification of shelter staff regarding absence, the participant may be discharged.

While guests may be encouraged to get a TB test, lack of a test cannot be used as a reason for discharge. If a guest is exhibiting symptoms of TB and does not comply with testing and treatment recommendations, the guest may be discharged to protect the health and safety of other shelter guests and staff.

Discharge Requirements

All navigation centers must provide a written copy of the procedure for filing a grievance to the guest when a guest is involuntary discharged. If it is infeasible to provide the procedure at the time of

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discharge (e.g., the guest is being removed by law enforcement) this requirement may be waived; however, if the participant returns subsequently to the facility, the grievance procedure must be provided. (Additional requirements related to grievance protocols are included in the [Grievance](#) standard).

If a participant may be denied future readmission as a result of the circumstances of discharge, the participant must be informed of the reason, the conditions for lifting the restriction and right to appeal, including whom to contact regarding an appeal and information about the appeal process.

Unless the participant poses an immediate threat to the health and safety of other guests and/or staff members, shelters should avoid discharging participants at night.

Unless the participant poses an immediate threat to the health and safety of other guests and/or staff members, involuntary discharges must be approved by a supervisor. During hours that there is no supervisor on site, there must be a supervisor available on call to approve discharge decisions. Approval may be given verbally but should be documented in case notes.

Support Services

Navigation centers are strongly encouraged to provide services that support exits to stable housing including information and referral, linkage to other services as needed, assistance with accessing services, benefits linkage and advocacy, provision of or referral to employment services, and regular check-ins about progress towards the shelter exit plan.

Housing Problem Solving

Housing Problem Solving (HPS) is a conversation-based strategy aimed at helping persons experiencing homelessness find safe housing solutions with minimal or no housing crisis response system resources. HPS services are offered when people experiencing or at risk of immediate homelessness first reach out for assistance to resolve their housing crisis. Its strategies are also applied throughout a person's path to housing, with HPS continually offered while people are receiving outreach services or staying in shelter or transitional housing programs. HPS uses creative, interactive conversation to understand factors that contributed to a person's housing crisis, explore possible solutions that may be available through personal or community resource networks, and develop an action plan to make identified housing options possible.

As part of the County's CES redesign efforts, Housing Problem Solving delivery is being integrated into the process for system entry. Additional standard information will be included when the CES redesign work is operationalized.

Housing Plan and Navigation Assistance

A housing plan must be developed as soon as possible with the guest upon entry. The development of a housing plan should include inquiring about and fostering family and/or friend relationships that may open up potential housing opportunities, including inviting those people to participate in housing plan conversations if and when appropriate, and with consent from the guest. Ongoing housing search assistance shall be provided while the household is staying at the shelter.

Shelter staff may find case management tools helpful to develop housing plans such as those used in the Strengths Model and Critical Time Intervention.

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CES Follow-up

Navigation centers are strongly encouraged to follow up to ensure that guests connect with services to which they are referred through the County's Coordinated Entry System. The intention of this is to ensure participants have the support and information needed to make a successful connection when a referral is made. Additional standard information will be included when the CES redesign work is operationalized.

Exit Planning

Navigation centers must develop exit plans with all households served, including linkage to aftercare resources.

Outside Service Linkage

Navigation centers must have a resource area that guests can access without staff assistance that provides information about available community services and housing opportunities. Shelters are strongly encouraged to provide or link participants to drug and alcohol services, mental health services, life skills services, employment services, money management/credit counseling, parenting support and other services as needed. Examples include:

- Health services access: Shelter staff should encourage guests to obtain and maintain health insurance, obtain a primary care provider and access immunization service. This must include publicly posting or otherwise making available information on health-related services.
- Drug and alcohol dependency services through the County's Substance Use Disorders Division.
- Behavioral Health services such as through the County's Behavioral Health Access Team
- County Benefits: Shelter staff should connect participants to all potentially eligible benefits and service programs, such as General Assistance, CalFresh, and MediCal.
- Employment connections to programs such as CalFresh Employment and Training and Workforce Innovation and Opportunity Act (WIOA).

Transportation

Navigation centers are strongly encouraged to provide assistance with transportation to appointments which can include assisting guests to access public transportation. Shelters are permitted, but not required, to have policies regarding how to prioritize the allocation of limited transportation resources such as bus passes or taxi vouchers.

Food Service

Sanitary facilities

All shelters that either prepare and serve meals or provide areas for guests to prepare and consume their own meals must ensure that all areas used for food storage and preparation are sanitary. Kitchen and dining areas must be kept clean and comply with all relevant health codes.

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See <https://scceh.com/Home/Programs/ConsumerProtectionPrograms/FoodFacilityInformation.aspx> for additional guidance related to safe food preparation.

Dining Facilities

Shelters must provide a table and chairs if food is served.

Donated Food

Programs that serve food prepared off site by regular donors must provide donors with a handout that details the requirements for food preparation. All food donors must read and sign the handout to confirm knowledge of the standards and must provide current contact information.

Programs are discouraged from accepting food that has been prepared off-site by intermittent donors.

Meal Schedule

If meals are served, a meal schedule must be posted.

Dietary Modifications

If meals are served or food is provided for guests to use to prepare their own meals, shelters must make dietary modifications and/or provide appropriate food options based on guests' health, allergies, religious, and/or cultural practices.

As feasible, food provided should promote healthy eating.

CalFresh

Shelters cannot accept a guest's CalFresh benefits but should assist with application assistance linkage.

Staffing Requirements and Training

Staffing Qualifications

Ongoing professional development and supervision must be provided by the agency and may include case conferences, case supervision, workshops and training courses. Shelter providers should maintain a log or other similar record of trainings each staff member has successfully completed. This may be maintained in the personnel file or through a separate tracking system.

Staff on Duty

Navigation centers must have sufficient staff on duty at all times. When only one staff person is scheduled on a shift, shelters must make provisions to have on-call staff available. Shelters must have at least one staff on duty and awake during all hours of operation. If the size of the shelter and population served by the shelter do not always warrant on-site staff, the shelter may request a waiver of this requirement. Shelters granted a waiver must have staff on-call and available by phone during all times that guests are on-site. Shelters must have a supervisor/manager available on call to the program at all times for consultation to staff about challenging guest situations and other urgent matters. All shelters should have a consultation policy in place that outlines situations requiring consultation up the chain of command.

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Infectious Disease Control

All shelter staff must be tested for tuberculosis every 12 months and referred to any necessary follow up and/or treatment if indicated. Staff must comply with any recommended follow up testing necessary as indicated by a health care provider.

Staff should be encouraged to obtain an annual flu vaccine.

Required Training

The following trainings must be provided to all staff within 30 days of hire:

- Confidentiality protocols
- Crisis prevention and/or verbal de-escalation
- Mandatory reporting requirements related to child/elder abuse
- Universal precautions/infectious disease prevention
- Proper food handling and storage if required by law. State law requires all food handlers in the state of California have a California Food Handler Card. New hires have 30 days from the date of hire to obtain a card.
- Anti-discrimination/reasonable accommodation training including accommodation of transgender guests
- Shelter policies and procedures
- Emergency evacuation procedures and fire safety
- HMIS Privacy and Security Certification Training (for HMIS users only)

Recommended Training

- Ethics/boundaries
- First Aid/CPR (at least one staff on site as required in [First Aid](#) standard)
- Housing Problem Solving
- Harm reduction approach to substance use disorders
- Domestic violence recognition and referral
- Diversity Awareness/cultural awareness/humility
- Overdose detection and response
- Mental Health issues in the homeless population
- De-escalation Techniques

Administration

Homeless Management Information System (HMIS)

All navigation centers must participate in HMIS or a comparable system for Domestic Violence providers.

Data Quality

All navigation centers must utilize HMIS (or comparable) data quality reports to ensure the accuracy of submitted information. All HMIS participating agencies must designate at least one staff who serves as the HMIS Lead. HMIS leads are required to attend monthly meetings with the County's HMIS System

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Administrators to learn about best practices, new software features, data quality issues, and new HMIS related policy and procedures. Agency HMIS leads are responsible for sharing with their respective agencies information obtained from these meetings and through communications with HMIS System Administrators.

Confidentiality

All navigation centers must have confidentiality policies that at minimum are consistent with Homeless Management Information System (HMIS) privacy and security requirements, make certain that files are kept in a secure or locked location, and ensure that verbal communication of confidential information is done in such a way that avoids unintended disclosure.

Recordkeeping

Navigation centers must have written intake and client record keeping procedures and files that include intake interviews and records of services provided.

Tracking Available Beds

HMIS has a new referral to shelter bed feature that is being piloted with Housing Matters' Rebele Family Shelter. Additional standard information will be included when the CES redesign work is operationalized.

Tracking Denials

All shelters must track all reasons for denials based on cause (this does not include denials because the shelter is at capacity) and report this information to the County.

Tracking Discharges

All shelters must track all reasons for involuntary discharge and report this information to the County.

Tracking Services Provided

All shelters must track supportive services provided and report this information to the County.

Staff Hiring and Supervision

The agency must have written job descriptions for all shelter positions.

Shelters must conduct criminal background checks on all staff members. Each agency shall have a policy regarding when criminal history would disqualify an applicant from hiring that considers the particular responsibilities of the position to be filled, the population to be served (e.g., will the position be interacting with minors), the nature, severity and recentness of the crime, and evidence of rehabilitation.

Shelters must follow all local and state minimum and living wage ordinances.

Board of Directors

The agency must have a volunteer Board of Directors that meets at least quarterly.

Fiscal System

The agency must have an accounting system that is maintained in accordance with Generally Accepted Accounting Principles (GAAP). The shelter shall have internal fiscal control procedures that are reviewed and approved by its Board of Directors.

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Physical Building Standards

Basic Building Standards and Fire Safety

All facilities must comply with HUD Emergency Solution Grants facility standards (HUD ESG Facility Standards and local applicable building and fire codes. Evidence of compliance with local codes must be provided. Facilities that do not have a fire alarm system designed for hearing-impaired guests may request funding from H4H for this purpose that is separate from the shelter's regular operations allocation.

Facilities must have annual fire inspections conducted by the fire department and conduct regular fire drills.

Training must be provided to staff on fire safety.

Safety Standards

Shelters must comply with state and local health, environmental and safety standards.

Toilets/Showers

Shelters must provide sufficient toilets and wash basins with warm and cold running water. The guest to toilet ratio must be 1 toilet/15 guests (excluding infants) or 1:30 if over 100 guests.

Shelters must make a reasonable supply of showers available or provide referrals to community shower access. The guest to shower ratio must be 1 shower/20 guests (excluding infants).

Hygiene Products

Shelters must provide toilet tissue, soap, towels, and feminine hygiene products (if females served).

Beds/linens

Shelters must provide a bed, crib or cot, clean mattress and pillow, linens, and towels. For shelters using tents, sleeping bags and mats must be provided.

Linens and sleeping bags must be laundered regularly and/or when soiled. These items can be laundered by shelter staff, or a shelter may require guests to launder their own linens/sleeping bags if facilities are available. Newly laundered linens/sleeping bags must be provided to each new guest upon entry.

Electrical Outlet Access

Shelters must provide access to electrical outlets for charging cell phones and medical equipment.

Phone Access

A telephone must be available to staff for emergencies. Emergency numbers should be posted by the telephone or otherwise made available to on duty staff. Shelters must take emergency phone messages and messages from service providers for guests in residence. If the shelter has periods where no staff are on duty, there must be a phone available to guests for emergencies with information posted nearby with emergency numbers.

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Pest Control

Shelters must ensure adequate provision of pest control services. Shelters must have a protocol in place for the prevention and control of bed bugs. (See <https://www.cdc.gov/parasites/bedbugs/> for best practices related to bed-bug prevention).

24-hour notice must be provided to guests of pest control activities unless the type and degree of infestation requires an immediate response (e.g., bed bugs).

Maintenance/Repair

Facilities must be maintained in good repair. The general appearance of the building must be well maintained. There must be a written housekeeping and maintenance plan. Shelters must post the process for reporting maintenance concerns, acknowledge issues reported within two days, and identify the timeframe for addressing the concern. Emergency maintenance items must be immediately addressed.

Cleanliness

Bath/toilet areas, hallways, and other common use areas must be cleaned daily. Shelters must have proper trash receptacles that are emptied regularly. Both the interior and exterior of the facility must be free of debris, clutter, and unsanitary items and there must be no obvious safety risks.

For additional cleaning guidance, refer to the Congregate Shelter COVID-19 Policies and Recommendations.

Hazardous Materials

Shelters must label all chemicals and cleaning supplies and keep all such materials out of reach of children. Any hazardous materials must be stored separate from food.

Building Entrances/Exits

Exits must be clearly marked and must be kept clear of blockage and tripping hazards. All steps must have handrails as required by applicable codes. Steps must have treads or similar accommodation to prevent slipping. Exit signage must be consistent with all applicable codes.

Agency Vehicle

If a shelter maintains a vehicle used for guest transport, the vehicle must be properly maintained, licensed, and insured. All drivers must be properly licensed. Car seats must be used by children. Provisions must be made to provide equal access to transportation services to disabled guests.

Health Standards

COVID-19

See Congregate Shelter COVID-19 Policies and Recommendations for standards guidance and required public health protocol related to COVID-19.

Infectious Disease

All shelters must have policies for responding to infectious disease including tuberculosis (TB) and lice/scabies along with staff trained in infectious disease response in place. See [Disease Reporting](#)

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[Information \(santacruzhealth.org\)](http://santacruzhealth.org) for a full listing of reportable diseases. These policies must include protocols for:

- Making referrals to health care providers when a guest shows symptoms of TB, lice, or scabies.
- Notifying guests when there is a possibility that they were exposed to a communicable disease that is spread through casual contact.
- Policies on participant confidentiality related to communicable diseases.
- Protocols for responding to any identified communicable disease, including consultation with a medical professional when determining if a guest is infected with a contagious communicable disease that might seriously endanger the health of other guests.

A TB test may not be required as a condition of entry.

An infectious disease that significantly increases the risk or harm to other guests may be a reason for denial or discharge. Guests with lice or scabies or exhibiting symptoms of TB shall be allowed to stay in the shelter unless the disease or infestation cannot be appropriately contained (e.g., due to close quarters of facility), in which case those guests may be discharged and referred to a health care provider for treatment.

Noncompliance with treatment or containment measures that endangers other guests may be cause for discharge.

Shelters must comply with California Code of Regulations, Title 8, Section 5199, regarding Aerosol Transmissible Diseases (ATD) control and worker and client safety expectations:

<http://www.dir.ca.gov/title8/5199.HTML>. For additional guidance on this regulation and for information regarding best practices for control of infectious disease, please also refer to “Preventing Tuberculosis (TB) in Homeless Shelters” published by the Los Angeles County Department of Public Health: <http://publichealth.lacounty.gov/tb/docs/LATBGuidelinesforShelters.pdf>.

Higher Level of Care

Individual requiring care and supervision to manage their activities of daily living (feeding, toileting, selecting proper attire, grooming, maintaining continence, putting on clothes, bathing, walking and transferring) must be connected to appropriate supports. See [Discharge](#) standards for additional information.

Family Shelter Standards

Family Definition

A family is defined as a household that includes one or more minor children (17 or under) in the legal custody of one or more adults who, prior to losing housing, were living together and working cooperatively to care for the children. This includes 2-parent and 1-parent families, including those with same-sex partners, families with intergenerational and/or extended family members, unmarried couples with children, families that contain adults who are not the biological parents of the children and other family configurations.

Child Supervision

Children must be supervised at all times by parents, staff or volunteers following established staff to child ratios.

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Child Safety Proofing

The shelter facility must be child safety proofed including:

- Childproof electrical outlets.
- Floors above ground have precautions in place to prevent children from falling out of windows (see <https://www.nsc.org/home-safety/safety-topics/child-safety/window-safety> for tips)
- Doors open from inside without a key.
- There are precautions in place to protect children from burns (from stoves or other heating units).
- There are precautions in place to protect children from injury from fans.

Inspections

Annual safety inspections must be performed by agency staff to ensure child safety.

Facilities

Adequate space must be provided for bathing and changing young children and feeding children. Private space should be offered for breastfeeding.

Diaper changing space

Shelters that house infants must provide an appropriate, sanitary place for use by parents to change diapers.

Play Space

Play space for infants, toddlers, and preschoolers should be provided as feasible within the confines of the physical space available in the shelter.

Collaboration with Early Childhood Programs

Shelters must have procedures in place for collaboration with local early care and education programs (e.g., Head Start, Early Head Start, childcare subsidy programs).

Collaboration with Schools

Shelters that serve families must have procedures in place for collaborating with local K-12 education support programs and the schools. Heads of households must be advised of their rights as they relate to the public education system. Shelter policies and practices must be consistent with laws related to providing education services to individuals and families.

Shelters must have a designated staff person responsible for ensuring that children are enrolled in school and receive educational services, as appropriate. The staff person may be either an operations or a support services staff person.

Resource Referrals

Shelters must post information about and support access to Head Start, childcare, preschool, etc. and support connections to mainstream benefits.

Home Visits

Shelters must provide space for home visits to occur either on-site or at another location.

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Toys

Shelters must maintain developmentally appropriate toys and books that are clean and in good repair.

Food Storage and Preparation

Shelters must provide refrigeration and cooking equipment to prepare and store formula, baby food and milk.

Furniture/Cribs

Shelters must provide age-appropriate cribs/beds.

Document Properties

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