

Data Quality Plan

Data Quality and Completeness

- CDSA will provide training guides, checklists and guidance.
- CDSA will issue proficiency certificates to Users beginning 2025.
- For TH, RRH, PSH project types, Agencies must require documentation at intake of the homeless status of Clients according to the reporting and eligibility guidelines issued by HUD. The order of priority for obtaining evidence of homeless status are (1) third party documentation, (2) worker observations, and (3) certification from the person. Lack of third-party documentation may not be used to refuse emergency shelter, street outreach or domestic violence services.
- Data must be entered into HMIS within 24 hours of the event. (see Data Timeliness)
- All staff are required to be trained on the HUD definition of Homelessness, regardless of program type.
- Documentation of HMIS training provided by CDSA and by the participating agency must be available for audit.
- There should be congruity between the following HMIS data elements, based on the applicable homeless definition: (Is Client Homeless, Housing Status, Prior Living Situation and Length of stay at prior living situation are being properly completed).
- If using paper, the intake/exit data collection forms should correctly align with the HMIS workflow. Direct data entry is encouraged.
- The Agency will have a process to ensure that First and Last Names are spelled properly and the DOB is accurate.
 - An ID may be requested at intake to support proper spelling of the Clients name as well as the recording of the DOB. This is voluntary unless the project requires it for eligibility.
 - If no ID is available or if the Client chooses not to show ID, staff will request the legal spelling of the person's name.
- The Agency is responsible to determine Clients with significant privacy needs or those who choose not share any data and follow the appropriate policies and procedures to reduce visibility in the HMIS.
- If the System Administrator removes the Client name and other PII from the HMIS at the request of the Agency, the agency must keep a document of the crosswalk of the Client ID and the Client s Name and PII in a secure location on site. This document can be monitored by CDSA and project funders.
- HMIS data must be updated when the Agency becomes aware of a change when possible, or at minimum annually and at exit.
- Agencies have an organized exit process that includes:
 - Clients and staff are educated on the importance of planning and communicating regarding discharge. This is evidenced through staff meeting minutes or other training logs and records.
 - Agency staff are trained in HUD s destination definitions.
 - There is a procedure for communicating exit information to the person responsible for data entry.

- HMIS Analyst regularly runs data quality reports (at least monthly).
- The HMIS Analyst will distribute a quarterly data quality report to all Agency staff and management which provides the percentage of missing or unknown/refused required HUD data elements. *The goal is for less than three percent (3%) missing or unknown/refused entries for each data element.*

The HMIS data collection years are based on:

1. The operating year of the grant (OY)
2. The fiscal year (FY 07/1 to 06/30)
3. The calendar year (CY 01/01 to 12/31)
4. The federal fiscal year (FFY 10/1 to 9/30)

All data for the data collection years must be complete and accurate no later than the third day of the month following the end date.

Data quality screening and correction activities may also include the following:

- Missing or inaccurate information in Universal Data Element Fields, Program Data fields and local data elements.
- Un-exited Clients using the Length of Stay and Un-exited Client Data Quality Reports.
- Count reports for proper ratio of children to adults in families. (at least 1.25)
- It is recommended that Agencies use HMIS to monitor their performance at least quarterly. CDSA will provide system-wide performance report annually.

Data Timeliness

Data must be entered into HMIS within 24 hours of the event. This includes new client records, project entries, project exits and upon receipt of updated information. Service transactions should also be entered at the time of the service.

The Agency's Agency Administrators are responsible to ensure that data are complete, accurate, and timely. CDSA HMIS Analysts will monitor projects to ensure data completeness and timeliness policies are being followed. A quarterly data quality report will be provided to participating agencies and the HMIS Joint Advisory Committee.

HMIS Use

Each Agency must be logged in and actively using Wellsky Community Services.

- A User Last Login Report will be run every month. This report shows all user activity for agencies in HMIS. All users must be actively engaged in using HMIS.
- All projects will also be subjected to random user audits to ensure that data is being entered and HMIS is being used correctly.
- For any Agency where all User have not logged in within the past month, an informal inquiry e-mail will be sent to the Agency Administrator. The Agency Administrator must write back within 48 hours as to why Community Services has not been utilized within the report time period.
- All agencies must log in to Community Services within the last two calendar months (at least one User). If there has not been any user logged in within two calendar months, a more formal disciplinary action will be taken.

Disciplinary Process

The following describes the disciplinary process for not following the agreed upon terms:

- If not logged into HMIS within the last calendar month OR if data is not being entered in a timely manner, an informal inquiry e-mail will be sent. The Agency Administrator must respond within 48 hours.
- If the agency is still not logging into HMIS within the last two calendar months OR if data is still not being entered in a timely manner, an official warning letter will be sent to the Agency Administrator and Executive Director. An official warning letter may also result in a deduction of points for your HMIS score for the CoC competition process.
- If an agency receives two warning letters within the calendar year, this will result in a 0 for the Agencies entire HMIS score for the CoC competition.
- If an agency is still not utilizing the HMIS correctly after two warning letters in a calendar year, a meeting with the appropriate Executive Director (CDSA for OK-500, Kibois for OK-507), Agency Administrator, and applicable CDSA staff will take place to discuss further discipline. This could include loss of federal, state or local funding.

HMIS Monitoring

CDSA is the HMIS Lead for OK-500 and OK-507 and is responsible for monitoring and enforcing compliance by all HMIS Participating Providers with all the HUD requirements and report on compliance to the Continuum of Care and HUD. The Agency Participation agreement explicitly states that each agency will be monitored. Each agency will be monitored at minimum every three years.

Monitoring addresses compliance with the following:

- National Objectives;
- Client eligibility;
- project performance;
- confidentiality and privacy policies;
- agency agreements with CDSA;
- overall management systems;
- financial management and audits;
- adherence to federal grant regulations;
- Client records;
- records maintenance;
- anti-discrimination,
- affirmative action and equal employment opportunity.

The objective is to monitor HMIS project recipients to:

- Ensure HMIS Privacy and Security regulations are being met.
- Ensure that Client records match HMIS Client records.
- Ensure that projects are meeting national data quality objectives.
- Ensure that project's and activities recipients support operates in a consistent, effective, and efficient manner; consistent with the project's intent.

HMIS Coordinated Entry

An effective coordinated entry process evaluates and connects those most in need in the community with the most appropriate available resources for their situation as swiftly as possible the process should be low barrier, housing first oriented, person-centered, and inclusive.

In the coordinated entry process, also called Front Door Assessment (FDA), Clients are assessed by a standardized survey at the point of entry and are prioritized accordingly. CDSA uses the HMIS as part of this process. HMIS is used to:

- ❖ Store Assessments
- ❖ Run Reports
- ❖ Prioritize Client Waitlist
- ❖ Maintain the Central Waitlist
- ❖ Make Referrals

Grievances

Client Grievances: Clients with a HMIS-related grievance should first identify their concerns to their regular Agency staff member. Upon learning of the grievance, the Agency staff member is required to communicate the concern to their HMIS Agency Administrator for review and possible resolution.

Each participating Agency is responsible for addressing Client questions and complaints regarding the HMIS to the best of their ability and in accordance with their agency grievance policies. Possible actions may include further investigation of incidents, clarification or review of policies, or sanctioning of users (if users are found to have violated standards set forth in HMIS agreements or this Standard Operating Procedures Manual). Participating agencies are also obligated to report all HMIS-related Client grievances to the HMIS System Administrator.

Grievances regarding Coordinated Entry have a separate process.

If a Client grievance is not satisfactorily resolved at the Agency level, the Client may contact the HMIS Administrator who will attempt to resolve the issue. If necessary, the System Administrator will present the problem to the HMIS Advisory Committee (HAC) at their next meeting.

The HAC will be given an opportunity to review the details and facts of a situation and will present recommendations towards resolution to the appropriate CoC Board meeting. The appropriate CoC Board will have final decision-making authority.

Agency Grievances: Any problems related to the operation or policies of HMIS or its participating agencies should be directed to the HMIS Administrator. S/he is responsible for addressing agency level questions and complaints regarding the HMIS to the best of their ability. Possible actions may include further investigation of incidents, clarification or review of policies, or sanctioning of participating agencies. The HMIS System Administrator is also obligated to report all HMIS-related agency grievances to the HMIS Advisory Committee.

If an agency issue is not satisfactorily resolved by the HMIS System Administrator, the agency may bring the issue to the Data Quality Collaborative. The HMIS Advisory Committee will provide information related to the details and facts of a situation to the HAC as well as recommendations towards resolution. The HAC will have final decision-making authority.

The HMIS System Administrator will be responsible for providing a summary of all grievances and their resolutions to the HAC on a monthly basis.

HMIS Staff Grievances: Any problems with the HMIS Support Staff should first be reported to the HMIS Lead. The HMIS Lead will seek to resolve the issue and will identify staffing concerns to the CDSA Executive Director. Any grievances against the HMIS Lead should be made directly to the CDSA Executive Director for resolution. [Grievance forms](#) are located in the Appendix of this document.

Termination of HMIS Participation

Voluntary Termination: To discontinue participation in HMIS, an agency must submit written notice to the HMIS System Administrator. Upon receipt of this written notice, all licenses assigned to that agency will be discontinued within 72 hours.

Involuntary Termination: If the HMIS Advisory Committee decides to terminate an agency from the HMIS, the committee will submit a written notice to the Agency's Executive Director identifying a termination date. On that termination date, all licenses assigned to that agency will be discontinued at 5pm, unless an effective date was otherwise established.

Regardless of the reason for termination of participation in HMIS, any costs associated with transferring/exporting data out of the HMIS will be the responsibility of the terminated agency.