



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	201
Date Approved:	05/04/2007	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	1/24/2013

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - Responsibilities for HMIS Administration (§580.5)
MFIN Roles & Responsibilities – Participation Requirements

POLICY:

Participation Requirements: A qualified MFIN Member Agency is required to sign and abide by the terms of the MFIN Member Agency Agreement. The MFIN Member Agency Agreement is a legal contract between the MFIN Member Agency and MFIN regarding specific guidelines and use. The agreement outlines specific details about the MFIN Member Agency's MFIN involvement including, but not limited to, the areas of confidentiality, data entry, security, data quality, and reporting.

PROCEDURE:

1. The Agency's Executive Director (or legal authorized officer) will sign two copies of the MFIN Member Agency Agreement and forward them to the MFHC.
2. Upon receipt of the signed agreement, it will be signed by the MFHC Executive Director.
3. Upon signature of the MFHC Executive Director, one original will be filed with the MFHC; the other will be returned to the MFIN Member Agency.

See Form 201-A - MFIN Member Agency Agreement



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Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	201.1
Date Approved:	01/24/2014	Author:	MFIN Committee
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AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - Responsibilities for HMIS Administration (§580.5)
MFIN Roles & Responsibilities – Federal / State Funded Providers

POLICY:

A service provider whose primary mission involves solving homelessness and receives certain McKinney-Vento or other homeless funding is required to actively enter data in the Mid Florida Information Network. Domestic Violence shelters are not required to participate in MFIN. However, Domestic Violence shelters receiving certain McKinney-Vento funding agree to collect data in accordance with the funder's guidelines, enter the data into a comparable database, and provide access to MFIN admin staff to verify data collection.

PROCEDURE:

To participate in MFIN, member agencies must sign and agree to abide by the terms of all agency and user-related MFIN forms as well policies and procedures outlined in this document

All member agencies that receive funding from the U.S. Department of HUD CoC Programs, and those receiving Emergency Solutions Grant funds through Florida Department of Children and Families are mandated to participate in the local HMIS, which is MFIN in FL520 – Citrus, Hernando, Lake, Sumter Counties CoC. Additionally, all member agencies which receive funding from MFHC are required to participate in MFIN. Some local organizations (Citrus County FEMA

for example) providing funding for homeless or homeless prevention services also require participation in MFIN by contract.

Definitions:

Under §580.3, a comparable database means a database used by a victim service provider that collects client-level data over time and generates unduplicated aggregate reports based on the data. It must also meet HMIS data, technical and security standards established by 24 CFR §580 and outlined within this Policy and Procedure Manual.



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Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	201.2
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AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - Responsibilities for HMIS Administration (§580.5)
MFIN Roles & Responsibilities – Non Federal / State Funded Providers

POLICY:

Homeless providers who are not receiving grants that require entry into HMIS (excluding Domestic Violence facilities) or service providers whose primary mission is not homeless related, but who provides basic needs, prevention, diversion or wrap around service are strongly encouraged to actively enter data in the Mid Florida Information Network (MFIN).

PROCEDURE:

Any 501c3 organization or government entity that provides a health and human service may qualify to participate in Mid Florida Information Network. To participate in MFIN, member agencies must sign a MFIN Member Agency Agreement and agree to abide by the terms of all agency and user-related MFIN forms and policies and procedures outlined in this document. Participation is voluntary but strongly encouraged.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	203
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AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - Responsibilities for HMIS Administration (§580.5)
MFIN Roles & Responsibilities – Agency Staff Roles & Requirements

POLICY:

Each Mid Florida Information Network (MFIN) Member Agency is required to have either an agency administrator (for agencies with 5 or more active licenses) or a point of contact to coordinate MFIN activities for their organization.

PROCEDURE:

The Executive Director (or legal authorized officer) of the agency will complete the agency administrator designation / point of contact form to assign the position to a specific staff person. This role is vital to the success of MFIN to ensure that the data is entered in a timely manner, the quality of data is continuously monitored, and communication and support between MFIN and the MFIN Member Agency is streamlined.

Definitions:

Agency Administrator – is the centralized contact for MFIN staff; first line of technical assistance to their users; participates in Coordinated Access-MFIN Committee Meetings

Point of Contact – is the centralized contact for MFIN staff

See Form 203-A –Designation of Agency Administrator or Point of Contact Form



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	204
Date Approved:	1/24/2014	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	1/24/2014

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - Responsibilities for HMIS Administration (§580.5)
MFIN Roles & Responsibilities - End User Roles & Responsibilities

POLICY:

Each Mid Florida Information Network (MFIN) End User must attend at least one new user training, attend annual security training, and sign a MFIN privacy notice receipt in order to access live client data in MFIN.

Every MFIN End User is responsible for the following:

- Adhering to all the policy & procedures outlined in this document
- Attending all trainings required by MFIN staff and the MFIN Member Agency administrator
- Entering quality data in a timely and accurate manner
- Adhering to the data requirements set by the MFIN staff and the MFIN Member Agency

PROCEDURE:

Agencies with new users must contact the HMIS Administrator to arrange New User Training. Users requesting additional training must also contact the HMIS Administrator to arrange the necessary training.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	205
Date Approved:	01/24/2014	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	8/25/2017

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - Responsibilities for HMIS Administration (§580.5)
MFIN Roles & Responsibilities – Initial MFIN Staff Site Visit

POLICY:

After signing the Mid Florida Information Network (MFIN) agreement, a new MFIN Member Agency will schedule and complete an on-site initial MFIN visit at the Agency location where client data is entered and stored.

PURPOSE:

At the site visit, MFIN staff will review the data security & quality compliance procedures, review policies & procedures, and required data elements. The site visit also allows MFIN staff to identify any potential security risks that will need to be mitigated by the MFIN Member Agency prior to beginning data entry.

PROCEDURE:

MFIN Staff will contact new MFIN Member Agency to schedule the on-site visit. This visit is between the MFIN staff, and the Agency Administrator or Point of Contact (refer to Policy 203); it is recommended the Agency include any staff they feel is necessary to MFIN data entry, data quality or reporting process.

See Form 205-A - MFIN On-Site Initial Visit Checklist



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	206
Date Approved:	01/24/2014	Author:	MFIN Committee
Last Reviewed:	78/12/2019	Last Updated:	8/25/2017

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - Responsibilities for HMIS Administration (§580.5)
MFIN Roles & Responsibilities – MFIN Minimum Technical Requirements

POLICY:

All Mid Florida Information Network (MFIN) end user workstations must meet minimum technical requirements in order for MFIN to be functional and to meet the required security specifications.

PURPOSE:

The following details are the minimum set of technical requirements for hardware and internet connectivity to MFIN:

Minimum Requirements

Operating System: Windows 7+, Mac OSX 10.5+

Processor Speeds: Intel or AMD Dual Core

RAM: 1GB RAM

Connectivity: Cable or ISDN

Authorized browsers: Internet Explorer 9+, Google Chrome, Firefox, or Safari

Firewalls: Yes

Routers: Yes

Desired Requirements

Operating System: Windows 7+, Mac OSX 10.11

Processor Speeds: Intel i3

RAM: 4GB RAM

Connectivity: 20kbps per User

Workstation: should have their caches refreshed on a regular basis to allow for proper speed and functionality; should continue to be updated to the most current version of Java; may need to have their virtual memory increased; should not be set to automatically save usernames and passwords

Virus protection: Every computer that accesses MFIN must have current virus protection that runs automatically on at least a weekly basis, but preferably daily.

Form 206-A MFIN Compliance Checklist



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	301
Date Approved:	05/04/2007	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	8/4/2016

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Data Quality Standards (§580.37)
Data Sharing – Data Sharing

POLICY:

The Mid Florida Information Network (MFIN) is an opt-out system as we are an open CoC that wants to share data with other agencies.

It has been established that the data that is being entered by each agency belongs to that agency. Agencies can run reports that include any and all data entered by that agency's personnel. Mid Florida Homeless Coalition, as the Administrator for the MFIN, has client level and report access to both Shared and Not Shared data, but will not provide client level data that belongs to one agency to another.

A Homeless Management Information System is not a part of the Sunshine Law and information should only be provided to law enforcement via a court order.

How organizations use Personal Information that is collected and Shared or Not-Shared is listed in the Mid Florida Information Network Full Privacy Notice.

MFIN's current system has a variety of sharing options. Settings may be different for each of the following categories:

Clients Created – this category refers to the Client Profile

Not Shared will allow all users to view SSN, name, DOB and client id;

Shared will allow all users to see all elements of the client profile screen.

Default setting for all agencies on initial set up in system is Shared. Agencies wishing to make this function Not Shared must indicate so on form 301-1.

Services / Programs / Assessments Placed

Not Shared – other agencies will not see any information about service, program or assessment transactions

Basic Shared – other agencies will see that service and program transactions have occurred, but will not be able to edit or see details of these transactions.

Full Shared – users from other agencies have full access to all information relating to service or program transactions, and have the ability to edit the transaction.

Default setting for all agencies on initial set up in system is Shared. Agencies wishing to make this function Not Shared must indicate so on form 301-1.

Notes – includes Client Notes and Public Alerts

Not Shared – staff from other agencies cannot view public alerts or client notes

Basic Shared – staff from other agencies will see the Public Alert on the Client Profile Screen; they can also add a new Note, but cannot edit/delete an existing note from other agencies, and only see the title, the staff person who entered the note, and the date of the existing notes by other agencies

Full shared – staff from other agencies can add/edit public alerts, but cannot delete public alerts generated by another agency; can add/edit client notes, but cannot delete client notes generated by another agency

Default setting for all agencies on initial set up in system is Shared. Agencies wishing to make this function Not Shared must indicate so on form 301-1.

Files –includes Client Files and Client Forms that can be downloaded and stored in Files tab of the client record

Not Shared – staff from other agencies will not be able to view Client Files and Client Forms

Basic Shared – staff from other agencies will be able to review Client Files and Client Forms but cannot delete them.

Full Shared – staff from other agencies will be able to view Client Forms, and View and upload new versions of Client files; however they cannot delete Client files or Client forms.

Default setting for all agencies on initial set up in system is Shared. Agencies wishing to make this function Not Shared must indicate so on form 301-1.

Location (refers to the various types of addresses that are recordable)

Not shared – staff from other agencies will not have access to any addresses entered by the agency

Basic Shared – staff from other agencies will be able to view the client’s address, but will not be able to edit or delete any address entered

Full shared – staff from other agencies will be able to view and edit the client’s location, but will be unable to delete the location.

Default setting for all agencies on initial set up in system is Shared. Agencies wishing to make this function Not Shared must indicate so on form 301-1.

Individual Exceptions – An agency can choose to have a category set to Basic Shared or Full Shared, but for some types of entries, a user can set an individual entry to “private”, and even though the agency’s share setting is basic shared or full shared, that particular entry will be Not Shared. Types of entries that have this option: Programs & Services, Notes, Public Alerts, Locations, Files, Forms

Agency Exceptions

An agency exception can be created when you need a particular agency to have sharing settings that differ from the Sharing Default settings.

Procedure: Each agency must provide written request for share settings to be changed. Refer to Form 301-A – MFIN Share Settings in the appendices.

See form 301-A – MFIN Share Settings



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	401
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AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - HUD HMIS Security Standards (\$580.7)
User Administration - End Users

POLICY:

All End Users must be provided with training through MFIN staff prior to entering or accessing client data in MFIN.

PROCEDURE:

Agencies who wish to have a new user trained must contact the MFIN Administrator to schedule training. We will work to schedule training as quickly as possible, but we will always attempt to schedule a group of users to keep training and travel costs down.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	401.1
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AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - HUD HMIS Security Standards (§580.7)
User Administration - End Users Prerequisites

POLICY:

All end users are required to have a minimum set of basic computer skills to adequately perform their data entry roles in Mid Florida Information Network (MFIN).

PROCEDURE:

Users will be evaluated for competency during the beginning of the training. Users that are determined to not meet the competency requirements will be invited to remain and observe the class. The Point of Contact will be contacted after the class. Classes to improve computer proficiency can be found at a local library, community center, college, etc.

Basic computer competency includes: use a mouse to point, click and double-click; use a keyboard; open and close software files; locating a saved file; copy and paste text; access the internet via browser; enter a URL; scroll through web page; move smoothly through data entry fields using tab buttons, arrow buttons and/or mouse.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	402
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Last Reviewed:	8/12/2019	Last Updated:	8/25/2017

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - HUD HMIS Security Standards (§580.7)
User Administration – User Training

POLICY:

Mid Florida Information Network (MFIN) provides the following training opportunities for its end users.

- Privacy & Client Consent Policy & Procedure –training focuses on clients’ rights and privacy, and data security in MFIN.
- Standard Operating Procedures – training focuses on requirements of data entry based on state/federal funding, definitions relating to homelessness, data requirements of MFIN, etc.
- Basic HMIS Software & Data Entry –training focuses on the software: how to add clients, enroll into programs and services, discharging clients, etc.
- Referral Training – training will focus on the procedures to refer a client to another MFIN agency via HMIS software.
- Intermediate / Advanced HMIS software – training will focus on basic Microsoft Excel (entering data, inserting/deleting columns and cells, formatting cells, calculating sums,

sorting data; training also focuses on the reports in HMIS, how to run, export, and use reports.

- System Administrator Training for MFIN staff
- Periodic User Training
- Annual Security Training – training will focus on maintaining security of client data
- Grant reports and budget projection spreadsheet – training will focus on how to utilize Excel to plan services to be provided in order to fully expend a grant budget, as well as how to use MFIN reports to complete monthly grant reports.

PROCEDURE:

Agencies who wish to have a new user trained must contact the MFIN administrator to schedule training. MFIN Administrator will attempt to schedule training at locations and times to best serve multiple new users.

Training times for new user classes typically are: morning classes will run from 8:30am – 12pm, and afternoon classes will run from 1pm – 4:30pm.

Training for areas other than new user classes will be scheduled on an as-needed basis.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	403
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Last Reviewed:	8/12/2019	Last Updated:	8/25/2017

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - HUD HMIS Security Standards (§580.7)
User Administration – Usernames

POLICY:

End Users must be provided a licensed username and provided training through Mid Florida Information Network (MFIN) prior to entering or accessing client data in MFIN.

PROCEDURE:

Upon approval of a new user, MFIN Administrator will create a username and provide log-on information to the user during the New User Training. Multiple users utilizing the same username is prohibited except under certain circumstances and with prior knowledge and permission from the HMIS Administrator. As always, any new users who would be using this shared username will be required to attend new user training provided by HMIS staff, and all subsequent required training, including annual security training.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	403.1
Date Approved:	01/24/2014	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	8/23/2019

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - HUD HMIS Security Standards (§580.7)
User Administration – User License Administration

POLICY:

Notification of issuance and revocation of access within the Mid Florida Information Network (MFIN) is the responsibility of the Member Agency Administrator.

PROCEDURE:

The Member Agency administrators are responsible for notifying MFIN staff of a new user, change in user access, or deletion of user access within 24 hours of the needed change to MFIN access.

MFIN staff will assign the security level of every end user based on the agreed upon security settings established by the Member Agency at the initial MFIN Site Visit. Users should be assigned the lowest level of security needed to perform their normal work duties.

Users must log in to the live HMIS within 5 days of initial training, and allow no more than 60 days between login sessions to keep their username active. Failure to do so will result in a user having their login access deactivated by MFIN staff or automatically by the MFIN system, and the user will be required to attend re-training prior to regaining access.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department: Mid Florida Information Network (HMIS) **Policy #** **403.2**

Date Approved: 01/24/2014 **Author:** **MFIN Committee**

Last Reviewed: 8/12/2019 **Last Updated:**

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 HMIS - HUD HMIS Security Standards (§580.7)
User Administration – MFIN Removal of User for Cause

POLICY:

Mid Florida Information Network (MFIN) reserves the right to immediately inactivate or delete the username of any end user for cause.

PROCEDURE:

In all cases where a username is removed for cause, the assigned MFIN member agency administrator and Executive Director will be notified immediately via email with the stated cause of user removal.

Reasons that a user would be removed or otherwise have their access temporarily inactivated or revoked would include, but not be limited to:

- Multiple failed log on attempts in the same day (this is an automatic process where the system locks the user after 3 failed attempts; username is automatically unlocked after 2 hours)
- A consistent lack of good data quality
- Failure to log on to system at least once in a consecutive 60-day period
- Sharing system credentials (username and password) with any other party
- Violation of client privacy or security



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	501
Date Approved:	02/22/2013	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	1/24/2014

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Security Standards (§580.35)
Security Plan – Security Plan

POLICY:

As per HUD HMIS Security Standards (§580.35) the Homeless Management Information System (HMIS) Lead, Mid Florida Homeless Coalition, must establish a security plan (approved by the Continuum of Care), designate a Security Officer, conduct workforce security screenings, report security incidents, establish a disaster plan, establish physical and technical safeguards, and conduct an annual security review. These policies are documented in 501.1 through 501.6.

PROCEDURE:

The Security Officer of the Mid Florida Information Network (MFIN), the name of this CoC's homeless management information system, is hereby designated to be Mid Florida Homeless Coalition's MFIN Administrator.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	501.1
Date Approved:	02/22/2013	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	1/24/2014

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Security Standards (§580.35)
Security Plan – Workforce Security

POLICY:

As per HUD Homeless Management Information System (HMIS) Security Standards (§580.35) and as established by FL 520 – Citrus, Hernando, Lake and Sumter CoC, every Covered Homeless Organization (CHO):

1. must designate an HMIS security officer to be responsible for ensuring compliance with applicable security standards;
2. must conduct criminal background checks on Security Officer and all Administrative level users.

Definition: Covered Homeless Organization (CHO) - Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes data on homeless clients for an HMIS.

PROCEDURE:

The Mid Florida Information Network (MFIN) requires the HMIS Security Officer to pass a background check.

The Florida Legislature has passed a law, effective 8/1/10, that places new requirements on persons who work with vulnerable populations (children, elderly, and the disabled). This law, part of 2011 Florida Statute XXXI, Section 435 regarding labor background changes, has been adopted by the Department of Children and Families, Agency for Health Care Administration (AHCA), Department of Elder Affairs, and the Florida Department of Law Enforcement.

This law requires that employees and volunteers who work with vulnerable populations undergo and pass a background check.

All participating agencies are required to ensure they are in compliance with this law. The Member Agency Agreement will attest to this.

In order to secure the shared client data in MFIN, we encourage each organization to follow this law for all users who have access to MFIN data.

See Form 501-A – Designation of Security Officer



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	501.2
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AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Security Standards (§580.35)
Security Plan – Security Training

POLICY:

The MFIN Administrator, also known as the MFIN Security Officer:

1. will ensure that all users receive security training prior to being given user access to HMIS;
2. will provide required security training at least annually for all users, and that the training curriculum reflects the policies of the Continuum of Care and the requirements as per DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT 24 CFR Parts 91, 576, 580, and 583 [Docket No. FR-5475-P-01] Homeless Management Information Systems Requirements.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	501.3
Date Approved:	02/22/2013	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	6/26/2015

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Security Standards (§580.35)
Security Plan – Reporting Security Incidents

POLICY:

All Covered Homeless Organizations (CHOs) are obligated to report, within 24 hours, suspected instances of noncompliance with policies and procedures that may leave MFIN data vulnerable to intrusion. Each is responsible for reporting any security incidents involving the real or potential intrusion of the Mid Florida Information Network to the MFIN Administrator at Mid Florida Homeless Coalition.

PROCEDURE:

MFIN users must report to their agency's Security Officer any incident in which unauthorized use or disclosure of Personally Identifiable Information (PII) has occurred and any incident in which PII may have been used in a manner inconsistent with the MFIN Security Plan. Security breaches that have the possibility to impact the Mid Florida Information Network must be reported to the MFIN Administrator. The agency Security Office must Contact the MFIN Administrator via email at mfhc02@gmail.com. Provide all pertinent information related to the breach of security.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	501.4
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Last Reviewed:	8/12/2019	Last Updated:	1/24/2014

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Security Standards (§580.35)
Security Plan – Disaster Plan

POLICY:

Bitfocus, Inc., owners of Clarity Human Services, provides disaster protection and recovery by copying data on a regular basis to another medium and to a secure off-site location. Data is stored in a central server that is in a secure room with appropriate temperature control and fire suppression systems. Surge protectors are used on all servers used to collect and store data. Disaster Recovery exercises are carried out twice per year.

Back-ups of the MFIN Database is conducted every night at midnight and includes all program configuration information, application configuration, and databases.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	501.5
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Last Reviewed:	8/12/2019	Last Updated:	1/24/2014

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Security Standards (§580.35)
Security Plan – Physical Safeguards

POLICY:

As per HUD Homeless Management Information System (HMIS) Security Standards (§580.35) and as established by FL 520 – Citrus, Hernando, Lake and Sumter CoC, every Covered Homeless Organization (CHO):

1. Should have a policy defining the confidential storage of paper records containing personally identifiable information (PII);
2. Should have a policy defining the length of time records containing PII and other information relating to MFIN are retained; policy should consider funded program requirements;
3. Should have a policy defining destruction of hardcopy and digital records containing PII.

Definition: Covered Homeless Organization (CHO) - Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes data on homeless clients for an HMIS.

Form 206-A MFIN Compliance Checklist



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	501.6
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Last Reviewed:	8/12/2019	Last Updated:	1/24/2014

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Technical Standards (§580.33)
Security Plan – Technical Safeguards

POLICY:

To protect and control access to protected electronic MFIN information:

1. Agency users must not share usernames and passwords, nor store usernames and passwords in public locations.
2. Computers and other internet accessible devices such as notepads and cell phones accessing the MFIN should be password protected, and screensavers should have an automatic timeout requiring a password.
3. Digital media should be appropriately wiped or reformatted as indicated by the type of media.
4. Computer hardware must have virus protection in place with auto-update turned on; virus protection should be updated annually.
5. Firewalls are recommended to protect the MFIN from outside intrusion.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	601
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AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Data Quality Standards (§580.37)
Data Quality Plan – Data Quality Plan

POLICY:

Data Quality Standards and Benchmarks for the FL-520-Citrus, Lake, Hernando, & Sumter CoC are as follows:

- Bed Coverage Rates – the CoC strives for 100% bed coverage each year, meaning all shelters in the geographic area except domestic violence shelters are entering data into the MFIN.
- Bed Utilization or Occupancy Rates – CHOs are to strive for a utilization rate of 65% and higher (the minimum rates required for the Annual Homeless Assessment Report)
- Service-Volume Coverage Rates – this rate applies to HUD projects without overnight accommodations (homelessness prevention projects or street outreach projects) and will be obtained by dividing the number of persons served annually by the projects that participate in the HMIS by the number of persons served annually by all of the Continuum of Care projects within the HUD-defined category.

- Universal Data Elements
 - Facilities and local, state or federally funded programs requiring entry into HMIS - users MUST answer the following data element questions: Name, SSN, DOB, Race, Ethnicity, Gender, Veteran Status, Disabling Condition, Project Start Date, Project Exit Date, Destination, and Relationship to Head of Household, Client Location, Housing Move-In Date, and Living Situation. (*Client Location is automatically completed by system.*)
 - Prevention Services – it is recommended that agencies providing rental and utility assistance that are not state or federally grant-funded should collect the same Universal Data Elements as the Facilities and other grant-funded programs requiring entry into HMIS.
 - Other Services Only & Food Programs – for services not provided under local, state and federal program that are not financial in nature, the MFHC RECOMMENDS agencies answer Name, SSN, DOB, Gender, Race, Ethnicity, Veteran Status, as well as Living Situation, Employment Status, Income Status, and Disabling Condition.
- Missing/Don't Know/Refused Data –
 - Facilities and local, state or federally funded programs (street outreach, rapid rehousing, homeless prevention) should strive for less than 3% missing / don't know / refused data on universal data elements;
 - Services Only and Food Pantries should strive for 20% or less missing / don't know / refused data on universal data elements.

PROCEDURE:

It is expected that all member agencies entering data into the MFIN will work with clients to collect and enter all necessary data.

Data quality will be evaluated on a monthly basis, and if needed, the MFIN Administrator will contact necessary agencies to correct or complete data. Agencies must respond to requests within 5 business days.

Performance cards are prepared by MFIN Admin staff for those federal or state funded programs and shared with the Performance Measures Committee, and include, but are not limited to, Performance as measured by the System Performance Measures report, Average cost per household, Utilization rates, Timeliness of data entry and Data Quality for all Universal Data Elements (UDE).



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	601.1
Date Approved:	01/24/2014	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	9/26/2014

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Data Quality Standards (§580.37)
Data Quality Plan – Data Entry Timeliness

POLICY:

Data entry must be done in a timely manner. Agencies providing shelter will input entry and exit data on a client within 5 days of activity. Agencies providing services only will input entry and exit data on a client within 30 days of activity.

Agencies receiving state or federal grants requiring Homeless Management Information System data entry will input entry and exit data, as well as services provided for a client within 5 days of activity.

PROCEDURE:

MFIN Administrator will run and forward data quality reports to Agency Administrators that show users' data entry timeliness.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	601.2
Date Approved:	01/24/2014	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	06/26/2015

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Data Quality Standards (§580.37)
Data Quality Plan – Data Quality Revision

POLICY:

Data Quality is reviewed by Mid Florida Information Network (MFIN) staff on at least a monthly basis. Member Agency administrators will be contacted about Missing data, and Refused or Don't Know answers, as well as data that is conflicting.

PROCEDURE:

MFIN Administrator will provide data quality reports showing the missing and/or conflicting data, and request the client's files be checked for the correct information, or ask that the client be re-interviewed to gather the correct information.

Users will need to make the corrections in the HMIS data record within 5 business days of notification.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	601.3
Date Approved:	02/22/2013	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	8/25/2017

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Data Quality Standards (§580.37)
Data Quality Plan – Utilization Report

POLICY:

Shelter utilization rates will be reported to the Continuum of Care (CoC) on a quarterly basis.

PROCEDURE:

The Utilization Report will be prepared each quarter. Agencies should ensure all data is up-to-date in order for the utilization rates to be accurate.

A report consisting of each individual shelter's utilization rates (# of nights available for use, # of nights used, percentage rate of usage, and number of individuals served) for the previous quarter and last 12 months, of all shelters will be created and shared with the CoC and published on the CoC's website.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	601.4
Date Approved:	01/24/2014	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	1/24/2014

AUTHORITY:

Bitfocus, Inc. (HMIS vendor)
Data Quality Plan – Reporting Errors in Clarity Reports

POLICY:

Mid Florida Homeless Coalition's HMIS vendor, Clarity, has specific documentation requirements in order reproduce the issue and resolve it in a more timely manner.

PROCEDURE:

Users reporting issues with the Reports feature of Clarity should provide the following information to the MFIN Administrator:

1. Full name of the report (i.e. - [HUDX-101] Annual Performance Report [APR])
2. What parameters did you use? - (please include everything: start date, end date, programs or services selected, etc.)
3. Describe in detail what happened, or maybe what should have happened but didn't.
4. Did you check your data to see if maybe you had an error?
5. What is the importance of the report: Low, Medium, High
6. If possible forward a screen shot of the error message (click the key "print screen" or "prt sc" on your keyboard, then "paste" the image into your email).



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	602
Date Approved:	02/22/2013	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	10/28/2016

AUTHORITY:

Mid Florida Homeless Coalition, Inc. – Lead Agency
Data Quality Plan – Grant Contracts

POLICY:

All organizations that are required to use HMIS as the reporting database for a State or Federal grant, must provide a copy of all grant contracts, or award notification letters, within ten days of being fully executed. These contracts will be used MFIN Administrator to set up needed reports, and will provide needed guidelines to be used to assure correct data is being collected and entered.

PROCEDURE:

Upon receipt of your fully executed contract, forward a copy, via email if possible.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	602.1
Date Approved:	02/22/2013	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	??

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Data Quality Standards (§580.37)
Data Quality Plan – Federal Grantees and Sub-Grantees of MFHC

POLICY:

Contracts with the Department of Housing and Urban Development (HUD) will be reviewed by the Mid Florida Information Network (MFIN) staff to determine what data must be collected and reported. Beginning in 2016, all State of Florida funding is granted to the Lead Agency, Mid Florida Homeless Coalition, and then sub-granted to various Member agencies.

PROCEDURE:

MFIN staff will advise Member Agencies with any changes necessary in data collection or data entry based on their contracts with HUD.

Sub-grantees will be required to attend a pre-grant meeting and/or training where they will be provided all data collection requirements.

MFIN staff will review collected data on a monthly basis, advising Member Agency administrator of any missing or conflicting data in a timely manner, allowing agency a chance to correct the data prior to monthly, quarterly or annual reports being pulled from the HMIS database. Per Policy 601.1, data relating to state and federal grants requiring entry into the MFIN must be entered within 5 days of occurrence.

The Annual Performance Report (APR) for the HUD Homeless Assistance Grants that are submitted to the granting agency must be copied to MFIN staff (via email is the preferred method). Monthly, quarterly and final ESG CAPER reports for the Emergency Solutions Grants will be run by MFIN staff and submitted to the the granting agency. Agencies receiving Emergency Solutions Grants are encouraged to run the ESG CAPER reports themselves to review their data for any inconsistencies.

The MFHC Performance Measurement Committee will review the quarterly/final Performance cards prepared by MFIN Administrative staff. The HUD CoC Program recipient agencies will be asked to present their APR during a regular Continuum of Care meeting held following the APR's submission. These reports provide information on data quality, as well as outcomes for stable housing, income, and earned income measures.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	602.3
Date Approved:	01/24/2014	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	06/26/2015

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Data Quality Standards (§580.37)
Data Quality Plan – Annual Point in Time Count (PIT) and Housing Inventory Count (HIC)

POLICY:

The Continuum of Care (CoC) must report, on an annual basis, information pertaining to all persons who are homeless on one day during the last 10 days in January. Every year, all sheltered literally homeless individuals and those who are literally homeless without shelter must be counted and reported to both HUD and the State of Florida. On alternating years (even years), the report to the State of Florida may also include those individuals who are homeless but living in a doubled-up situation such as with family or friends based on the requirements of the State.

On that same day in January, the CoC must also report for each facility, using the Housing Inventory Count (HIC), the number of beds and units available for individuals and families with children who are homeless throughout our communities.

PROCEDURE:

The CoC will determine on which of the last 10 days of January the count will occur. Mid Florida Information Network (MFIN) will utilize HMIS for the sheltered count, and plans will be made for street counts of the literally homeless in each of our communities, utilizing volunteers from the Member Agencies and other agencies serving those in need.

Representatives of each school system within the CoC will report the number of homeless students, and these will be added to the sheltered and street counts.

All Member Agencies who enter data for facilities must have their data entry completed within 5 days of the date of the count. The MFIN Administrator will review the data, and if necessary contact each Member Agency with any questions regarding missing or conflicting data. If necessary, based on the State's requirements, Member Agencies may need to complete a Shelter Assessment for each individual containing any additional questions required by the State.

The MFIN Administrator will complete the Point-in-Time report on HUD's Data Exchange website, and the Executive Director will submit the report.

During the month of February, the MFIN Administrator will visit each shelter to certify the number of year-round beds, the number of overflow beds, and the number of seasonal beds. The number of beds will be based on Member Agency input, as well as a review of past usage.

It is important that each shelter accurately report the number of year round use beds as the Housing Inventory Count results will be utilized as part of the Longitudinal Systems Analysis Report to determine the utilization rate for each shelter.



STANDARD OPERATING PROCEDURE/POLICY

Mid Florida Homeless Coalition

Department:	Mid Florida Information Network (HMIS)	Policy #	701
Date Approved:	01/24/2014	Author:	MFIN Committee
Last Reviewed:	8/12/2019	Last Updated:	10/28/2016

AUTHORITY:

24 CFR Parts 91, 576, 580, and 583 – HUD HMIS Data Quality Standards (§580.37)
Privacy Plan – Privacy Plan

POLICY:

This Plan describes the privacy policy and practices of Mid Florida Information Network (MFIN). MFIN is administered by the Mid Florida Homeless Coalition (MFHC). The MFHC can be contacted by mail at P.O. Box 3031, Inverness, FL 34451-3031 or by phone at (352) 860-2308/

This Plan covers the processing of protected personal information for clients of all participating agencies of the Mid Florida Information Network.

Protected Personal Information (PPI) is any information we maintain about a client that:

- a) Allows identification of an individual directly or indirectly
- b) Can be manipulated by a reasonably foreseeable method to identify a specific individual
or

- c) Can be linked with other available information to identify a specific client. When these policies refer to personal information, they mean PPI.

This Plan was adopted by the MFIN because of standards for Homeless Management Information Systems (HMIS) issued by the Department of Housing and Urban Development (HUD). It is the intent of MFIN for our policies and practices to be consistent with these standards. See Federal Register Vol 77, No 147 (July 31, 2012).

This Plan pertains to Client Privacy and Agency Practices available in a Privacy Notice for Mid Florida Information Network (MFIN). The MFIN may amend this notice and change the policy or practices at any time. Amendments may affect personal information that is obtained before the effective date of the amendment.

A written copy of this privacy notice is provided to any individual who asks. A sign is posted at intake desks or other locations visible to clients explaining the reasons personal information is requested. The sign says:

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 for homeless individuals, and to better understand the need of homeless individuals. We only collect information that we consider to be appropriate.

The sign also includes all current and active members of the Mid Florida Information Network (MFIN).

PROCEDURE:

The Privacy Notice for Mid Florida Information Network (MFIN) Full Notice and the Brief Notice sign are provided to each user in MFIN. Users must receive, read, and follow in order to receive a user name and password. Each user must sign a receipt acknowledging this intent.

The MFIN Administrator will, as needed, provide, via email, updated Brief Notices as agencies are added or removed.