

# **Westchester County Continuum of Care Partnership for the Homeless HMIS Data Quality Plan**

## **PURPOSE**

This document describes the Homeless Management Information System (HMIS) Data Quality Plan for the Westchester County Continuum of Care Partnership for the Homeless (CoC). The plan includes assurances and controls to maintain high data quality that meet requirements set forth by the U.S. Department of Housing and Urban Development (HUD) for HMIS projects. The plan in no way precludes or supersedes an HMIS partner agency's reporting obligations to any given funder or third party. The Westchester County Department of Social Services (DSS) in its capacity as the HMIS Lead Agency has developed the plan, in consultation with the CoC Data and Systems Committee. The plan is to be updated annually, considering the latest HMIS data standards and CoC performance objectives.

## **BACKGROUND**

An HMIS is a locally administered, electronic data collection system that stores longitudinal person-level information about the men, women and children who access homeless and other human services in a community. Each CoC receiving HUD funding is required to implement an HMIS to capture standardized data about all persons accessing the homeless assistance system. Furthermore, elements of HUD's annual CoC funding competition are directly related to a CoC's progress in implementing its HMIS. In 2004, HUD published HMIS Data and Technical Standards in the Federal Register. The Standards defined the requirements for data collection, privacy safeguards and security controls for all local HMIS. In March 2010, HUD published changes in the HMIS Data Standards Revised Notice. Additional Data Standards are currently under revision.

## **DATA QUALITY PLAN**

Data quality is a term that refers to the degree to which a project satisfies requirements related to data. A data quality plan defines these requirements, assures activities exist to prevent errors and establishes standard procedures to control quality. As a result, a data quality plan can better position the CoC to achieve strategic objectives.

This plan specifies requirements for relevant, measurable attributes utilized to assess data quality: timeliness, completeness, accuracy and consistency.

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## Timeliness

### Quality Assurance

Data entered in a timely manner can reduce human error that occurs when too much time has elapsed between the data collection, or transaction, and the data entry. The individual doing the data entry may be relying on handwritten notes or their own recall of a case management session, a transaction or a program exit date; therefore, the sooner the data is entered, the better chance the data will be correct. Timely data entry also ensures that the data is accessible when it is needed, either proactively (e.g. monitoring purposes, increasing awareness, meeting funder requirements), or reactively (e.g. responding to requests for information, responding to inaccurate information).

### Requirements:

- **Emergency Shelter:** Universal Data Elements and Housing Check-In/Check-Out are entered within 1 business day; any required Assessments entered within 3 business days of enrollment.
- **Transitional and Permanent Supportive Housing:** Universal Data Elements, Assessments, and Housing Check-In/Check-Out are entered within 3 business days of enrollment.
- **Homelessness Prevention and Rapid Re-Housing:** Universal Data Elements and Assessments are entered within 1 business day of enrollment.
- **Outreach:** Personally identifiable information (PII) entered within 3 business days of initial engagement; Universal Data Elements and Assessments entered within 5 business days of enrollment.
- **Supportive Services Only:** Universal Data Elements and Assessments entered within 5 business of enrollment.

### Quality Control

DSS, or authorized agents, will assess timeliness by running monthly reports for each partner agency. When DSS finds average timeliness fails to satisfy requirements, it will notify the agency's HMIS site administrator to provide an explanation and implement a plan for corrective action as needed.

## Completeness

### Quality Assurance

Missing data can negatively affect the ability to provide comprehensive care to clients, including eligibility determination; therefore, all partner agencies agree, upon HMIS implementation, to adopt and enforce intake and assessment procedures that align with HMIS data collection requirements to prevent

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incomplete data collection. All programs that use HMIS must enter data on one hundred percent (100%) of clients served.

While “client doesn’t know or doesn’t have” and “client refused to answer” are eligible responses to individual client intake and assessment questions, the CoC defines acceptable rates for these total “unknown” responses at the program level based on data element and program type considerations.

### Standard Mean and Upper Limit for Unknown Responses

	Outreach	ES, Non-HUD SSO	TH, PSH, HUD SSO, HP, RRH
<b>First &amp; Last Name</b>	0%	0%	0%
<b>Social Security Number</b>	10% (+5%)	10% (+5%)	6% (+3%)
<b>Date of Birth</b>	0% (+2%)	0% (+2%)	0% (+2%)
<b>Race</b>	2% (+3%)	2% (+3%)	0% (+2%)
<b>Ethnicity</b>	2% (+3%)	2% (+3%)	0% (+2%)
<b>Gender</b>	0% (+2%)	0% (+2%)	0% (+2%)
<b>Veteran Status (Adults only)</b>	2% (+3%)	2% (+3%)	0% (+2%)
<b>Disabling Condition (Adults only)</b>	2% (+3%)	2% (+3%)	0% (+2%)
<b>Residence Prior to Program Entry</b>	0% (+2%)	0% (+2%)	0% (+2%)
<b>Length of Stay</b>	4% (+2%)	4% (+2%)	4% (+2%)
<b>ZIP Code of Last Permanent Residence</b>	10% (+5%)	20% (+10%)	10% (+5%)
<b>Housing Status (At program entry)</b>	0% (+2%)	0% (+2%)	0% (+2%)
<b>Housing Status (At program exit)</b>	0% (+2%)	15% (+10%)	0% (+2%)
<b>Income &amp; Benefits (At program entry)</b>	0% (+2%)	2% (+3%)	0% (+2%)
<b>Income &amp; Benefits (At program exit)</b>	0% (+2%)	15% (+10%)	0% (+2%)
<b>Other Program Data Elements</b>	5% (+5%)	5% (+5%)	0% (+2%)
<b>Destination at Exit</b>	15% (+10%)	15% (+10%)	0% (+2%)

### Quality Control

DSS, or its authorized agents, will assess completeness by running quarterly reports each partner agency. When DSS finds average completeness fails to satisfy requirements, it will notify the agency’s HMIS site administrator to provide an explanation and implement a plan for corrective action as needed.

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## **Accuracy**

### Quality Assurance

All data entered into the CoC's HMIS shall be a reflection of information provided by the client, as documented by the data collector or otherwise updated by the client and documented for reference. Recording inaccurate information is strictly prohibited, except in cases when a client refuses to provide correct personally identifiable information.

Partner agencies will make their best effort to record accurate data by implementing appropriate policies and procedures. Inaccurate data is only acceptable when a client refuses to provide his or her personally identifiable information, as well as that of dependents, and the program, in accordance with all other requirements, does not prohibit it. In these cases, it is permissible for the partner agency to enter client data under an alias that will not be made visible or accessible to any other agency. The partner agency is responsible for any internal duplication of services as a result of inaccurate data. If accurate information is later obtained, then the partner agency should correct the client data in a timely manner; upon correction and provision of client consent to release information, the client data may be shared with agencies in HMIS.

### Quality Control

DSS, or its authorized agents, will request that partner agencies certify accuracy at least annually. Reports will exclude data on outreach contacts not yet enrolled in a program. If the partner agency is unable to certify accuracy, DSS will review source documentation based on random sampling. The partner agency is responsible for providing any and all documentation for the purposes of the review. In consultation with DSS, the partner agency will implement a plan for corrective action based upon the findings.

## **Consistency**

### Quality Assurance

Consistency refers to the standard and uniform practice for implementation, data collection and data entry across all programs in the HMIS. Inconsistency hinders an agency's ability to satisfy requirements as they relate to timeliness, completeness and accuracy. To assure quality, all prospective partner agencies will implement HMIS in consultation with DSS, providing access to program assets (e.g. intake and assessment forms, eligibility requirements) and complying with DSS's recommendations consistent with best practice. DSS may delay or cancel implementation if the agency does not faithfully participate in the process. Upon implementation, all HMIS users shall complete training before they may access the system.

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## Quality Control

DSS, or its authorized agents, will assess consistency by running a monthly report to identify instances of duplicated client records. To resolve duplication, DSS may request additional information to properly identify clients with incomplete data and rule out any false positives. If duplication persists, the user in question must participate in additional training.

If, after implementation, the partner agency wishes to use HMIS for other programs or make adjustments to current program configurations, the agency's HMIS site administrator must submit a written or electronic change request to DSS. DSS shall review, request additional information and decide upon any requests consistent with best practice.

## **COMPLIANCE, ENFORCEMENT AND INCENTIVES**

If the partner agency repeatedly fails to satisfy data quality requirements and implement corrective action, DSS may find the agency in violation of the terms and conditions for HMIS participation, which would result in the immediate termination of all contractual obligations under the HMIS Agency Partner Agreement. Upon contract termination, DSS will immediately revoke HMIS access and deactivate any and all user accounts.

Failure to comply with these terms and conditions may also culminate in loss of project funding for those agencies with HMIS participation requirements.

The agency may appeal to the CoC Data and Systems Committee to reinstate its HMIS contract and resume participation. Any decision by the committee is final.

If the appeal to reinstate is denied, the agency will be eligible to reapply after one year of termination.

If the appeal to reinstate is granted, the committee will recommend corrective action to either or both partner agency and DSS to assure future compliance with the data quality plan.

To incentivize compliance with the plan, DSS may choose to publically recognize achievement in the area of data quality.