**Three County Coc Data Evaluation Committee**

**4/25/22**

**Present: Cynthia DiGeronimo, Betty Hakes, Michele LaFleur, Kathy Keeser, Owen Wallace, Laura Hudson, Amanda Sawyer**

**Working through HMIS sharing settings issue- where are we?**

*Paragraph pulled from previous notes for context***-** The new HMIS data sharing issue continues to be a problem for many providers. To recap, our data from multiple closed systems was merged in a data warehouse and then migrated to our new HMIS which is also a closed system. Because the client records were imported merged, the first agency which worked with the client is the only agency which can access or even view the client record, even though other agencies may be currently working with the client and need to be able to access their record.

This committee met with our HMIS TA provider assigned by HUD, Eric Gammons, and our HMIS vendor Bitfocus on 3/31 and talked through all of the options recommended by Bitfocus. The options were:

### **Adjust Default sharing group from Clients Created Not Shared to Clients Created Full Shared for all agencies** – opening up data sharing across most or all agencies and making client records private for a specific agency as needed, merging duplicate client records after data has been shared.

### **Duplicate client profiles from one into multiple for each agency that has information associated with the profile** – creating duplicate records for each client record currently being used by multiple agencies so all can access the client, keeping sharing settings closed and agencies creating new client profiles for each new client going forward.

### **Adjust Default sharing group from Clients Created Not Shared to Clients Created Full Shared for all agencies AND adjust provider workflows for new record creation** – opening up data sharing across most or all agencies and making client records that are only needed at one agency ‘private’ to that agency, while setting all future client records as private unless the client record needs to be shared with another agency (with agreement)

After this discussion there was agreement to open up data sharing in a phased and cautious way, and this committee meeting was our first meeting to try and advance that process of making sure we are prepared for opening up data sharing.

Sounds like opening sharing will work for most programs but some will need another separate agency- mostly ServiceNet for family shelters because the data needs to be kept hidden even from other ServiceNet staff. We can't open ServiceNet sharing until that’s sorted out and many client profiles will remain hidden from other agencies until ServiceNet data is shared. We are currently in the process of trying to figure out how to set up a separate family shelter agency and ensure we can pull data there and use it for reporting without making it accessible anywhere else.

**What do we need to do?**

We briefly discussed some key items we know we’ll need to create or edit: our release of information, our HMIS agreements, our HMIS privacy and security plan/policies, the data collection notice posting

Owen- may want to add notice that is displayed for a client to see, add something that explains or expands on the language, something that encapsulates these changes that would help them better understand. By having it posted, they don’t have to request it. Many won’t look at it, but for those who do, it’s posted right there, don’t need to know that they can request it because it’s already visible. Make sure it’s in line with what the new release is saying.

Cynthia- does that provide a link to the actual document? That could be helpful to access there

Owen- probably won’t be typing links into their phone but could add a QR code on the posting

Kathy- could do those but lots of our folks have not-smart cell phones and can’t read those. Would be great but a lot would not be able to.

Owen- Yeah, we could provide a link that can be typed in as well as that. Some phones can but are 1-200 dollars depending on what kind of phone they are, can load a month of minutes and data and get some technologically stabilized

Consensus was that the documents above need to be at least reviewed and likely altered, and the data collection notice needs to be made available as a comprehensive standardized document from the CoC, currently we have a very barebones HUD version available from years ago and a more fleshed out data collection notice could help provide some important information around the change as well as the release and data collection practices in general.

**Changes to release of information- worked on edits**

We begun taking a look at the current release of information and thinking through potential edits and changes to it’s structure.

Laura brought up a good question- ‘Access’ to data is available for other agencies, not necessarily ‘sharing’, this language could help clarify that someone’s data isn’t necessarily being sent out to other agencies, but that if another agency were to search in HMIS they could potentially see the data. It will be important to clarify the difference and most likely use cases.

Amanda- how does this form come into play, and if it becomes a required form for the purposes of auditing. The agency, for the purpose of obtaining information from other providers, we collect data from many agencies and already uses releases with them. In this case we’re just talking about basic demographic information and if someone participated somewhere. We don’t have to necessarily have to have a ROI if trying to obtain treatment for someone, just if sharing or obtaining data, how is it used?

There’s a state release of information coming as well the state developed a statewide data warehouse so they can do reporting on the state as a whole and try to help providers obtain chronic homelessness history from providers within other CoCs for clients who move across CoCs. The idea is that each client will be asked to sign a release of information selecting which CoCs they are okay sharing their history with. Then hen a provider from one of those CoCs generates a homelessness history verification from the warehouse, it will include history from all of the CoCs the client has identified they are okay sharing with. (Michele- I think... it hasn’t been our focus with our own HMIS implementation to get in place but we will revisit after things are more stable, it’s just good to be aware there’s going to be another release of information for clients to think about!)

Amanda- it's getting confusing which release is which, there are so many, from a language and clarity standpoint we need to find a way to define which is which.

Maybe there’s another name that should be included instead of a release of information? We can work on a new name for this document in future meetings but will refer to it as the CoC’s release of information for the time being.

Is this required by HUD? No! We don’t need a release of information and HUD wishes we didn’t use one. Data collection should happen no matter what, someone always has the option to deny sharing certain information if they wish and the only repercussions should be data quality for the program and the person may not be able to withhold information necessary for entry into a program and still receive those services. No one should be denied shelter access for declining to share information.

Currently we have a ‘release of information’ document that tells others we collect and share information and the reasons why and who it’s shared with. It’s called a release of information but it’s primarily to ask for permission to enter their data in HMIS (which we shouldn’t be asking for) and to ask if we can share their information with other providers for coordination of care in coordinated entry. Eric recommended that if we are moving towards open data sharing, we move this document away from a request to collect and report data to funders and towards a request to share data with other providers in the HMIS, or to ‘make available’ (we need to do some wordsmithing still)

Cynthia- for development of changes, it could be good to identify the data points that would be visible if a record is marked private

Yes! I don’t think there should be anything visible outside of the agency but we can do more testing and at least write out an explanation of this option and make it available.

Cynthia- this should be the HMIS release of information as a starting point, without the request for authorization from the first paragraph

Do we want this to remain as a document that is about reporting to funders or move towards that being a given and just requesting making data available to other providers?

Laura- in general, the reporting to funders is only shared in summary and aggregate, not in details. Within this it says we also use data to share among providers for services. Could take out the reporting to funders because in reality we’re not sharing their personal information in our reports to funders. Whether someone is private or coded, doesn’t matter for reporting to funders. Doesn’t mention case conferencing, I think the fact that we have meetings where we talk about people, it seems that it should be more clear about the coordinated entry piece. Think most sharing between providers happens in those case conferencing meetings.

Yes, that’s a good point that we aren’t really ever sharing someone’s personal information or details to our funders, they only want aggregate numbers and not any individual personal data, sharing on an identifiable level is more about different providers trying to provide the best care for a household.

Cynthia- seems those case conferencing meetings go beyond the data even, the goal is to help people by case workers sharing perspective of what would be helpful and what’s a good match beyond what the data shows.

Kathy- doing those meetings for years, don’t think you can capture everything that happens in those in a statement. Talking to someone verbally, we explain it and that will bring up case information in order to get housing. Sometimes getting best wording and getting it simple is the best option. Other sharing doesn’t happen often outside of case conferencing.

Explaining the release and what case conferencing consists of will continue to be very important for any version we create!

Amanda- The statement next to the anonymous coordinated entry box says not sharing will be harder to gain access to housing and sharing will get access faster, is that something we want to say?

Kathy- if they don’t agree to share, it’s hard to be part of case conferencing. I think they are more likely to get access to housing by sharing their information.

Laura- it is true that not sharing data can make it harder to get access to housing but I think that saying you are more likely to get housed faster if you share information is a little bit of coercion that we want to avoid.

Kathy- Most people are comfortable with sharing and understand it, can take the sentence out and just say it to people because that is the reality.

Amanda- 100% agree, it’s about building relationships and having conversations, looks a little discriminatory/coercive to put it in writing like this, makes it feel like there’s a consequence and a red flag.

Laura- you leave yourself open to someone trying to sue based on ‘you didn’t house me because I didn’t sign this’ I can never talk about clients in case conferencing but CoC does a good job of talking in advance and speak one on one so that they weren’t outed in case conferencing. Have always been hampered by the fact that we hold peoples identity very privately.

Michele- can remove this statement from the document but want to include in training still, so staff can have conversations with participants about the reality of each situation.

Owen- this gets at the need for us to do as thorough of a job as we can, people can augment for their specific agencies. A lot of the “this makes it harder to get housing pieces” is something used at Dial/Self to explain how someone can enter the system, less of whether they can. On one hand it’s pragmatic, on the other hand it’s a conversation worth having if the participant wants to have it. Vast majority who sign won’t read this, reality is when you’re experiencing homelessness this is one more piece of red tape to cut in order to get stably housed. Rare that someone reading this will feel it’s asking too much, most of the time won’t be able to think about this. Maybe in future meetings we can talk about providing training/checklist of things for case managers to add to help clients understand the importance of reading what they sign. Think it’s worth keeping those things in, if you remove them you’re not letting them know it’s the case. All things equal many people would pick the one that’s less prying into data system, but the reality is that they aren’t equal and not sharing will limit your entry/services.

Cynthia- still thinking back to Laura’s distinction between access and sharing. An agency isn’t authorized to just go in and share a client’s records. Agency would likely have a referral and be viewed by agency working to help them.

For the second agency, if they were related to a service the second agency was providing, there might be reason to review past services and records.

Laura- sounds like statewide people are going to be able to look at history

Cynthia- “the information that is collected may be accessible by other agencies if they are providing services”. That language is more comforting than “I’m authorizing my data to be shared” which sounds like shared with everybody. Agencies have access, but aren’t going out and sharing actively. Then coordinated entry is more about sharing.

Amanda- purpose of us opening data is to stop asking the same questions of the same clients, so that someone doesn’t have to disclose over and over again. Maybe we can represent that better on this form, not about us trying to look for things because we want to but part of helping someone to obtain services. Could add to form- the reason we want to share/obtain information from another organization is because we don’t want to enter the information multiple times. Makes strength based, working on their behalf to be better on their end.

Great suggestion, we will definitely want to include a statement about less of a need to share the same information over and over when authorizing sharing between agencies. Some agencies will need to ask regardless depending on the agency and their intake procedures but overall it should reduce the amount of information someone needs to repeat.

The option to be coded in HMIS- Keeping or not? Leaning towards removing whole authorization to funders and just explaining what and why collection happens and that data shared with funders is aggregate.

Laura- given what Owen said about how people read things, personally rarely read lots of documents like this, most people probably don’t read this. The simpler and more concise they can be, the more someone actually knows what they’re saying. The longer it is the less likely to read it, the simpler and less wordy the better.

**Still to do:**

-Michele will try and put together a sample release of information draft based on our discussions from this meeting to send out prior to our next Data Evaluation Committee meeting for us to review there and continue to revise

-Need to consider changes to privacy and security plan

-Review/edit data collection notice posting

-Need to put together HMIS agency agreements and have agencies sign off on new plans

**Next Meeting:**

**May 25th, 3-4:30pm**