



HMIS

The Data Does Matter!

**MAINE HOMELESS MANAGEMENT
INFORMATION SYSTEM
Procedures Manual**

(Homeless Management Information System Policies & Procedures Manual)

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Maine HMIS Overview and Procedures

Introduction

In 2004 HUD the Department of Housing and Urban Development put forth rules regarding requirements for recipients of HUD related funding and other providers of services for the homeless to participate in a Homeless Information Management System. This manual outlines policies and related information on the State of Maine Homeless Management Information System (HMIS).

The State of Maine Homeless Management Information System (HMIS) is a collaborative effort between the MaineHousing, the dedicated lead agency, and the three Continuums of Care – Greater Penobscot, City of Portland, and the Balance-of-State. The Continuums of Care, individually and as a group, have an ongoing role in ensuring the success of Maine’s HMIS by giving input into HMIS policy decisions within the parameters established by the U.S. Department of Housing and Urban Development (HUD).

The software used by the Maine HMIS consists of ServicePoint, a nationally recognized web based HMIS software solution, plus supporting software for reporting. Some Maine HMIS participants who had developed information systems prior to the launch of HMIS do not use ServicePoint but participate by providing periodic “batch uploads” of information for use in reporting.

ServicePoint is a solution used in many other states. MaineHousing is also part of the New England Regional Homeless Management Information System (NERHMIS). By Choosing ServicePoint and being a member in NERHMIS the State of Maine Homeless Management Information System benefits from shared knowledge of the various New England members and ServicePoint users nationwide.

This manual contains information and procedures related to Maine’s Homeless Management Information System (HMIS). It is expected that this procedures document is not static and will be modified overtime as needed.

For more information regarding HMIS policies and procedures, please contact by email Clif Graves, (cgraves@mainehousing.org), or Cindy Namer, (cnamer@mainehousing.org). Maine HMIS staff can also be contacted by phone at 207- 626-4600.

<p>ServicePoint is a trademark of Bowman Systems. Windows is a trademark of Microsoft. Apple and OSX are trademarks of Apple Computer. Business Objects is a trademark of SAP AG</p>
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Maine HMIS Overview and Procedures

Access to Maine HMIS

System Availability

The Maine HMIS ServicePoint data entry web site will be available to participating agencies 24 hours a day, 7 days a week. In the case there is a planned outage or issues impacting availability users will be advised in advance if at all possible.

ServicePoint Licenses

ServicePoint is a web based database solution allowing any organization with internet access and authorization to be able enter and report on their client information. ServicePoint licenses are purchased by MaineHousing from Bowman Systems for use in the Maine HMIS system. MaineHousing also contracts with Bowman Systems to provide secure storage, backup and support for the Maine HMIS ServicePoint implementation.

Each participating agency who receives HUD related funding will be assigned up to two ServicePoint user licenses. Agencies that need more than two licenses may purchase additional licenses through MaineHousing. The Maine HMIS system encourages participation in HMIS by Non-HUD funded programs for the homeless. Non-HUD funded programs may also be assigned a ServicePoint license and may purchase additional licenses as needed.

HMIS / ServicePoint Provider And User Agreements

Each participating agency providing information to the Maine HMIS using ServicePoint or providing data by a batch upload process will provide the following forms and information.

- The *Agency Information Form* – Providing accurate and up-to-date information on the Agency Name, Primary contact for HMIS matters and other descriptive information regarding the agency.
- The *Agency Participation Agreement*
- One or more *User Policy and Responsibility* documents – one for each user who will need access to the ServicePoint.
- One or more *User Policy and Responsibility* documents – one for each user who will be uploading data by a batch upload process to the ServicePoint / HMIS system.
- One or more *User Policy and Responsibility* documents – one for each user who will be doing data entry into the ServicePoint / HMIS system.
- Copies of agency work at home policy and signed authorization for any user who will be accessing ServicePoint from an authorized home office

Access to Maine HMIS ServicePoint is allowed only from authorized agency locations!

Users are not permitted at any time to access HMIS / ServicePoint via the Web from unauthorized public locations where the potential exists for unauthorized persons to view client information. Examples of locations which would not be permitted are a public location such as a cyber café or Starbucks or working at home in a room where family members or others could easily see client data being worked with.

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Access to Maine HMIS ServicePoint from a authorized home office

MaineHousing and other participants in the Maine HMIS who have written and enforced work-at-home policies may authorize home office locations as authorized agency location for Maine HMIS ServicePoint use given the home office location is structured to assure that viewing of client information by unauthorized persons does not happen. A signed copy of work at home authorization and the related work at home policy should be on file at the MaineHousing HMIS office for anyone who works with ServicePoint from a home office setting.

ServicePoint User Activation

As soon as possible following receipt of the completed and appropriate signed user agreement form(s) from an agency participating HMIS by the Maine HMIS Administrator at MaineHousing

- The new ServicePoint user will be given an initial introductory training on the use of ServicePoint.
- The new ServicePoint user will be provided with a user ID and password by the Maine Housing HMIS staff

Updating HMIS / ServicePoint Provider And User Agreements

At any time that there is a significant change at the agency level which impacts the use of the HMIS system it is the agency's responsibility to immediately notify MaineHousing.

Failure notify MaineHousing HMIS staff of changes could expose confidential client information or negatively impact the HMIS overall.

Advise MaineHousing HMIS staff as soon as possible of staff / Agency changes.

MaineHousing HMIS staff must be advised in writing as soon as possible and provided with appropriate new or updated forms when:

- A ServicePoint user is no longer employed at the agency or moves to a position where they are no longer responsible for HMIS data entry.
- If at all possible, on or before the last day of any ServicePoint user so that their access to ServicePoint may be discontinued.
- Whenever New Staff Member needs access to ServicePoint or the batch upload process.
- The staff person responsible for batch upload is no longer employed at the agency or moves to a position where they are no longer responsible for HMIS data.

The agency will supply new or revised forms whenever there are any changes to the information contained in The Agency Information Form, The Agency Participation Agreement, or the Batch upload agreement or the User Policy and Responsibility documents

(Copies of the various current HMIS forms will be available online and are included at the end of the printed version of this manual.)

Confidentiality, Privacy, and Security

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Protected Personal Information

HUD identifies certain information in the required Universal Data Elements as **Protected Personal Information**. The Agencies, Continuums of Care, MaineHousing Staff, and Maine HMIS users must use special care when working with or printing out data involving protected personal information such as:

- Names
- Social Security numbers
- Date of Birth
- Dates of program participation
- Any other unique identifying number, or code

The intent is always to keep all client information private at all times, and to share any client information only with release of information from the client. Some situations are recognized in HUD rules, and in Federal, or State law that make release of this information necessary or even mandatory.

HUD rules published in the federal register state:

“4.1.3. Allowable HMIS Uses and Disclosures of Protected Personal Information (PPI) A CHO may use or disclose PPI from an HMIS under the following circumstances:

- (1) To provide or coordinate services to an individual;**
- (2) for functions related to payment or reimbursement for services;**
- (3) to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions; or**
- (4) for creating de-identified PPI.”**

“Uses and disclosures required by law. A CHO may use or disclose PPI 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 PPI 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.”**

Special Note on Confidentiality and Release of Information

The procedures and processes described in this section reflect HUD requirements, and current understanding of best practice in recording, using, and sharing of HMIS data by shelter providers and the use of that data in HMIS systems.

Some shelter providers may also provide professional medical, substance abuse, or other services with specific privacy requirements. Use and sharing of data regarding those services may have requirements not outlined here.

Use of ServicePoint without a release of information

To the extent that client data is entered into the agencies database or ServicePoint where the database or

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ServicePoint is acting solely as that agencies database, no information is considered released. In this case, MaineHousing and ServicePoint staff who do have access to this data are acting as consultants to the agency.

A release of information is required whenever identifiable data is released to another agency other than as required by mandated reporting rules and other releases required by law.

Release of Information

By participating in the Maine HMIS, agencies and users agree to high standards of confidentiality and to seek explicit authority and permission from clients for release of any identifiable client information.

The client has the right to have access to their own data.

- A Release of Information form must be signed by a client (even to low-barrier shelters) before any protected personal information can be shared.
- Written interagency data sharing agreements (if any) between particular agencies (i.e., Memoranda of Agreement) will have to be in place and on file at MaineHousing prior to sharing of information within Maine HMIS ServicePoint across agencies.
- All agencies participating in HMIS will be required to follow all current data security practices detailed in this document, and adhere to ethical data use standards, regardless of the location where agency users connect to HMIS.
- The client will have access to view, or keep a printed copy of, his or her own records contained in the HMIS.
 - The participating agencies and MaineHousing reserve the right, granted under federal and state statutes, to charge a fee to cover reasonable costs for the retrieval and printing of such client information.
- A privacy notice shall be prominently displayed in the program offices where intake occurs. The content of this privacy notice shall be in accordance with HMIS Privacy Standards in: Federal Register / Vol. 69, No. 146 / Friday, July 30, 2004 and any other applicable standards.

Client Consent

Securing client consent

Clients must be informed about the intended use of protected personal client information at the time the information is collected. Agencies are responsible for having the proper procedures in place to ensure the consent to use the information in the intended manner is understood by the client.

- A sign or signs that explain the general reasons for collecting information must be posted where clients can see it in the intake area.
- Consent for individual data collection and entry into HMIS/ServicePoint may be inferred from the circumstances of the collection.
- A verbal explanation stated in plain language should include a description of HMIS, how the information will be used, how it will be protected, and the advantages of providing accurate information.
- It is also appropriate to provide a written description that echoes the verbal explanation for the consumer to keep for review. Individuals should understand exactly what they are consenting to, including the specific content of the information that will be shared.
- A verbal explanation stated in plain language should explain that individual has the right to revoke the consent in writing, except to the extent that the information has already been released based on a release of information.

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- The consent procedure should document the information being shared and with whom it is being shared and be the release be signed and dated by the individual.
- Should a client verbally consent to releasing protected information but be unwilling to sign a consent form, two staff members should witness and document that fact.

Client worries regarding computer information.

It is understood that the idea of entering information into a computer is worrisome for some clients. It is the responsibility of the participating agency and it's staff to make every effort to ease that worry and secure informed consent for data to be used in HMIS.

Client Grievance

Maine HMIS itself does not intend to create or establish any unique grievance management processes. All agencies are responsible for setting up an internal grievance process to handle client complaints related to HMIS, including grievances related to consent and release of information.

HMIS Security

Every effort must be made to assure that protected client data is handled securely, responsibly and in accord with the client's wishes.

HMIS system administrators in coordination with appropriate agency staff are responsible for validating, establishing, and granting security permissions and making sure security procedures are followed. MaineHousing HMIS database administration staff shall have necessary and appropriate access to data submitted by participating organizations as needed to administer the HMIS software, resolve data issues, and assure data security and integrity.

Security Procedures

- Maine Housing and the Maine Housing HMIS staff are responsible for assuring that client information in the Maine HMIS system is handled responsibly.
- Each agency is responsible for administering its own users and assuring that they receive adequate training in the confidential handling of client information.
- The MaineHousing ServicePoint system administrators are responsible for setting up ServicePoint users, User IDs and passwords
- Each new ServicePoint user will review this document and be provided initial training on the use of ServicePoint.
- The signed User Policy Agreement form for each ServicePoint user will be on file at MaineHousing before they are allowed access ServicePoint.
- It will be the Agencies' responsibility to immediately inform MaineHousing HMIS staff of any staff changes (Resignations, transfers, etc) involving ServicePoint users.
- The Maine Housing System Administrators will have access to the complete list of ServicePoint users.
- In addition to ServicePoint, passwords and other security processes will be required and used for other areas of HMIS, including the reporting module and the batch upload module.

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- Any paper or other hard copy generated by or for HMIS that contains identifiable information must be under constant supervision by an HMIS user or developer when in a public area.
- When staff is not present, the information shall be secured in areas that are not publicly accessible.
- Any and all printouts / hard copies of ServicePoint information must be kept in a secure file.
- When any printouts / hard copies of ServicePoint information are no longer needed they will be shredded or otherwise properly destroyed to maintain confidentiality.
- Written information, specifically pertaining to user access (user name and password) shall not be stored or displayed in any publicly accessible location.

Right to deny or restrict user access

Every user bears responsibility for assuring the proper and appropriate use of the material he or she chooses to access, store, print, send, display, or make available to others.

MaineHousing reserves the right to deny or restrict user access as a result of the user not following the rules and guidelines in this manual or for any other inappropriate use of ServicePoint / HMIS data.

Some Inappropriate use of HMIS include:

- Intentionally entering or altering HMIS records to misrepresent dates, amounts, or types of services a client or clients received.
- Unauthorized access, alteration, destruction, removal, and/or disclosure of data and/or information.
- Disclosure of confidential passwords or personal identification numbers
- Malicious or unethical use, and use that violates federal laws

User IDs and Passwords

The computer username and password is the key to a computer system. Passwords help to ensure that only authorized individuals access the HMIS. The HMIS / ServicePoint password also help to determine accountability for all transactions and other changes made to system resources, including data. Sharing a password is giving an unauthorized individual access to the system.

The relevant authorized user(s) will be held responsible if an unauthorized individual uses their access privileges to damage the information on the system, to make unauthorized changes to the data, or to release client information.

Rules for safe computing and User IDs and Passwords

- DO NOT share your ID or password with anyone else.
- DO NOT use someone else's ID or password. If you need more access than you presently have or if you are having problems with your access, contact the HMIS System Administrator at MaineHousing for help.
- DO NOT use obvious, trivial, or predictable passwords.

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- Obvious, predictable and trivial passwords include: names of relatives or pets; street names; days and months; repetitive characters; dictionary words; and common words such as PASSWORD, SECURITY, SECRET, etc.
- BEWARE of "shoulder surfers". These are people who stand behind you and look over your shoulder while you are keying in your password or PIN, or while you are working with confidential information.
 - DO NOT use your access level to enable other individuals to access information that they are not authorized to access, or to submit transactions that they are not authorized to submit.
- NEVER write down your passwords or post them on your terminal or other obvious places.
- ALWAYS change the initial password assigned to you by your administrator as soon as you receive it.
- LOG OFF when finished using your terminal or workstation, or if you are stepping away from your desk, even momentarily.
 - If a user will be going to be away from the office for an extended period (e.g., maternity leave or vacation), notify the System Administrator at MaineHousing to have the ID temporarily suspended. (an alternative temporary user can be appointed and trained for data entry during the absence).

ServicePoint HIPPA Compliance

Data entered into ServicePoint is stored in a HIPPA compliant data center. Methods used to insure that ServicePoint is fully compliant with HIPAA data center standards include:

- Network Security includes firewalls, certification servers, VPN access, and Operating System authentication.
- Encryption (optional) is a database level security which encrypts confidential information located in the database tables.
- Audit Trails log and report on users who have viewed, updated, or deleted client records.
- Client Record Privacy Options allow or restrict access to all or part of a client file, including individual fields (data level).
- Automatic Timeout logs a user out of the system after a specified period of idle time, thereby decreasing the potential viewing or manipulation of client data by unauthorized individuals.

Reports

Maine HMIS will provide a set of useful reports. When ServicePoint is utilized by an agency, agency-specific operational reports, including agency-level APR reports, generated with the ServicePoint System will be available.

Non-Identifiable Information and reporting

HMIS as implemented in Maine is a system which can provide reports required by HUD, the Continuum of Care, and other stakeholders at a reporting level that does not identify individuals but can provide accurate statistical data including, numbers served, trend assessments, and non-duplicated statistical reports based on data entered into the Maine HMIS. The principal tool for this is the Homeless Initiatives Database.

ServicePoint ART reports

All Maine HMIS users who use ServicePoint will have access to reports created in the Business Objects based Advanced Reporting Tool. MaineHousing staff dedicated to the HMIS project will assist the agencies to work

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with existing ART reports and to develop and manage new needed agency-level reports. Service Point ART reports are intended to meet a broad range of intra-agency reporting needs. Agencies are encouraged to identify reporting needs to help create reports to address their internal agency needs.

Agencies that have the resources to create their own custom reports can use exported data from ServicePoint as data sources for their own custom reports. PLEASE NOTE: Any data exported or reports printed may contain personal identifying information and if so must be considered confidential and handled as such.

State wide and Continuum of Care reporting

Data from ServicePoint and from batch providers will be used to produce COC and State level statistical reports required by HUD and will be used in various HUD applications and reports.

ServicePoint assessment and report customization

Agencies may work with the MaineHousing HMIS team to create additional custom assessments in ServicePoint needed to address agency needs.

Agencies will be able request additional reports or changes to existing reports. Within the given time and resources, the HMIS team at MaineHousing will create additional reports and assessments as requested by participating agencies and as needed for reporting to COCs, HUD, and others.

Computer Resources

Maine's HMIS ServicePoint implementation is web based. Agencies with minimal computer resources can effectively use ServicePoint.

Participating Agency Hardware and Software Requirements

Use of ServicePoint will require agencies to have a minimum of one Personal Computer running a current version of Microsoft Windows or Apple OSX, A current web browser (FireFox or Internet Explorer), and (optionally) one printer. Use of some advanced features in the ServicePoint Advanced Reporting Tool may require installing a specific version of the Sun Java Runtime.

Agencies who are maintaining their own client database system will need to have the ability collect and store data for the HUD universal and program specific data elements and to export data in a format which can be batch uploaded to the Maine HMIS system and or ServicePoint.

Participating Agency internet access requirements

ServicePoint is a web based solution. Use of ServicePoint will require agencies to have reliable Internet access. High-speed internet access (such as DSL or cable broadband) will be more satisfactory than 'dial-up' access but ServicePoint can be used with 'dial-up' access. Agencies submitting data to HMIS by batch upload will require reliable high-speed Internet access.

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Maine HMIS computing assistance

Maine's HMIS is committed to assisting agencies, where we can, with hardware and communication procurement and with installation of software. This assistance is for the primary purpose of assisting the agency in accessing and using the Maine HMIS ServicePoint and contributing data to the Maine HMIS.

Maine HMIS may from time-to-time, under special circumstances, provide other hardware, connectivity, or technical assistance.

Onsite test of hardware and connection to the Maine HMIS ServicePoint application over the Internet plus general phone support regarding access to ServicePoint may also be provided when deemed appropriate.

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Technical Support

Problems may be reported and questions asked 24 hours a day using the Help form at <http://mainehmis.org/help-request-form/>. Problems or questions submitted using the help form will be addressed by the next available HMIS staff person. The MaineHousing HMIS staff will be available most work days from 9-4 to provide telephone or email “Help Desk” assistance regarding ServicePoint usage. Where problems are identified specific to the ServicePoint software which cannot be resolved at the Maine HMIS level, and requires intervention by Bowman Systems, the HMIS Administrator will provide the interface with Bowman Systems and follow any such issue through to resolution.

Participating agencies are responsible for providing their own technical support for all hardware and software systems used to connect to HMIS and for maintaining internet access (preferably a high speed internet account). Internet connection difficulties will need to be managed between the agency and their Internet Service Provider.

Maine HMIS Training

Formal support and training regarding the use of ServicePoint will be made available periodically. This support will be offered in various formats including onsite, classroom style, and internet delivered. Other trainings will be developed and presented as needed.

E-mail Communications

MaineHousing HMIS staff will use e-mail and the MaineHmis.org web site to share information, announce training opportunities, and make HMIS users aware of HMIS related information. HMIS users should be sure that MaineHousing HMIS staff have up-to-date e-mail address to assure that they get all relevant HMIS communications.

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Maine HMIS and the HUD Elements

Minimum Required Data Collection, The HUD Universal Data Elements.

Each agency is responsible for the data quality and completeness of the data they enter into HMIS. Each agency (with the exception of those serving domestic violence victims) is required to make every effort to collect complete and accurate client reported data for each of the items listed as part of the HUD Universal Data Elements listed in the table below.

HUD Universal Data Elements
Name
SSN
Date of Birth
Ethnicity and Race
Gender
Veteran Status
Residence Prior to Program Entry
Zip Code of Last Permanent Address
Housing Status (HUD)
Program Entry Date
Program Exit Date

The HUD Program-Specific Data Elements

The HUD Program-Specific Data Elements are required for the HUD APR.. Every effort should be made to collect this information, as appropriate, for each client served.

HUD APR Program-Specific Data Elements
Income and Sources
Non-Cash Benefits
Physical Disability
Developmental Disability
HIV / AIDS
Mental Health
Substance Abuse
Domestic Violence
Services Received
Destination
Reason for leaving

ServicePoint includes many other modules which may be useful to some organizations. Agencies may use those ServicePoint tools and are welcome to collect additional information beyond the HUD Universal Data Elements for the own internal purposes.

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Quality Control

Data from the Maine HMIS will be used to document regional, continuum of care and statewide needs. Data from the Maine HMIS will also be used to document services provided to the homeless. The Maine HMIS will provide statistics and outcome measures for presentation to HUD, other funders, and stakeholders.

For Maine HMIS to be able to provide accurate timely information, data must be regularly, completely, and accurately entered into the Maine HMIS system. Assuring that data entered is entered is complete and accurate is the responsibility of the providers collecting and entering the data.

Data Integrity

HMIS users at the participating agencies are responsible for the accuracy, correctness, and timeliness of their data entry and are responsible for ensuring that the HUD Universal Data Elements and that appropriate HUD Program Specific Data elements are being collected.

Data Integrity Expectations

- Data entry into ServicePoint must take place, as soon after the entry or change in data as possible. Data should be entered or updated at minimum, within the week of entry or change in data.
- The ServicePoint data for ART reporting will be updated overnight every night. Data changed today will be available tomorrow for reporting in ART

Data Loading

Loading data into ServicePoint from other databases

Under some circumstances, MaineHousing HMIS staff will work with individual agencies as needed to provide a mechanism to do a one-time load of historic client data from existing agency systems into the Bowman ServicePoint system. This process may have additional costs.

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Data Availability and Disaster Recovery

In the event of a disaster impacting some of Maine and or the MaineHousing offices, ServicePoint access and availability is unlikely to be impacted. ServicePoint itself is located outside the state and maintains data in a secure fall back location in separate part of the US. Access to ServicePoint requires internet access so any disaster which impacts internet access for some or all of the Maine's ServicePoint users will render ServicePoint unreachable by them until that internet interruption is resolved.

Should a disaster impact the MaineHousing office, The Maine Housing disaster recovery plan calls for the Maine HMIS Help desk and support functions to be able to be running within a week.

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Addendum - Maine HMIS Forms and Use Guides

- A. Agency Participation ServicePoint Agreement
- B. HMIS Agency Batch Upload Participation Agreement
- C. HMIS Agency Information Form
- D. HMIS Provider Information Form
- E. HMIS ServicePoint User Policy Agreement
- F. HMIS VIRTUAL OFFICE User Policy
- G. HMIS Unnamed Client SSN Agreement
- H. Data entry using Maine HUD Universal Data Elements Screen
- I. Sample HMIS Release of Information
- J. Annual Housing Chart Survey
- K. ServicePoint setup information sheet
- L. HMIS Program Description Form
- M. Organization Business Associate Agreement

Sample Release of Information and other sample HMIS related forms are available from the HUD sponsored HMIS information site <http://www.hmis.info>

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