Data Evaluation Committee Notes

8.25.21

**Present:** Shaundell, Amanda, Owen, Matt, Michele, Kathy

**New HMIS Implementation Updates-** At this point all of the agencies which use HMIS are built and the majority of programs have been built out as well. The only items remaining are Soldier On’s projects and “informational” agencies and projects- we need to include every project on our housing inventory chart, even if they don’t collect information in the HMIS. User profiles and sharing settings have been set up and next we need to build out the Coordinated Entry system and vulnerability assessment. Our go live date has been pushed from December 7th to December 9th after Bitfocus asked to push the data migration until after October 1st when new data standards come out. We are planning of series of trainings for this fall and winter and hope to be able to hold a training in October to introduce some new items from the Data Quality and Privacy and Security Plans.

**Planning Our HMIS User & Agency Agreements, Privacy and Security Plan –** (some information included from last month’s meeting)Michele spoke with Eric Gammons about our privacy and security plan and he clarified a few details for us. The plan DOES need to apply equally to all users in the system even non-mandated ones but the role of “partner agency security lead” doesn’t have to be a staff person at the partner agency. For smaller agencies and non-mandated ones, we could appoint people from the Data Eval Committee to take on that role. The key thing is to make sure that roles and responsibilities are clearly identified.

Owen- would that be an unusual situation for other agency staff? To oversee other agency’s privacy and security.

It was discussed how this role will likely be filled by CoC staff if possible, to avoid any conflicts between agencies monitoring one another’s privacy and security.

Eric has a lot of time left for his HUD contracted work to help MA CoC’s with vendor transitions and HUD is switching those remaining hours for Eric to provide TA to help us with our HMIS documents like the plans we’re working on now. Michele spoke with Eric again on 8/23 and he confirmed that he will be able to assist us with our HMIS policies and procedures and other HMIS implementation assistance. He also confirmed that for data sharing across agencies in the CoC, data sharing agreements do not need to be set up between each agency. It is the privacy notice and our release of information which allow us to turn on data sharing between agencies in the HMIS, as decided by this committee. We don’t have to figure this all out prior to the system going live. Should we hold special meeting to determine?

Data sharing across agencies – Shaundell- I think this committee has the ability to make the decision but calling partners together would also be a great idea.

Owen- definitely simplifies things not to need data sharing agreements for every agency. In the years at D/S there have been maybe a dozen youth who read releases, most will just sign because they need assistance. Our releases have to be 1 year maximum, tracking that takes time. Would prefer to try and bring more people into the conversation if possible. Give everyone one more chance, explain what we’ll be deciding and invite more partners.

Amanda- when we talk about data sharing, people feel like we’re sharing information without a purpose. Should clearly define the limited data we have access to and the purpose of sharing it. The buy-in from agencies around how and why we’re sharing a system and giving access to data we know about. Needs to be defined so that agencies have clear information around how and why we’re sharing. Have a solid why we’re doing it on the agency side.

Owen- only as secure as the weakest link, now sharing that responsibility across numerous agencies. Agree with Amanda, having everything clearly defined at agency level is very important as well. Another risk- depending on the ability of the system, will people from other agencies be able to add remove or edit data entered from another agency?

Michele- No, only myself will be able to make changes/delete information at any agency

Owen- Will be worth highlighting that piece, others will likely be concerned of the risk

Amanda- useful to define that as well. Is it just enrollments?

Owen- more defined process, in the software, outside of basic information, program specific elements are those stored on the same page? Is that separate or a list interspersed? Want to make sure we’re setting up in a way that staff aren’t stepping on other’s toes

Michele- Not quite sure yet but I’ll test things out! We’re waiting to pay to copy over the live site configuration to the training site once the configuration is complete. Will set up some more test programs/data to try before the live version is copied.

Kathy- For EOHHS, will they still be in Green River or in the new HMIS?

Right now we’re staying in Green River but exploring building it out in Clarity or waiting for the state to open it up in their warehouse.

Eric also mentioned that since a lot of HUD’s HMIS privacy/security requirements were written in 2004, they’re out of date and don’t all strictly need to be adhered to. PKI and IP whitelisting for example, if we ask Eric to ask HUD, it will become real and we will need to do it. If we put it in our plan, we need to do it. If we don’t put it in our plan, there’s a chance that HUD could monitor us and see it’s missing and then tell us to implement it. Eric says that if our IT department thinks it isn’t needed, it’s unlikely HUD will come looking for it but if the IT department says it could be an issue then we should put something in place.

Owen- seems reasonable, our security policy is going to cover wide swatch of things. Things we’ve talked about in our security plan are probably sufficient for D/S. Sounds reasonable not to include those things and if HUD decides they want them we can implement them.

**What next? Finishing up privacy and security plan? Continuing to work on Data Quality Plan and worksheet?** – For the remainder of the meeting we went through the privacy and security plan again to try and review what has been decided already and finish making changes. Didn’t get all the way through, but made some important changes to make the process smoother and clearer for agencies. The need to check releases of information will be removed from the workstation checklist as it was discussed the difficulty in reviewing those per workstation and are checked during site monitoring and in Clarity it may be a requirement prior to creating clients at all, would be done in the HMIS instead of paper. The edits are included in the version of the plan that was sent out with these notes. Going to ask committee members to finish reviewing what we didn't get to and send Michele feedback so that we can prioritize the data quality plan during the next meeting. After incorporating final feedback from committee members the privacy and security plan will be sent out to partner agencies and the board for review.

Windows Defender – is this adequate for a firewall/antivirus software? Think so but will double check with Eric.

**Next Meeting-** Our next meeting is scheduled for September 22nd from 3-4:30pm.