

HEART PROGRAM MANUAL

PROGRAM OVERVIEW

The Homeless Engagement, Assistance, and Resource Team (HEART) is a co-responder team that pairs a community navigator with local law enforcement to provide support and resources to those who are unhoused in Douglas County. HEART Navigators are subject matter experts with experience and expertise in homeless systems of care, behavioral and mental health, or case management. The HEART proactively interacts with those who are unhoused in a compassionate way. They gather information on needs, assess vulnerability, provide wrap-around case management, and make referrals to appropriate community services.

Our Values

We develop and promote a positive image of the co-responder model within the team, with members of the public, and community partners; we lead with compassion; we collaborate with faith-based and non-profit community partners; we work to connect individuals to resources that help resolve their present issue; we encourage and motivate individuals to take necessary steps to better their situation; we are person-focused and balance compassion with public safety; we value and recognize the background and cultural needs of individuals during every interaction;; and we maintain client confidentiality.

Our Goals

Program Goals: We strive to know by name all those in Douglas County who are unhoused. To achieve our goal, we physically canvass the community and maintain active relationships with key partners who interact with unsheltered individuals. We are committed to building and sustaining a new future where homelessness becomes rare, brief, and nonrecurring.

Client-Centered Goals: Once we make contact and establish relationships with unhoused people, we collect and record data into the Homeless Management Information System (HMIS) about clients, services provided, progress notes, and other information for current and future use to work with clients. In addition, we assess client needs and develop housing and service plans. Within 30 days of enrollment, staff will complete required assessments, develop service plans, and provide options to help clients exit homelessness.

Organizational Structure

HEART operates within Douglas County's Department of Community Services which is governed by the Douglas County Board of County Commissioners. The HEART leadership team meets monthly and is comprised of Douglas County staff, HEART supervisor, and law enforcement leadership. The purpose of these meetings is to strategize, share data, and coordinate between agencies actively providing outreach and connection to services. Activities at this meeting may include (but are not limited to) planning responses to changes in encampment locations and predicted sweeps, case conferencing planning, coordinated entry and data discussions related to outreach, or cold weather response.

DEFINITIONS

Colorado Homeless Management Information System (COHMIS)

COHMIS is a locally administered database that collects, stores, and centralizes real-time data about housing opportunities and people experiencing homelessness . To maximize COHMIS and effectively capture real-time client- and community-level data, the COHMIS data entry must be timely, consistent, accurate, and complete. Training for all users is provided by Metro Denver Homeless Initiative (MDHI). All users are required to complete the initial online

training of COHMIS immediately after being hired on to HEART. Refresher courses are assigned annually. Navigators are also required to complete specific training for Coordinated Entry and General Data Entry. Navigators are required to track data in COHMIS to include (but not limited to) program entry, services provided, employment, education, health, military status, domestic violence, and program exit. Current Living Situation, Status Update, Quarterly Assessments, and Annual Assessments must be completed in COHMIS as appropriate. When housing, employment, income, or disabling conditions change, navigators must update the client's COHMIS profile by the end of each shift.

OneHome Coordinated Entry System

The OneHome Coordinated Entry System (Coordinated Entry) is a client-centered process that assesses and identifies the housing needs of those who are unhoused. Coordinated Entry matches individuals, youth, and families to the appropriate available housing resources while promoting client choice. Coordinated Entry Assessments (CESA) should be offered to individuals within the first 30 days of enrollment and documented in COHMIS. If an individual or household declines the CESA, staff should re-offer the assessment at a later date and document all accepted or declined offers in COHMIS.

- OneHome CESA Tool: Assessment that determines an individual's level of vulnerability
 - CESA for Single Adults should be completed with individuals aged 24 and older.
 - CESA for Families should be completed with individuals with children and/or spouses.
 - CESA for Transition Age Youth should be completed with individuals aged 18-24 years old.

- Veteran Assistance
 - Clients who identify as prior military should be added to the Veteran By Name List (BNL) through OneHome within COHMIS during the initial intake.
 - Once a Veteran is actively enrolled to the BNL they are identified as being literally homeless*, and staff should immediately complete a CESA if the Veteran wants to be prioritized for housing resources. (*Defined below under "Homeless Status").

Built For Zero (BFZ)

Community Solutions has developed a movement and methodology to measurably and equitably end homelessness, one subpopulation at a time. Their goal is to achieve a milestone known as functional zero – an ongoing state where homelessness is rare, brief, and nonrecurring. BFZ has been adopted by the State of Colorado, regionally through MDHI and locally through the Douglas County Homeless Initiative.

By-Name List (BNL)

The BNL is a tool utilized by a community to understand who, by name, is unhoused within their community at any given time. A local system is in place to ensure the collection of quality data with the goal that 90% of those who are unhoused within the Douglas County community are represented on the BNL. The utilization of our BNL ensures that an equitable and efficient coordination and referral process is in place for the HEART, staff, community partners, and for those who are unhoused. The active all population BNL is reviewed through weekly case conferencing meetings. If individuals have not been located for the past 60 days, and two attempted contacts have been made each month, they will be moved to the inactive list.

ELIGIBILITY REQUIREMENTS

HEART serves those who are homeless as defined below:

Homeless Status

Individuals or families must experience at least one of the following categories as defined by the Department of Housing and Urban Development (HUD) to be considered literally homeless:

Category 1: Unsheltered (Literal) Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- An individual or family with a primary night-time residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground
- Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals)
- An individual who is exiting an institution where they resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2: Imminently Homeless

An individual or family who will imminently lose their primary nighttime residence provided that:

- The primary night-time residence will be lost within 14 days of the date of application for homeless assistance
- No subsequent residence has been identified
- The individual or family lacks resources or support networks (e.g., friends, family, faith-based or other social networks), necessary to obtain other permanent housing

Category 3: Youth and Families

Unaccompanied youth under 25 years of age or families with children and youth who do not otherwise qualify as homeless under this definition, but:

- Share the housing of other persons due to loss of housing, economic hardship, or a similar reason
- Live in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance
- Have experienced persistent instability as measured by two or more moves during the 60-day period immediately preceding the date of applying for homeless assistance and
- Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment

Category 4: Domestic Violence

Any individual or family who is:

- Fleeting or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence
- Has no other residence
- Lack the resources or support networks (e.g. family, friends, faith-based or other social networks, to obtain other permanent housing)

SERVICES

Through case management and regional partnerships, HEART connects individuals and families to local non-profit and faith-based social service organizations for needed emergency shelter, food, clothing, transportation long-term housing options, and other needed services.

Supportive Services includes client contact, case management, benefit assistance, document acquisition, access to regional shelters, transportation, hotel vouchers, housing search or applications or placement including regional coordinated entry, and food or basic needs.

Shelter Services includes the HEART assisting individuals to emergency and referral-based shelters which are listed in the regional 211 system.

Emergency Hotel Vouchers (EHV) may be available when no suitable shelters are accessible for unhoused individuals. The EHV Policy outlines eligibility criteria and requirements.

STAFF PROGRAM EXPECTATIONS

Hours of Operation

The HEART generally operates seven days a week between the hours of 6:00 a.m. and 8:00 p.m. This schedule may be adjusted seasonally due to pre-planned activities or at the direction of the HEART Supervisor to better serve the community. Schedules will be rotated on an annual basis. Shift bids will begin in November of each year and navigators will submit their top two choices to the HEART Supervisor via email. A typical work schedule is four 10-hour shifts that may include one day each weekend. Additional day, evening, weekend, and/or holiday hours may be required for certain special events or planned outreach efforts.

Shift Selection Order

Employees currently assigned to a weekend shift will have first priority in the shift selection process and placed in Group 1. Employees working weekday shifts will be placed in Group 2. Selection orders within each group will occur based on seniority.

Timeliness

- HEART has obligations to other stakeholders under the co-response model. Prompt arrival for scheduled shifts is required.
- HEART Navigators shall report to the office and be present at the start of their scheduled shift time.
- HEART Navigators shall forward the HEART Hotline phone number from DCSO Dispatch to their County-issued cell phones immediately upon arrival for their scheduled shift.

- If a Navigator does not have a deputy available for their shift, the HEART Navigator shall log into the Shield Force application within the first 15 minutes of their scheduled shift and be available for calls.
- HEART Navigators shall have their DCSO issued radios turned on within the first 15 minutes of their scheduled shift.
- HEART Navigators shall log into the text messaging application within the first 15 minutes of their scheduled shift.
- The last HEART Navigator on shift for any given day shall forward the HEART Hotline phone number to DCSO Dispatch at the end of their scheduled shift.
- The last HEART Navigator on shift shall mark themselves as unavailable in the text messaging application at the end of their scheduled shift.

Radio Protocol

- Douglas County Sheriff’s Office provides the HEART with handheld radios while in the field.
- HEART Navigators are required to carry a radio while in the field.
- Appropriate radio protocols as defined by DCSO should be followed at all times.
- It is the responsibility of each HEART Navigator to ensure that their radios are fully charged for the start of each shift.

Phones

- County-issued cell phones need to be on and available during work hours for effective communication with Douglas County customers, partners, and business associates.
- “Find Friends” and location sharing should be on and ready during your scheduled shift.
- DCSO Shield Force application shall be installed on the phone and utilized at all times during your scheduled shift, if there is no deputy available.

Purchasing Cards

- County-issued purchasing cards will be issued to each navigator.
- All county policies and procedures for reconciling purchases must be completed after each purchase is posted.

Meals/Breaks

- Uninterrupted meal breaks are unpaid.
- If you work a 4/10 schedule, you work 10 hours per day, plus the time you spend on the unpaid meal break.
Examples:
 - Your assignment allows a 30-minute unpaid meal break; as a result, your total work shift is 10.5 hours each day.
 - Exceptions are applied as navigators must remain “in service” on Shield Force and available to take referrals during meal breaks; any time consuming your meal is paid, so you do not work the additional 30 minutes as described above.
- Heart units should limit the amount of social time spent together in one place as referrals are received from different areas throughout the county.

COHMIS Documentation

- Navigators are to track all outreach efforts and client data in COHMIS including, but not limited to, program entry, services provided, employment, education, health, military status, domestic violence, and program exit.

- Navigators must continually update client income and status as appropriate.
- Case notes should be used to provide pertinent information regarding the individual served. The guiding principle is that another HEART member should be able to provide appropriate follow-up based on case notes if the navigator assigned is not available.
- Case notes should include the date and number of minutes spent with the client. Minutes are rounded to the quarter hour; each phone call is recorded as 15 minutes unless it exceeds 15 minutes, the appropriate rounding is used. These notes are entered in the “**Services**” and “**Contacts**” sections of COHMIS.
- Active HEART clients will have a minimum of one contact per month for case management support.
- If individuals have not been located for the past 60 days, and two attempted contacts have been made each month, they can be closed and removed from the HEART Street Outreach Program in COHMIS and on the BNL.
- Attempts to contact clients shall be documented in the notes tab under the program in which the client is enrolled.
- Entry of data information into COHMIS is required to be entered before the end of your shift.

BNL Documentation

- Newly enrolled clients must also be added to the Douglas County BNL, and all fields must be filled out as applicable.
- Living situation, income, status, last known location, and any relevant comments shall be updated in the BNL each Wednesday by 5:00 pm.
- Once a client has exited the HEART program, update the exit outcome and exit status in the BNL, as appropriate.

Time Off

The HEART Navigators are required to follow all policies and procedures related to vacation, holidays, and time off as outlined in the Employee Handbook. In general, it is the goal of the County to have at least one HEART team available each day, except on observed holidays. The following guidelines are established to ensure appropriate staffing and coverage:

Vacation

- The County encourages all staff to utilize their available time off to care for themselves and their families as allowable.
- All vacation requests must be approved by the HEART Supervisor in advance. Approval may be based on the availability of other HEART units to ensure coverage during the time requested.
- County staff are provided with eleven (11) and one-half days of vacation each year. The compensation rate is equal to 8 hours per day or a total of 92 hours per year.

Holidays

- For County employees, when a holiday falls on a weekend, the adjacent Friday or Monday is observed as a holiday. For the HEART, the actual Holiday will be observed when the holiday falls on a regularly scheduled shift. If the County observance falls on a scheduled day off, the Navigator will be entitled to 8 hours of comp time to be used on the Wednesday during the week in which the holiday occurs or as adjusted by a supervisor.
 - *Scheduled to work on a holiday:* If the 4th of July falls on a Saturday and the HEART Navigator is regularly scheduled to work that Saturday, they will receive 8 hours of holiday pay for the 4th of July. The

Navigator would be expected to work on Friday, July 3rd, even though the County offices are closed for regular business.

- *Schedule day off falls on observed holiday*: If the 4th of July falls on a Saturday the County observes the holiday on Friday, July 3rd. If the HEART Navigator is scheduled to be off on that Friday, the HEART Navigator may schedule 8 hours of comp time on the Wednesday during that week (on July 1st in this scenario).
- HEART Navigators work 10-hour shifts, and the County compensates employees with 8 hours for each holiday, the Navigator must choose to either, a) work an additional 2 hours during the week in which the holiday occurs OR b) utilize vacation or personal time off for the additional 2 hours associated with that holiday

Due to the operational requirements of the HEART certain scheduling flexibility will be expected during the weeks of Thanksgiving, Christmas, New Years and for other special events as needed.

Training

The framework for new HEART employees will consist of six weeks of training that will include: 12 ride-alongs, online trainings, and a final evaluation that will be completed by the HEART Supervisor. The components for field evaluations will be assessed on a “1” through “7” scale, with a “1” being Unacceptable, a “4” being Acceptable, and a “7” being Exceptional. The following criteria will be measured:

Performance

- Professionalism; Safety; Client Interaction & Engagement; Problem Solving & Decision Making; COHMIS & OneHome; Radio Communications & Comprehension

Knowledge

- Heart Policy and Procedures; Mission, Vision, Values; COHMIS Policies; Confidentiality; Community Resources

Relationship

- Community Partners (Non-Profit/Faith-Based); Stakeholders (PD Municipalities/DCSO); Team

Uniform Dress Code

- A \$400 uniform stipend will be issued to each new HEART Navigator in their first paycheck.
- Every January, HEART Navigators will receive a \$400 uniform stipend in their paychecks.
- Field Work: HEART-issued polo-style shirts, hiking or cargo pants, jeans, shorts, plain black hat or HEART logo hat, closed-toe shoes, and jackets when weather permits. While in the field, the HEART logo must be displayed and visible on the outer layer of clothing on the back and the front of the clothing.
 - County-issued ballistic vests are available to the HEART when in the field and can be requested through the Douglas County Sheriff’s Office.
 - County-issued backpacks should contain an iPad or laptop, a flashlight, and a first aid kit.
- Office Work: Business casual attire
- Douglas County issued ID badges must be worn and visible at all times.

Co-Response

- Navigators are paired with deputies from the Douglas County Sheriff's Office and respond to law enforcement calls for service, public phone calls, community partner referrals, and proactively canvass the community to outreach unhoused individuals.
- The Deputy will make the initial contact to establish safety for the navigator and client.
- Law enforcement will address safety concerns, criminal infractions, code enforcement, or County ordinance violations, if applicable.
- The client's personal identification information can be shared within the unit so long the information is not obtained directly from COHMIS.
- The co-responder team can transport individuals to local food banks, train or bus stations, shelters, or other locations as needed so long individuals comply with safety and security measures established by DCSO. This could include a wants and warrants check, a pat down of a person, and a search of the individual's belongings.

On-Duty Shift Procedures

Referrals

- Referrals take priority over other duties and are generated to the HEART email inbox from the public, community partners, and law enforcement municipalities within Douglas County.
- Referrals will be assigned to the appropriate navigator and shall be addressed within 48 business hours. Once complete, the referral shall be placed in the navigator's email folder.
- Law Enforcement Referral: <https://survey123.arcgis.com/share/5721c0b89f0d4fa7802299c7d15738c5>
- Community Partner Referral: <https://survey123.arcgis.com/share/b7db69e78bf9449ebdcc8cab889d2a55>
- Public Referral: <https://survey123.arcgis.com/share/45725e102a6d48e5af7781c751b6e39b>
- HEART Phone Number: 303-660-7301

Navigator Responsibilities

- Responding to referrals from the public, community partners, and law enforcement.
- Answering calls and texts from the HEART phone line and returning any voicemails within 48 business hours.
- Responding to text messages from the public within 15 minutes.
- Ensuring client's information is protected when enrolling them into COHMIS.
- Scheduling follow-ups as needed.
- When HEART Deputies are unavailable, two navigators should be paired together for outreach activities. They shall log into the DCSO Shield Force Application and utilize their DCSO-issued radios during their shift.

Case Management

- Navigators will enter their daily activities in the Outreach Module under their specific profile within COHMIS.
- Once safety has been established, the navigator will enter the individual into COHMIS, if not already enrolled.
- If the individual wishes to remain anonymous, the navigator will add a private client.
- If the individual needs a funded service, they must be added to COHMIS and enrolled in HEART Street Outreach or HEART Emergency Hotel Voucher Program.
- If the individual needs a service that does not require funds to be used, they will be added to COHMIS under HEART Services and the one-time assistance will be logged.
- A HEART Program Participation Acknowledgement form is required to be filled out and signed by each household during enrollment.

- A CESA and Self-Sufficiency Assessment will be attempted with each active enrollment within 30 days of the initial contact. The navigator shall document the completion of both assessments or attempts to complete the assessments in COHMIS. If a household chooses not to complete the required assessments, staff should continue to foster trust and rapport while respectfully offering opportunities to complete the assessments at a later time.
- Through case management support, individuals are assisted in resolving their immediate basic needs while establishing housing plans. This includes aiding individuals in accessing emergency shelters, placement through Coordinated Entry, and utilizing emergency hotel vouchers, if available.
- Individuals enrolled in the HEART will obtain comprehensive case management services that include crisis intervention, assessments, and case planning with goals that focus on housing, income, and health and well-being. Case planning is developed to meet the needs of clients utilizing person-centered and strength-based methods.
- When interviewing clients, the navigator should apply appropriate individualized therapeutic approaches through trauma-informed care and motivational interviewing.
- The HEART Navigator will work in collaboration with other team members and community providers to aid in removing barriers to permanent housing such as acquisition of identification, benefits assistance, employment, behavioral and mental health support, and transportation.
- The HEART Navigator will uphold client relationships and activities toward goal attainment until individuals are safely housed, care is transferred to another provider, or if the individual chooses not to continue services.

Proactive Outreach by Geographic Areas

- Navigators shall connect with Municipal Law Enforcement Designees weekly to coordinate and facilitate responses to unhoused individuals within their areas.
- HEART units will canvass hot spots in their coverage areas weekly by utilizing various means of transportation.
- Utilize the Outreach Module within COHMIS to document locations of unsheltered individuals sleeping in their vehicles and those sleeping outside.
- Connect with businesses and/or landowners by providing the necessary tools and resources to address challenges regarding homelessness and panhandling.
- Engage community-based partners by identifying, reaching out to, and building relationships with local churches, non-profits, and other organizations. The HEART will formalize partnerships through collaborative planning, resource sharing, and ongoing communication to enhance the effectiveness of homeless outreach efforts.

REPORTING

Data Standards/Quality

Reporting to HUD on data quality for street outreach projects is limited to clients with a date of engagement. Therefore, navigators must record the engagement date and review all universal data elements for accuracy and completeness.

COHMIS Usage

Navigators are required to follow the COHMIS Policy and Procedure Manual when entering data into the COHMIS. This data consists of information on participants served and the types of supportive services provided by the HEART. Data resulting from COHMIS can inform program, agency, and communitywide planning to provide a broader evaluation that focuses on qualitative issues.

Program Evaluation

The HEART leadership team will review the following data monthly: number of individuals served, number of clients on By Name List, calls for service, online referrals, phone calls to HEART phone line, disposition of calls for service, and services provided

The HEART leadership team will review the following data annually: demographic data, number of clients on By Name List, housing outcomes, shelter outcomes, and Point in Time survey of Homelessness

This data will be used by the HEART leadership team to review program impact, adjust program operations, ensure achievement of outcomes, and make progress towards Functional Zero in Douglas County.

TERMINATION OF ASSISTANCE

Douglas County prioritizes the safety and well-being of all clients, staff, and stakeholders. HEART may terminate program assistance to clients for various reasons, including but not limited to threats to safety, illegal activity, disruptive behavior, and failure to engage.

Termination Procedure

- Documentation of Incidents: HEART must thoroughly document all incidents leading to potential termination, including the date, nature of violation, and any steps taken to address a client's behavior prior to termination of the client's program assistance.
- Verbal/Written Warnings: For a first infraction, clients may receive a verbal or written warning by staff that details the violation and the consequences of any continued behavior.
- Intervention and Support: Staff will offer interventions such as mediation, conflict resolution, or additional supportive services to help the client address issues before making a termination of program assistance decision.
- Emergency Termination: In cases of imminent risk to the safety of staff or stakeholders, staff may be required to make an immediate decision to terminate a client's program assistance.

GRIEVANCE

Douglas County is committed to fostering a respectful, inclusive, and supportive environment for all clients.

Clients may file a grievance for reasons including but not limited to:

- Perceived unfair or discriminatory treatment based on race, gender, age, sexual orientation, religion, disability, genetic information, or retaliation.
- Inappropriate or unprofessional behavior by staff.
- Concerns about program policies, rules, or services that negatively impact their well-being or ability to access services.
- Unmet service needs or unmet expectations around client care, support, or resources.

Grievance Procedure

- Informal Resolution: Before filing a formal grievance, clients are encouraged to resolve issues informally by discussing their concerns with their case managers. In many cases, open communication can resolve misunderstandings or minor concerns quickly. If the issue is not resolved through informal means or if the client prefers not to address it informally, the client may proceed by filing a formal grievance.
- Filing a Formal Grievance:
 - Timeframe: Clients have up to 30 days after the incident to file a grievance.
 - Submission: Grievances may be submitted in writing and include specific details including the date, nature of the incident, names of those involved (if known), and the desired resolution. Grievances should be submitted to the HEART Supervisor or Community Services Assistant Director.
 - Acknowledgment and Review: Upon receiving a grievance, the HEART Supervisor or Assistant Director will acknowledge receipt within three to five business days. A thorough review of the grievance will begin, including interviews with parties involved, review of relevant documents, and assessment of any available evidence.
 - Investigation and Resolution: The program will aim to resolve grievances within 10 - 15 business days of receipt. Complex grievances may require more time, in which case the client will be informed of the need for additional time and an updated timeline. After reviewing the grievance, a decision will be made, and the client will receive a written response outlining the findings, any actions taken, or reasons for denial if the grievance is not upheld.
 - Appeal Process: If the client is unsatisfied with the outcome of the grievance, they have the right to file an appeal within five to 10 business days of receiving the decision. The appeal will be reviewed by a higher-level supervisor who will assess the initial grievance process and decision. A final decision on the appeal will be communicated to the client within 10 - 15 business days.
 - Documentation: All grievances and related documentation, including the outcome and any corrective actions, will be kept in a secure and confidential grievance file. These records may be reviewed regularly to identify trends or areas for improvement in program operations and client care.

CONFIDENTIALITY

Douglas County does not tolerate the unauthorized use, copying, or dissemination of confidential information. Violation of this policy may result in removal of an employee from the COHMIS participation, termination of employment, or other legal action. In addition, Navigators shall follow all required COHMIS Statewide Policy and Procedures at all times.

Personally Identifiable Information (PII)

Personally identifying information (PII) refers to any information that can be used alone or in combination with other data to identify an individual. This includes, but is not limited to, personal details (such as name, date of birth, social security number or tax identification number), financial and employment information, medical and biometric data, photographs, and sensitive personal characteristics (such as race, ethnicity, disability status, immigration status, sexual orientation, gender identity, or religion).

Best Practices for PII

- The HEART program shall only request and collect PII that is required for program operations and must refuse or immediately destroy any PII that is not necessary. Staff must be trained in the proper collection, use, and protection of PII and consult a supervisor before responding to any PII requests.
- Staff must safeguard all PII that is in hard copy and electronic formats.
 - Staff must clearly label hard copy records and removable media, secure these items when not in use, and never leave these items unattended.
 - Staff MUST minimize electronic PII, store only in COHMIS, on secure network drives like the County O:drive, or authorized County cloud services in properly secured locations (for instance, Teams, SharePoint, and OneDrive for Business) and never save on local devices or unauthorized shared platforms (for instance, Google Drive, Dropbox). Staff must avoid emails and other electronic files containing PII whenever possible and permanently delete such files when no longer required .Staff must encrypt any PII that may be transmitted electronically, using an authorized County application (for instance, Encrypted Emails via M365 or Secured file sharing via OneDrive for Business) and addressing to specific recipients.
- Staff may only mail or fax PII as necessary and must be addressed to specific recipients using secure methods. Additional precautions apply when staff are working remotely, including staff prohibitions to print or save PII at home or on any personal device. All staff must follow approved two-step deletion procedures to permanently remove electronic PII.
- Staff must also follow the COCOHMIS Policy and Procedure Manual. Failure to comply may place staff and client information at risk.

Record Retention for Grants

Staff must follow state and federal retention timelines for grant award documentation, including but not limited to reports, beneficiary data, and similar records that document how an award has been used.

- According to US Treasury Terms and Conditions, section 4.c., State and Local Fiscal Recovery Funds (SLFRF records must be maintained for a period of 5 years after all grant funds have been expended or returned to Treasury. This means that these Records must be maintained for 5 years following the end of the period of performance. Both Division of Housing (DOH) and the US Treasury must be able to access these records at any point within that record retention period of 5 years. If litigation or an audit is started before the expiration of the retention period, the records must be retained until all litigation or audit findings have been resolved. The governing documents for this grant program may outline a variety of required periods for record retention, agencies shall comply with the longest records retention required, which is five years under the US Treasury’s Terms and Conditions for SLFRF funds.
- Douglas County staff must also follow the Douglas County Financial Records Policy for grant record retention.

FAIR HOUSING & NON-DISCRIMINATION

Discrimination in housing and housing-related services is prohibited. Staff must comply with the Colorado Fair Housing Act (C.R.S. § 24-34-501, et. seq.) and the Federal Fair Housing Act (Title 8).

- Douglas County does not exclude, deny benefits to, or otherwise discriminate against any person on the basis of race, ethnicity, color, national origin, disability, gender, veteran status, political beliefs, religion, sexual orientation, or age in admission to, participation in, or receipt of the services and benefits under any of its programs and activities, whether carried out by Douglas County directly or through a partner organization with which it arranges to carry out its programs and activities. This includes HEART staff.

- Reasonable accommodation must be provided for individuals with disabilities as required by law.
- Retaliation against individuals who assert fair housing rights is prohibited.

CONTACT INFORMATION

- **Tiffany Marsitto, Community Services Supervisor** at 720-219-5557; tmarsitto@douglas.co.us
- **Rand Clark, Assistant Director of Community Services** at 720-673-4116; rclark1@douglas.co.us
- **Melody D’Haillecourt, Community Programs Coordinator** at 303-303-4380; mdhaillecourt@douglas.co.us

ATTACHMENTS

1. Douglas County, Colorado Sub-Regional Quality By-Name List Inactive Policy
2. Douglas County Financial Records Policy
3. Douglas County Sheriff’s Office Radio Procedures and CAD Codes
4. HEART Data Decision Map
5. HEART Program Participation Acknowledgement
6. HEART Emergency Hotel Voucher Program
7. HEART Shelter Referral Policy
8. HEART Textline Policy
9. HEART Training Framework
10. Statewide HMIS Policies and Procedures

Douglas County, Colorado All Population Sub-Regional Quality By-Name List Inactive Policy

BACKGROUND

The Inactive Policy is a critical component of maintaining an accurate, real-time By-Name List (BNL). A reliable BNL ensures an equitable and efficient referral process is in place allowing the Homeless Engagement, Assistance and Resource Team (HEART), staff, and community partners to connect with households as soon as housing opportunities become available. Without this policy, progress toward functional zero for homelessness may be delayed due to time spent searching for households who cannot be contacted after repeated attempts. In some cases, households may have resolved their housing crisis on their own, entered an institution, or relocated to another community. The Inactive Policy creates a consistent approach for addressing these situations.

POLICY

The active BNL is reviewed during regularly scheduled Case Conferencing (CC) meetings where household status changes to 'inactive' are discussed. Households on the BNL are flagged and monitored by system coordinators, HEART, and community partners when they have not been seen for 60 days, despite 2 attempted contacts each month.

If a household has no contact with the Coordinated Entry (CE) system, HEART, or community partners for 60 days, and there have been at least two attempted contacts each month, with no services or shelter stays recorded in the Homeless Management Information System (HMIS) during that time, the household will be moved from the active BNL to the inactive BNL. When a household's location is unknown and they are moved to inactive status, their program enrollment in HMIS will be exited within 72 hours. For households with at least one Veteran, the sub-region in the HMIS enrollment screen must be updated prior to exit.

For those households that include at least one Veteran, sub-regional VA staff and Veteran Representatives access their Veteran specific and private systems/databases to check if households have re-located and/or have accessed VA services locally within the 60-day period. If a signed Release of Information (ROI) is in place at the time the household was moved to the 'inactive' BNL, local VA staff and Veteran representatives will provide pertinent information available.

If a household on the 'inactive' BNL re-engage with a community partner or HEART, they will be moved from the 'inactive' BNL to the 'active' BNL. Households that are fully reengaged may need a reassessment of their housing needs prior to a referral for housing opportunities.

Status changes from 'active' to 'inactive' may also occur in fewer than 60 days when verified absences are documented. Examples include diversion or prevention, illness or death, relocation, reunification with family, refusal of program participation, or self-resolution of the housing crisis.

Households entering an institution (e.g., jail or hospital), where they are expected to remain for 90 days (3 months) or fewer, households may remain on the 'active' BNL, depending on circumstances. In some cases, households may be referred to housing opportunities while in

the institution if they remain engaged with the system. If the household is no longer fully engaged upon release, they may be moved to the 'inactive' BNL on a case-by-case basis.

SECTION 13. FINANCIAL RECORDS

Records documenting and ensuring accountability for the receipt and expenditure of public funds.

General Instructions

- The minimum retention period applies to the record copy regardless of the storage format for the record (paper, electronic, microfilm, etc.).
- Unless otherwise specified in this retention schedule, duplicate copies may be destroyed at the discretion of the duplicate copy custodian provided they have no further administrative or other value. Duplicate copies should not be retained longer than the record copy.
- No record that is eligible for destruction under the retention schedule can be destroyed if it is pertinent to any anticipated, current or pending litigation, claim or audit or the subject of a legal hold.

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
1. ACCOUNTING RECORDS.		
A. Accounting – Reconciliations (Trial Balances). Reference copies of accounting system reports of the daily balance of all County accounts. Includes: <ul style="list-style-type: none"> ▪ Cash balance reports 	Finance Treasurer	2 years + current
B. Accounts Payable Records.	See: Accounts Payable Records below	
C. Accounts Receivable Records.	See: Accounts Receivable Records below	
D. Bounty Records.	See: Section 29 Recording Records – Historical Registers, Records and Books	
E. Ledgers and Journal Entries.		
1) General Ledger and Journals. Year-end summaries of receipts and disbursements by account and fund reflecting the general financial condition and operation of the County. May also include documentation from subsidiary ledgers to general ledger and accounting adjustments in the form of general entries.	Finance Treasurer	30 years

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
<p>2) Journal Entries and Supporting Detail. Includes analyses, summarizations, distributions, and other computations which support journal vouchers and entries; cash books (general and subsidiary or auxiliary books); daily or other periodic statements of receipts or disbursements of funds.</p>	Finance Treasurer	2 years + current <i>Duplicate Copies:</i> Until completion of audit
<p>2. ACCOUNTS PAYABLE RECORDS. Records that serve as documentation of the payment of bills by the County.</p>		
<p>A. Accounts Payable Monthly Reports (Copies). Listings of bills presented for payment authorization. Publication is required for the following:</p> <ul style="list-style-type: none"> ▪ Commissioners' Proceedings ▪ Financial statements 	Finance Original is recorded with County Clerk & Recorder	<i>Commissioners' Proceedings:</i> 6 years + current <i>Published (Copies) and Affidavits of Publication:</i> 6 years + current
<p>B. Bills, Invoices and Supporting Documentation. Records of bills paid by the County, including monthly credit and purchasing card statements and supporting documentation.</p>	Finance	6 years + current <i>Duplicate Copies:</i> 2 years + current
<p>C. Checks and Supporting Documentation.</p>	See: Treasurer Records below	
<p>D. Credit Card and Purchasing Card Issuance Records. Records of credit cards issued to the County and purchasing cards issued by the County.</p>	Finance	2 years + current after cancellation of card
<p>E. Expense Records. Records maintained to document travel, mileage, claims for travel, tuition and other reimbursements and other expenses of employees and officials while on County business, including requests, authorizations, etc.</p>	Finance	6 years + current <i>Duplicate Copies:</i> 2 years + current
<p>F. Petty Cash Requests. Records of petty cash fund account and requests for petty cash for various purposes.</p>	All Departments Retaining Petty Cash Records	2 years + current
<p>G. Vendor Records. Files maintained as a unit to track accounts payable activity for specific vendors, including information such as name and address, correspondence, copies of checks, W-9 and 1099 forms, etc.</p>	Finance See also: Purchasing Records – Vendor Lists below	<i>Vendor Files:</i> 6 years + current after closed <i>1099 Forms:</i> 4 years <i>W-9 Forms:</i> 3 years + current

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
3. ACCOUNTS RECEIVABLE RECORDS. Records that serve as the basis for collection of amounts owed by vendors, organizations and citizens having accounts with the County, and documentation of billing and collection of monies.		
A. Cash and Receipt Records and Reports.	See: Treasurer Records – Receipts for Monies Received by the Treasurer below	
B. Deposit Validation Records.	All Departments with Cash Registers	1 year + current after audit
C. Government Revenue Sharing Program Records - State. Records of allocation to and receipt by the County of revenues collected and/or allocated by the State for the following programs: <ul style="list-style-type: none"> ▪ Highway Users Tax Fund ▪ Conservation Trust Fund (Lottery) ▪ Severance tax ▪ Tobacco sales 	Finance Treasurer	6 years + current
D. Insufficient Funds Checks and Logs. Records of checks received by the County that are returned by banks for insufficient funds and logs of insufficient check transactions.	Finance Treasurer	Logs: 2 years + current Uncollectable Checks: 1 year + current after being written off
E. Open Accounts Receivable Records. Any indexes thereto and summaries of distribution.	Finance Treasurer	1 year + current
F. Requests, Vouchers and Supporting Documentation. Original requests, vouchers and supporting documents, including: <ul style="list-style-type: none"> ▪ Check requests ▪ EFT requests ▪ Receipt acknowledgements 	Finance Treasurer	6 years + current
4. AGREEMENTS, CONTRACTS AND SUPPORTING DOCUMENTATION.	See: Section 15 General Records – Agreements, Contracts and Supporting Documentation	
5. ASSESSOR RECORDS.	See: Section 1 Assessor Property Records	
6. AUDIT RECORDS.		
A. Audit Reports.		
1) Comprehensive Annual Financial Reports (CAFRs).	Finance Treasurer	Permanent

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
<p>2) External Audit Reports and Supporting Documentation. Reports of examinations and audits by accountants and auditors not in the regular employ of the County (such as reports of public accounting firms). Supporting documentation includes copies of audit work papers compiled for the audit.</p>	<p>Finance Treasurer See also: Grant Records below</p>	<p>Audit Reports: Permanent Audit Work Papers: 6 years + current after completion of audit</p>
<p>3) Internal Audit Reports and Supporting Documentation. Reports of examinations and audits by internal staff. Supporting documentation includes copies of audit work papers compiled for the audit.</p>	<p>Finance Treasurer</p>	<p>Audit Reports: 6 years after date of report, then evaluate for continuing value prior to destruction Audit Work Papers: 6 years + current after completion of audit</p>
<p>B. Audit Records – FEMA Disaster Reimbursement Audits. Audits and copies of financial records retained as work papers for FEMA audits in connection with disaster declarations and reimbursements.</p>	<p>Finance</p>	<p>Audit Reports: Permanent FEMA Audit Work Papers: 6 years from date of submission of final expenditure report or from date of quarterly or annual financial report</p>
<p>C. Audit Trail Records. Daily accounting system reports of completed transactions, used for internal audits. Transaction detail should include justification of any revenue in addition to expenditure activity.</p>	<p>All Departments Retaining Audit Trail Records Finance Treasurer</p>	<p>1 year + current</p>
<p>7. BANK RECORDS.</p>		
<p>A. Bank Statements and Reconciliations. Statements and daily bank reports from depositories showing details of funds received, disbursed, transferred, and balances on deposit.</p>	<p>Finance Sheriff's Office Treasurer</p>	<p>6 years + current</p>
<p>B. Check Records. Records relating to checks issued by the County, including check images, check registers and check stubs.</p>	<p>Finance Sheriff's Office Treasurer</p>	<p>6 years + current Treasurer's Duplicate Copies of Checks: 6 years + current</p>
<p>C. Deposit – Electronic Image.</p>	<p>Treasurer</p>	<p>25 months</p>
<p>D. Electronic Deposit Reports.</p>	<p>Treasurer</p>	<p>Until monthly reconciliation is complete</p>
<p>E. Trial Balances.</p>	<p>See: Accounting Records above</p>	
<p>8. BANKRUPTCY RECORDS.</p>		
	<p>See: Treasurer Records below</p>	

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
9. BOND ISSUE RECORDS. Records relating to bonded indebtedness, including revenue bond issues, special assessment bond issues, general obligation bond issues, private placement bonds, certificates of participation, lease-purchase and other types of debt transactions.		
A. Bond Issue Files. Usually include correspondence and general documentation, authorizations supporting financial arrangements, bond ratings, contracts or sales agreements, sample copies or specimens of bonds sold as evidence of County indebtedness, official statements, mathematical verifications, continuing disclosures, certificates of non-default to trustee, etc.	Finance	2 years + current after final payment
B. Bonds, Notes and Coupons Paid. Original canceled or redeemed bonds and coupons received from paying agents throughout the lifetime of the bond issue; cancelled upon receipt.	Trustee Administering Bond Registration Process	Follow Bond Registration Trustee's Retention Schedule
C. Bond Payment Records. Records of payments toward principal and interest.	Treasurer	2 years after final payment
D. Bond Proceedings Books. Certified record of proceedings relating to a bond issue, containing specimen (usually original) documents related to the approval process and issuance of bonds typically compiled in book form for presentation to the County by the bond agent or bond counsel.	Finance	30 years after maturity
E. Private Activity Bond Issue Files. Private activity bonds are debt instruments that are free from federal taxation and are typically used for affordable housing and industrial development funding; records include annual private activity ceiling allocation letters to County as a local issuing authority from State of Colorado, allocation assignment records, allocation declarations, transfers of allocations, bond issuance reports and all supporting documentation.	Finance See also: Section 25 Planning, Zoning and Land Use Records – Private Activity Bond Issue Files	2 years after final payment of bonds
10. BUDGET RECORDS.		
A. Annual County Budget. <ul style="list-style-type: none"> ▪ Preliminary proposed budget ▪ Final adopted budget ▪ Amendments 	Finance	Preliminary Budget: 1 year after adoption of budget Adopted Budget and Amendments: 100 years

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
<p>B. Departmental Budget Work Papers and Other Forecasts. Budgets and other forecasts prepared for internal administrative or operating purposes) of estimated future income, receipts and expenditures in connection with financing, construction and operations and acquisitions or disposals of properties or investments by the County, including revisions of such estimates and memoranda showing reasons for revisions; also records showing comparison of actual income and receipts and expenditures with estimates.</p>	All Departments Preparing Budget Requests	<p>Approved: 2 years + current</p> <p>Not Approved: 1 year + current</p>
<p>11. CORRESPONDENCE AND GENERAL DOCUMENTATION. Correspondence and documentation of a general nature.</p>	See: Section 15 General Records – Correspondence and General Documentation	
<p>12. FEE SCHEDULES. Fee schedules for fees charged by officers of the State are to be posted.</p>	Departments Collecting Fees	Retain current and previous fee schedules and associated supporting documentation
<p>13. FINANCIAL GUARANTEES, BONDS AND SUPPORTING DOCUMENTATION. Records relating to the acquisition and release of bonds of elected officials and various forms of financial guarantee required by the County from other parties to ensure performance, payments or the completion of certain specified actions, such as the completion of projects, required improvements or the payment of delinquent bills or assessments. Includes:</p> <ul style="list-style-type: none"> ▪ Bonds for elected officials ▪ Escrow accounts ▪ Letters of credit ▪ Liens ▪ Promissory notes 	<p>All Departments Retaining Financial Guarantees</p> <p>Note: Treasurer is custodian of bonds for the Clerk and Recorder, and Clerk and Recorder is custodian of bonds for other elected officials.</p> <p>See also: Section 29 Recording Records – Bonds of Elected Officials</p>	1 year after expiration, completion of guaranteed project (if applicable), release of the guarantee or after any legal proceedings involving enforcement of the bond conclude, whichever is later
<p>14. FIXED ASSET RECORDS.</p>	Finance	
<p>A. Depreciation Detail Records (Electronic).</p>	Finance	6 years + current
<p>B. Fixed Asset Records. Fixed asset records of County property (buildings and real estate), vehicles, equipment and furniture. Includes description, cost, date purchased, location, name of vendor and depreciation.</p>	Finance	<p>Paper Files: 6 years + current</p> <p>Electronic Tracking by Asset Code and Voucher Number: Until superseded</p>
<p>C. Inventories – Fixed Assets. Listings of expendable and nonexpendable property of the County, including buildings, real estate, vehicles, furniture, equipment, supplies and other items owned or administered by the County.</p>	All Departments Retaining Fixed Asset Inventories	Until superseded

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
15. FRANCHISE RECORDS.	See: Section 15 General Records – Agreements, Contracts and Supporting Documentation	
16. GRANT RECORDS. Files pertaining to applications for grants and the administration, monitoring and status of grants.		
A. Grants Given by County. Includes applications, grant awards, reports, and other supporting documentation, such as notices and notifications, staff reviews, monitoring reports on use of grant monies, etc.	All Departments Administering County Grant Programs	Awarded: Duration of grant + 6 years Rejected or Withdrawn: 2 years + current after rejection or withdrawal
B. Grants Received by County. Includes applications, grant awards, reports, and other supporting documentation, such as applications from those requesting funding from grant monies, notices and notifications, staff reviews, monitoring reports on use of grant monies, etc.	Administrative Files: Departments Administering Grants Financial Supporting Documentation: Finance	Federal Grants: 6 years from date of submission of final expenditure report or from date of quarterly or annual financial report Other Grants: Duration of grant + 6 years Records Relating to Real Property and Equipment Acquired with Federal Funds: 6 years after final disposition Rejected or Withdrawn: 2 years + current after rejection or withdrawal
17. INSURANCE RECORDS.	See: Section 30 Risk Management Records	
18. INVESTMENT RECORDS.		
A. Agreements and Contracts.	See: Section 15 General Records – Agreements, Contracts and Supporting Documentation	
B. Investment Instruments and Supporting Documentation. Includes any investment (internal or external) monthly reports, trade tickets, safekeeping reports, purchase and sale safekeeping confirmations and Treasurer authorization documentation.	Treasurer	6 years + current
C. Investment Statements and Reports.	Treasurer	6 years + current

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
<p>19. LOCAL IMPROVEMENT DISTRICT RECORDS. Records relating to local improvement districts, including:</p> <ul style="list-style-type: none"> ▪ Assessment Rolls (Copies) ▪ Financial Supporting Documentation ▪ Notices ▪ Receipts ▪ Releases of liens for paid assessments <p>Note: Releases of liens are recorded.</p>	<p>Finance Treasurer</p> <p>See also: Section 25 Planning, Land Use and Zoning – Local Improvement District (LID) Records</p>	1 year after maturity of the debt instruments
<p>20. MAILROOM RECORDS. Includes monthly mail reports setting forth cost breakdown, postage ledgers and postage meter records, and similar records.</p>	<p>Finance</p> <p>See also: Section 15 General Records – Mailing and Information Distribution Records</p>	2 years + current
<p>21. PAYROLL AND PERSONNEL RECORDS.</p>	See: Section 23 Payroll Records and Section 24 Personnel Records	
<p>22. PENSION RECORDS.</p>	See: Section 24 Personnel Records - Benefits	
<p>23. PROPERTY TAXATION RECORDS.</p>	See: Treasurer Records below and Section 1 Assessor Property Taxation Records	
<p>24. PURCHASING RECORDS.</p>		
<p>A. Auction Records.</p>	See: Section 14 Fleet and Equipment Records – Ownership Records	
<p>B. Bid Records.</p>		
<p>1) Bids, Proposals and Quotes. Includes:</p> <ul style="list-style-type: none"> ▪ Bid summaries of bids received in response to a specific solicitation ▪ Formal bids received unsolicited or in response to solicitations ▪ Proposals ▪ Vendor Lists ▪ Written quotes 	Purchasing	<p>Awarded: 6 years + current after acceptance of bid</p> <p>Rejected (Unsuccessful): 2 years + current after bid opening</p> <p>Unsolicited: 2 years + current</p> <p>Bid Summaries: 6 years + current</p>
<p>2) Bid Solicitations and Specifications. Includes:</p> <ul style="list-style-type: none"> ▪ Requests for proposals (RFPs) ▪ Requests for quotations (RFQs) ▪ Solicitations by the County for competitive bids, proposals or quotes ▪ Bid specifications 	Purchasing	<p>6 years + current</p> <p>Departmental Copies: 2 years + current</p>
<p>3) Copy Center Reports. Usage and chargeback reports.</p>	Finance	<p>Copy Center Usage Reports: 2 years + current</p> <p>Departmental Copier Chargeback Reports: 2 years + current</p>

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
<p>C. Purchasing Control Records. Includes:</p> <ul style="list-style-type: none"> ▪ Purchase orders ▪ Purchase request forms (purchase requisitions) ▪ Supporting documentation 	Purchasing	6 years + current <i>Duplicate Copies:</i> 2 years + current
<p>25. REBATE PROGRAMS. Records relating to rebate programs administered by the County; includes:</p> <ul style="list-style-type: none"> ▪ Correspondence ▪ Rebate applications ▪ Supporting documentation 	All Departments Administering Rebate Programs	6 years after rebate is paid
26. REPORTS AND PLANS – FISCAL.		
A. Annual Financial Reports.	See: Audit Records – Audit Reports – Comprehensive Annual Financial Reports (CAFRs) above	
B. Monthly Financial Reports – Treasurer.	See: Treasurer Records below	
27. REVENUE COLLECTION RECORDS.	See: Treasurer Records below	
28. SALES TAX RECORDS.		
<p>A. Sales Tax Reports and Forecasts. County reports forecasting future sales tax revenues and trends.</p> <p><i>Note:</i> State of Colorado collects sales tax for the County and maintains the sales and use tax returns. The County may self-collect sales and use tax at some point in the future. The County downloads sales and use tax information from the State system.</p>	Finance	<i>Sales Tax Reports:</i> 6 years + current <i>Forecasts:</i> 2 years + current
<p>29. TREASURER RECORDS. Records relating to the billing, collecting and disbursing of all real and personal property taxes for the County, school district, municipalities and special districts that levy in the County.</p>		
A. Accounting Records.	See: Accounting Records, Accounts Payable Records and Accounts Receivable Records above	
<p>B. Apportionment Records. Includes:</p> <ul style="list-style-type: none"> ▪ Apportionment sheets for County funds ▪ Apportionment of general school funds, towns and all special districts 	Treasurer	6 years + current
C. Bank Records.	See: Bank Records above	

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
D. Bankruptcy Records.		
1) Bankruptcy Case Logs. Logs containing summary information on bankruptcy court cases in which the County has filed claims for payment of taxes.	Treasurer	3 years + current
2) Bankruptcy Files and Indexes. Records documenting County claims for unpaid taxes against the assets of individuals and corporations involved in bankruptcy proceedings. Includes: <ul style="list-style-type: none"> ▪ Bankruptcy claims (copies) presented to Bankruptcy Court ▪ Payment schedules ▪ Spreadsheets 	Treasurer	Bankruptcy Files: 3 years + current after case is discharged or dismissed Bankruptcy File Indexes: Permanent
E. Bond Registers – General Obligation Bonds.	See: Bond Issue Records above	
F. Cash and Receipt Records and Reports.	See: Receipts for Monies Received by the Treasurer below	
G. Checks – All County Funds and Supporting Documentation. County checks and stubs that have been paid and cancelled by the Treasurer's office. Supporting documentation includes: <ul style="list-style-type: none"> ▪ Check and order registers ▪ Commissioners' Proceedings ▪ Monthly check reports, summaries of check transactions processed by the Treasurer 	Finance Treasurer See also: Bank Records above	6 years + current Duplicate Check Stubs: 6 years + current
H. Correspondence – Treasurer.	See: Section 15 General Records – Correspondence and General Documentation	
I. Delinquent Tax Records.	See also: Section 1 Assessor Property Taxation Records	
1) Affidavits of Posting and Publication – Delinquent Taxes.	Treasurer	Permanent (recorded with the Clerk and Recorder)
2) Mobile Home Distraint and Tax Lien Sale Files. Includes: <ul style="list-style-type: none"> ▪ Correspondence concerning redemptions ▪ Distraint warrants (copies) issued by the Treasurer for taxes due ▪ Notices of service by the Sheriff ▪ Certificates of Mobile Home Sale for Delinquent Taxes ▪ Other related records 	Treasurer	Permanent

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
3) Personal Property Tax Files. Includes: <ul style="list-style-type: none"> ▪ Certificates of Sale of Personal Property ▪ Correspondence with auctioneers and collection agencies ▪ Distraint warrants (copies) issued by the Treasurer for personal property taxes due ▪ Investigation reports ▪ Notices of sale of personal property ▪ Notices of service by the Sheriff ▪ Proofs of publication of notices ▪ Property inventories 	Treasurer	1 year + current
4) Redemption Certificates. Issued by the Treasurer for redemption of tax lien sale certificates.	Treasurer	6 years + current
5) Tax Deed Proceedings. Files containing documents and records pertaining to applications for Treasurer's tax deeds (not including Tax Lien Sale Certificates of Purchase or Treasurer's Tax Deed Notices).	Treasurer	6 years + current <i>Note:</i> Tax Deeds are recorded
6) Tax Lien Sale Record Books and Indexes. Listings and indexes of liens sold at the annual tax lien sale, showing names, addresses, legal descriptions, amounts sold at sale, purchasers, redemptions, and tax deeds issued.	Treasurer	Permanent
7) Unredeemed Certificates of Purchase and Assignments of Certificates of Purchase. Issued by the Treasurer to purchasers and assignees at the annual tax lien sale.	Treasurer	<i>Paid and Cancelled:</i> 6 years + current from date of redemption or issuance of tax deed, whichever is later <i>Unpaid and Uncollected:</i> 15 years + current <i>Outstanding Certificates Struck from Tax Roll:</i> 30 years + current
J. Investment Records.	See: Investment Records above	
K. Property Tax Records.		
1) Assessment Rolls, Adjustments, and Tax Dollar Warrants. Annual listings of all property subject to taxation certified by the Assessor, showing owners and descriptions and the property taxes due and paid on each property assessed. Includes assessment rolls for: <ul style="list-style-type: none"> ▪ Cities and towns ▪ County Funds ▪ Drainage districts ▪ Special improvement districts ▪ Taxing districts 	Treasurer See also: Section 1 Assessor Property Records – Administrative Reports	6 years + current

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
2) Board of Equalization Records.	See: Section 3 Board of County Commissioners Records – Board of Equalization	
3) Certificates of Property Taxes Due. Certifications of property taxes due on specified tax accounts.	Treasurer	10 years + current
4) Certifications of Levies and Revenue Reports. Report from the Board of County Commissioners to the Assessor and other entities certifying tax levies for all towns, cities, school districts and special districts within the County.	Finance	6 years + current
5) Delinquent Tax Records.	See: Delinquent Tax Records above	
6) Mass Payment Records. Correspondence, reports and supporting documentation submitted with tax payments covering multiple tax schedules.	Treasurer	1 year + current
7) Mobile Home Authentications. Copies of certifications that mobile home taxes have been paid that are used for movement permits and title applications.	Treasurer	10 years + current
8) Property Tax Revenue Limit. Taxing entities are allowed to increase their property tax revenue from the previous year by a maximum of 5.5%. Form is used for notification by the Division of Local Government (DOLA) of its calculation of the 5.5% property tax revenue limitation.	Finance	6 years + current
9) Public Disclosure Mill Levy Calculations – Law Enforcement Authorities. Annually, the Assessor certifies to each law enforcement authority in the County the total assessed value of all taxable property within the territorial limits of the authority and the mill levy that will generate the same property tax revenue as was generated in the previous year.	Finance	6 years + current
10) Tax Abatements Orders, Files and Worksheets. Orders and other records of property taxes abated and/or refunded; files and reports listing summary information concerning tax abatements.	Treasurer See also: Section 1 Assessor Property Taxation Records	Abatement Orders and Supporting Documentation: 6 years + current Abatement Files and Worksheets: 6 years + current

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
11) Tax Deferral Records. Copies of tax deferrals and supporting documentation, including correspondence.	Treasurer	1 year + current
12) Tax Distribution Records. Records showing property tax amounts distributed to taxing authorities, including school districts.	Treasurer	6 years + current
13) Tax Levy Rates. Listings of mill levies from taxing authorities used to calculate annual property taxes.	Treasurer	6 years + current
14) Tax Rolls. Assessment rolls of all taxable property within the County.	Treasurer	Permanent
L. Receipts for Monies Received by the Treasurer.		
1) Cash and Receipt Records and Reports. Records of cash receipts and disbursements, cash balances and bank account balances; copies of receipts for all monies received other than property taxes and Specific Ownership Taxes, including State Treasurer receipts; daily cash summary reports; and deposit registers showing the amounts deposited daily into each County account.	Treasurer See also: Treasurer Records – Receipts below	Treasurer's Cash Receipts Summary Records: 6 years + current Cash Receipts: 6 years + current Daily Cash Summary Reports: 6 years + current Deposit Registers: 6 years + current
2) Receipts – Paid Property Taxes (Except Delinquent). Copies of receipts for property taxes paid. Includes tax receipts for: <ul style="list-style-type: none"> ▪ Real estate ▪ Personal property ▪ Special assessments 	Treasurer	6 years + current from date of payment
3) Specific Ownership Tax.	Treasurer	1 year + current
M. Reports – Treasurer.		
1) Monthly Reports to Board of County Commissioners and Statements of Cash Receipts and Disbursements. Reports summarizing fees payments collected for the month.	Treasurer	6 years + current
2) Treasurer/Assessor Reports of Valuation changes. Summarizes all changes to the tax roll by taxing district. Includes abatements, BAA's, Assessor memos, Treasurer's memos and cancelled taxes.	Treasurer	6 years + current Note: Provided to the Colorado Division of Property Taxation annually

Douglas County – Records Retention Schedule

Record Title	Record Copy Custodian	Record Copy Minimum Retention Period
<p>30. WORKSHEETS – FINANCIAL. Documents such as rough notes, calculations or drafts assembled or created and used to prepare or analyze other documents; spreadsheets, worksheets, preparatory notes, tentative financial estimates and projections.</p>	<p>All Departments Creating Financial Worksheets</p>	<p><i>Worksheets in General:</i> Until no longer needed</p> <p><i>Worksheets with a Specific Fiscal Purpose (such as Human Services Monthly Worksheets):</i> 2 years + current after completion of State audit</p>

DOUGLAS COUNTY SHERIFF'S OFFICE		Patrol SOP
Operational Procedures and Guidelines		PAT-N-226
Radio Procedures and CAD Codes		
Effective Date: 05-21-25 Supersedes: 11-03-20	Approval: Division Chief	Number of Pages: 3
References: PAT-N-225	Reevaluation Date: Annually	Standards:

I. POLICY

Radio procedures and proper use of the radios are among the most critical aspects for the safety of all our officers. All officers will demonstrate proficiency and professionalism when using the radio. Officers will use simple, plain language and concisely state what they need or are requesting. When officers request additional officers to respond to their location, or when requesting a cover officer, they will use clear, concise language and make it very clear how they want the officer(s) to respond (i.e., normal response, code three, etc.).

II. CALL GENERATION / USE OF CAD MOBILE

When generating a call for service or incident, use verbiage to reflect the appropriate type of call or incident they are generating, such as “203 Adam traffic,” to initiate a traffic stop. Officers may also utilize CAD mobile to create an incident, so they do not tie up the radio. For officer safety and communication purposes, officers should ***not*** utilize CAD mobile for en-routing, generating, or entering disposition of priority one call, initiating traffic stops, or other contacts and circumstances where the officer’s full attention should be on what is going on around them and not on the computer.

III. BULLETIN REPORT (BR) / RADIO CODES:

The only codes that are still utilized are:

- BR-0 Officer hostage code (See [SOP PAT-N-225 Hostage Code](#))
- BR-4 No response
- CODE 3 Emergency Response
- CODE 6 Active Warrant on subject
 - Code 6 *MARY* – Misdemeanor Warrant
 - Code 6 *FRANK* – Felony Warrant
- CODE7 Meal Break
- CODE ADAM Subject is believed to be deceased.

IV. AIRTIME USE AND MONITORING

Keep unnecessary radio traffic off the main channel. If there is information that is not pertinent for everyone to hear, add the information to the mobile CAD notes for that incident. All radio traffic should be clear, professional, and concise. Officers should develop their radio ear to eliminate requesting information to be repeated and know what calls other deputies are on and their locations.

V. DISPOSITIONING CALLS / INCIDENTS

When calls or incidents, officers should again use plain language, such as “back in with a citation,” or “unable to locate” (do not say “UTL”). Officers should utilize verbiage to reflect actual dispositions utilized in CAD. Officers can also utilize CAD mobile to Dispo calls. CAD disposition codes are as follows:

- | | |
|----------------------------------|------------------------------------|
| CC - Call cancelled | NR - Not responding |
| CIT - CIT referral | OA - Turned over to another agency |
| CN - Contact notice left | PUR - Pursuit |
| DAR - Defensive action report | RE - In on a report |
| FA - False alarm | |
| TAG - Tagged abandoned vehicle | |
| FI - Field interview card | TT -Traffic ticket |
| IP - Increase Patrol | UTL -Unable to locate |
| NCA - No criminal activity | VW - Verbal warning |
| NE - No ECV used (Dispatch Only) | |
| WA - Warrant Arrest | WW -Written warning |

VI. PHONETIC ALPHABET

The standardized phonetic alphabet is used when spelling names / words or requesting license plate clearances to eliminate misunderstandings or miscommunication.

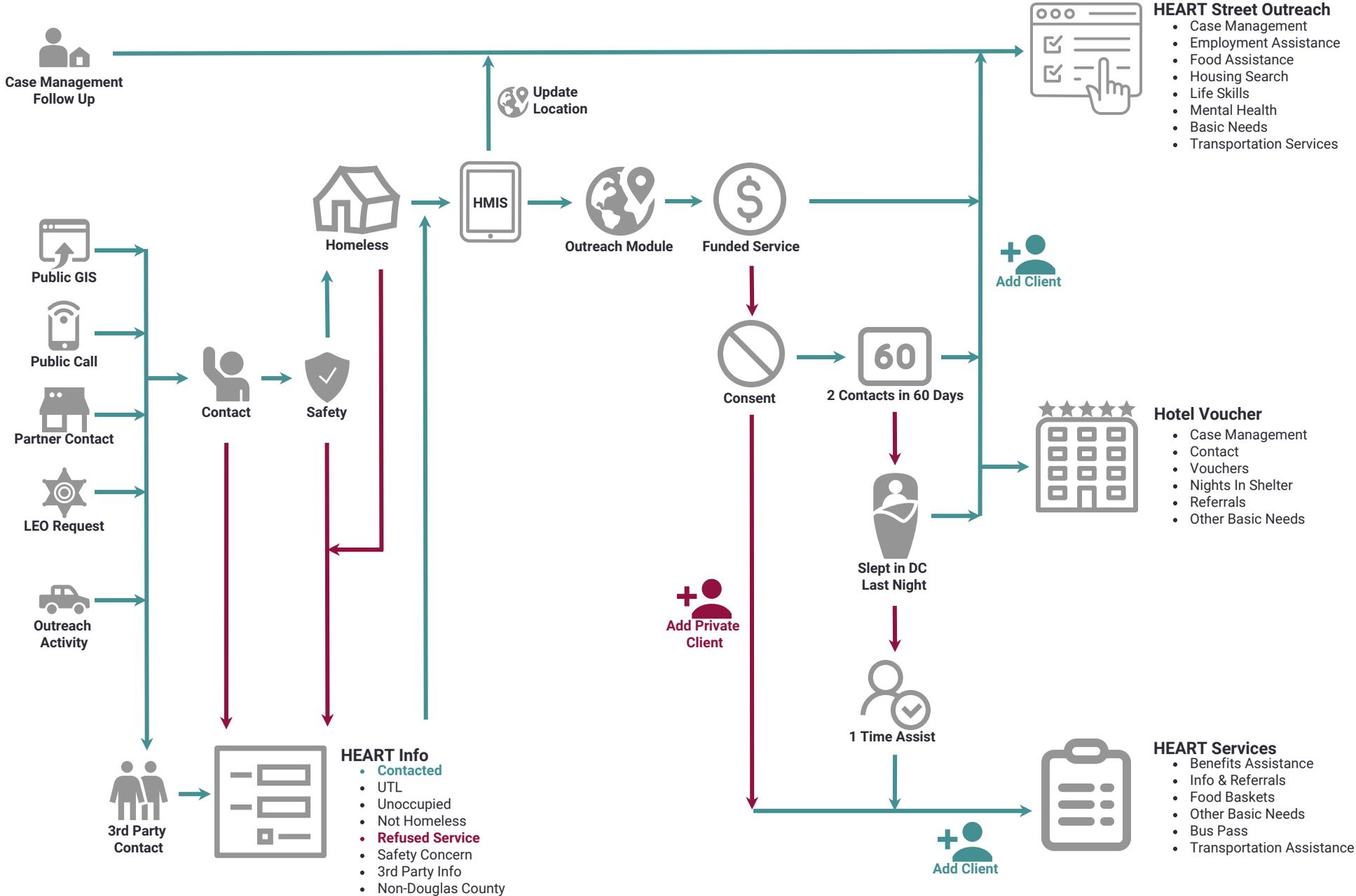
- | | | |
|-------------|-------------|-------------|
| A – Adam | J – John | S – Sam |
| B – Boy | K – King | T – Tom |
| C – Charles | L – Lincoln | U – Union |
| D – David | M – Mary | V – Victor |
| E – Edward | N – Nora | W – William |
| F – Frank | O – Ocean | X – X-ray |
| G – George | P – Paul | Y – Young |
| H – Henry | Q – Queen | Z – Zebra |
| I – Ida | R – Robert | |

VII. TACTICAL CHANNEL

DCSO 1 and DCSO 2 on office mobile and handheld radios are the primary channels for typical law enforcement radio traffic. They service the Douglas County Sheriff’s Office and other law enforcement agencies we provide contracted dispatching services. DCSO 3 and DCSO 4 are secondary alternate channels. DCSO 1, DCSO 2, DCSO 3, and DCSO 4 are all encrypted; any radio must have an encryption key to transmit or receive on those channels. The Douglas County Sheriff’s Office does not publish those keys and strictly controls who can access them.

DCSO Patrol personnel who are involved in events that require a lot of radio traffic, such as calls that require many cars to respond, calls that involve specialized services, or calls that will generate a protracted response, should consider taking their radio traffic to DCSO 3. Doing so ensures continuity of operations on the main channel.

The scene supervisor should coordinate with the dispatch supervisor to determine whether splitting the channels is practical; Dispatch may be able to dedicate a dispatcher to that channel if their staffing permits.



HEART PROGRAM PARTICIPANT ACKNOWLEDGEMENT

PROGRAM OVERVIEW

The Homeless Engagement, Assistance and Resource Team (HEART) pairs civilian navigators with local law enforcement to compassionately engage people experiencing homelessness in Douglas County. Navigators assess needs and vulnerability, provide case management, and connect individuals to appropriate community resources.

EMERGENCY HOTEL VOUCHERS

The HEART Emergency Hotel Voucher Program (EHVP) requires that all applicants sign this Participant Acknowledgment form. The following conditions and limitations apply:

1. Participants must be experiencing homelessness as defined by the following Federal criteria:
 - a. Unsheltered (literal) homeless;
 - b. Imminently homeless;
 - c. Unaccompanied youth; or
 - d. Victim of domestic violence
2. Participants must have an income at or below 30% of the Area Median Income (AMI)
3. Assistance is limited to a one-night stay in an authorized hotel
4. A HEART Navigator will be assigned to follow up with the participant the next morning prior to check out to develop and implement a plan to secure shelter or housing
5. Each household is limited to a total of not more than three nights of hotel vouchers per year
6. Households engaged with the HEART Navigator and have a defined plan to address their shelter and housing needs will be prioritized
7. Limited to funding availability

Participants are solely responsible for any incidental charges associated with the hotel stay including, but not limited to, additional pet fees, hotel services such as food and beverages, entertainment costs, and damages. Failure to check out in a timely manner may result in additional fees including legal action.

DUPLICATION OF BENEFITS

Please indicate whether you or any member of your household has applied for or received financial assistance, hotel/motel vouchers, or similar support from any other source within the past 12 months.

No. I certify that neither I nor anyone in my household has applied for or received other assistance for the same purpose.

Yes. I or a household member has applied for or received assistance. If yes, please complete the table below.

Assisting Agency	Type of Assistance	Amount or Nights	Date(s) Received

FAIR HOUSING AND NON-DISCRIMINATION

Douglas County complies with the Colorado Fair Housing Act (C.R.S. §§ 24-34-501–509) and the Federal Fair Housing Act. Discrimination in housing and housing-related services is prohibited. Douglas County does not exclude, deny benefits to, or otherwise discriminate against any person on the basis of race, ethnicity, color, national origin, disability, gender, veteran status, political beliefs, religion, sexual orientation or age in admission to, participation in, or receipt of the services and benefits under any of its programs and activities, whether carried out by Douglas County directly or through a partner organization with which it arranges to carry out its programs and activities. Reasonable accommodations shall be provided to individuals with disabilities as required by law. Retaliation against individuals who assert fair housing rights or file complaints is prohibited.

GRIEVANCE

Douglas County is committed to fostering a respectful, inclusive, and supportive environment for all clients. Any client who feels they have been treated unfairly has experienced inappropriate action by staff, or who has concerns about the program’s operations or safety, has the right to file grievance without fear of retaliation or discrimination. Grievances may be submitted in writing and include specific details including the date, nature of the incident, names of those involved (if known), and the desired resolution. Grievances may be submitted to the HEART Supervisor or Community Services Assistant Director by email at Heart@douglas.co.us or by phone at (303) 660-7301.

TERMINATION OF ASSISTANCE

Douglas County prioritizes the safety and well-being of all clients, staff, and stakeholders. Clients may be terminated from the program for reasons including but not limited to threats to safety, illegal activity, disruptive behavior, or failure to engage. Participants may be removed from the program for providing false information to Douglas County.

If you have questions regarding the terms of this agreement you are encouraged to consult with legal counsel.

Head of Household Signature: _____

Printed Name: _____ Date: _____

I waive my right to receive a copy of this document.

I request a copy of this document.

The HEART Policy and Procedure Manual can be found on our website: <https://www.douglas.co.us/homeless-initiative/heart/>

HEART Emergency Hotel Voucher Program

PROGRAM OVERVIEW

The Homeless Engagement Assistance and Resource Team (HEART) is a co-responder team that pairs a homeless navigator with local law enforcement to support individuals experiencing homelessness. Douglas County utilizes the regional shelter system to assist those experiencing homelessness. Providing limited, emergency hotel vouchers will help provide emergency shelter when no other suitable shelter is accessible. HEART navigators will address additional barriers including transportation, lack of documentation, pets, etc. and connect the recipient to other appropriate services.

ELIGIBILITY REQUIREMENTS

The eligibility requirements to qualify for the HEART Emergency Hotel Voucher Program (EHVP) include homeless status and income.

Homeless Status

Individuals or families must experience at least one of the following categories as defined by the Department of Housing and Urban Development (HUD) to be considered literally homeless:

Category 1: Unsheltered (Literal) Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- An individual or family with a primary night-time residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground
- Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals)
- An individual who is exiting an institution where they resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2: Imminently Homeless

An individual or family who will imminently lose their primary nighttime residence provided that:

- The primary night-time residence will be lost within 14 days of the date of application for homeless assistance
- No subsequent residence has been identified
- The individual or family lacks resources or support networks (e.g., friends, family, faith-based or other social networks), necessary to obtain other permanent housing

Category 3: Youth and Families

Unaccompanied youth under 25 years of age or families with children and youth who do not otherwise qualify as homeless under this definition, but:

- Share the housing of other persons due to loss of housing, economic hardship, or a similar reason
- Live in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance
- Have experienced persistent instability as measured by two or more moves during the 60-day period immediately preceding the date of applying for homeless assistance and

- Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment

Category 4: Domestic Violence

Any individual or family who is:

- Fleeing or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence
- Has no other residence
- Lack the resources or support networks (e.g. family, friends, faith-based or other social networks, to obtain other permanent housing)

Income Requirements

EHVP participants must certify their household income is at or below 30% Area Median Income (AMI)(See chart below):

HH Size	1	2	3	4	5	6	7	8
2025 Below 30% AMI	\$29,450	\$33,650	\$37,850	\$42,050	\$45,450	\$48,800	\$52,150	\$55,550

Income chart will be updated periodically as required by applicable grant funder.

ELIGIBLE SERVICES

The EHVP provides hotel vouchers when no other suitable emergency shelter resource is available in the community where the participant is located. HEART Navigators will be available to meet with the participant the following day prior to check out to develop a plan to access ongoing shelter or housing services. See “Limits” below for more information.

Authorized Hotels

- Comfort Suites Highlands Ranch, 303-770-5400, 7060 E County Line Rd, Highlands Ranch, CO 80126
- Rock View Hotel Castle Rock, 303-688-0880, 1020 Park St., Castle Rock, CO 80109
- LaQuinta Parker, 720-716-3622, 17111 Carlson Dr., Parker, CO 80134
- Extended Stay Lone Tree, 303-662-1511, 8752 S Yosemite St, Lone Tree, CO 80124

Additional hotels may be considered. Please contact Melody D’Haillecourt, Community Programs Coordinator for authorization at mdhaillecourt@douglas.co.us .

Limits

The EHVP is intended to be a bridge to accessing emergency shelter or other housing. Therefore, hotel vouchers will be limited to single night of stay at one time. If no HEART Navigator is scheduled to be available the following day, additional nights may be considered. There shall be not more than three total nights of hotel stay per household, per calendar year. Exceptions may be made on a case-by-case basis with approval by Community Services Management.

Those who are actively engaged with the HEART Navigator and have a defined plan to address their shelter and housing needs will be prioritized.

Service Area

The EHVP will focus on serving those who are unhoused in Douglas County, Colorado. In addition, individuals referred to HEART through the regional Coordinated Entry Systems (CES) may be served if funding is available.

STAFF PROGRAM PROCEDURES

General Operating Procedures

Eligibility determination:

1. Evidence of eligible homelessness status will be obtained in the following order of priority:
 - Intake worker observation
 - Self-certification
 - Third-party documentation

Lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by HEART.

2. Self-certification of income at or below 30% AMI

Required Data: All data and documentation shall be stored securely in digital or paper form as required by County Data Retention Policy or as required by the grant funds.

The following data is required:

- First and Last Name
- Phone or Email Address
- Social Security Number
- Date of Birth
- Gender
- Race and Ethnicity
- Veteran Status
- Homeless Status
- Income
- Name of Hotel
- Cost of Hotel
- Receipt of Payment
- COHMIS Release of Information
- Program Participation Acknowledgement

Payment of funds: Payments of hotel vouchers will be made directly to the participating hotel utilizing issued purchase cards. No funds may be paid directly to participants. All documentation, including receipts, must be collected and submitted in this manual. A County Tax Exempt Certificate should be provided to the hotel and County Purchase Card

Policy must be followed at all times.

HEART Navigator Procedures

HEART Navigators should be the primary point of engagement for disbursing hotel vouchers. Navigators should work diligently to ensure that no other suitable shelter opportunity is available. The HEART Navigator will utilize the County issued credit card to make payment. All vouchers paid using a County issued purchase card must be submitted for financial approval as required by County Policy. The HEART Navigators shall:

- Complete Colorado Homeless Management Information System (COHMIS) enrollment
- Determine if participant qualifies as literal homeless
- Determine if participant's income is at or below 30% AMI
- Complete HEART Hotel Voucher Program enrollment in HMIS
- Enter service data in HMIS
- Have participant complete HEART Program Participant Acknowledgment Form and save in COHMIS client file
 - The HEART Program Participant Acknowledgement Form outlines key program components, including: an overview of the HEART Program, EHVP acknowledgement, attestation regarding duplication of benefits, Fair Housing and Non-Discrimination requirements, grievance procedures, and termination of assistance
- Complete COHMIS Client Consent for Data Collection and Release of Information
- Complete a Self-Sufficiency Matrix Assessment in COHMIS within the first 30 days of enrollment
- Submit copy of hotel receipt or folio, with the COHMIS Client ID, by email to HEART@douglas.co.us prior to the end of the shift
- HEART Navigators will follow up with client prior to check out the following morning

OneHome Coordinated Entry System

The OneHome Coordinated Entry System (Coordinated Entry) is a client-centered process that assesses and identifies the housing needs of those who are unhoused. Coordinated Entry matches individuals, youth, and families to the appropriate available housing resources while promoting client choice. Coordinated Entry Assessments (CESA) should be offered to individuals within the first 30 days of enrollment and documented in COHMIS. If an individual or household declines the CESA, staff should re-offer the assessment at a later date and document all accepted or declined offers in COHMIS.

- OneHome CESA Tool: Assessment that determines an individual's level of vulnerability
 - CESA for Single Adults should be completed with individuals aged 24 and older.
 - CESA for Families should be completed with individuals with children and/or spouses.
 - CESA for Transition Age Youth should be completed with individuals aged 18-24 years old.
- Veteran Assistance
 - Clients who are identified as prior military should be added to the Veteran By Name List (BNL) through OneHome within COHMIS during the initial intake.
 - Once a Veteran is actively enrolled to the BNL they are identified as being literally homeless*, and staff should immediately complete a CESA if the Veteran wants to be prioritized for housing resources. (*Defined above under "Homeless Status").

HEART Deputies Procedures

If no Navigator is available, HEART deputies may provide hotel vouchers during normal HEART hours of operation utilizing DCSO issued purchase card. All required paperwork must be submitted as outlined and emailed to HEART@douglas.co.us. The HEART Deputies shall:

- Determine if participant qualifies as literal homeless
- Determine if participant's income is at or below 30% AMI
- Check EHVP Program Maximum document in Sharepoint to ensure participant has not reached the maximum nights of hotel
- If eligible, complete HEART Hotel Voucher Program Application
- Have participant complete HEART Emergency Hotel Voucher Program Participant Acknowledgment
- Have participant complete COHMIS Client Consent for Data Collection and Release of Information
- Submit the following paperwork by email to HEART@douglas.co.us prior to the end of the shift:
 - Program Application
 - Program Acknowledgment
 - COHMIS Consent
 - Hotel receipt or folio

A HEART Navigator will be assigned to follow up with the participant to assess the situation, provide resources and develop a plan to secure shelter or housing. The HEART Navigator assigned should ensure that all participant information has been entered into HMIS as required.

The Community Programs Coordinator will review emailed documentation for completeness and accuracy. All paperwork will be emailed to the designated DCSO Administrative Staff with authorization to charge expense to the EHVP grant business unit. DCSO staff will be responsible for accurate reporting in purchase card system.

DCSO After-Hours Procedures

Hotel vouchers requested through the DCSO after normal HEART hours of operation may be authorized by the DCSO Watch Commander and paid using a DCSO issued purchase card. All required paperwork must be submitted as outlined in the attached DCSO After Hours Authorization Check List and emailed to HEART@douglas.co.us by the end of the shift. DCSO shall:

- Determine if participant qualifies as literal homeless
- Determine if participant's income is at or below 30% AMI
- Check EHVP Program Maximum document in Sharepoint to ensure participant has not reached the maximum nights of hotel
- If both homeless status and income has been verified, complete HEART Hotel Voucher Program Application
- Have participant complete HEART Emergency Hotel Voucher Program Participant Acknowledgment
- Have participant complete COHMIS Client Consent for Data Collection and Release of Information
- After Hours Authorization must be signed by DCSO Watch Commander
- Submit completed paperwork as follows by email to HEART@douglas.co.us prior to the end of the shift:
 - Program Application
 - Program Acknowledgment
 - COHMIS Consent
 - Hotel receipt or folio

A HEART Navigator will be assigned to follow up with the participant the next morning to assess the situation, provide resources and develop a plan to secure shelter or housing. The HEART Navigator assigned should ensure that all participant information has been entered into HMIS as required.

The Community Programs Coordinator will review emailed documentation for completeness and accuracy. All paperwork will be emailed to the designated DCSO Administrative Staff with authorization to charge expense to the EHVP grant business unit. DCSO staff will be responsible for accurate reporting in purchase card system.

REPORTING

The Community Programs Coordinator will be responsible for ensuring accuracy and completeness of all required documentation. Additionally, the Program Coordinator will be responsible for completing and submitting required reports and reimbursement requests to grant funders and other stakeholders as required.

Data Standards/Quality

Reporting to HUD on data quality for street outreach projects is limited to clients with a date of engagement. Therefore, navigators must record the engagement date and review all universal data elements for accuracy and completeness.

COHMIS Usage

Navigators are required to follow the COHMIS Policy and Procedure Manual when entering data into the COHMIS. This data consists of information on participants served and the types of supportive services provided by the HEART. Data resulting from COHMIS can inform program, agency, and communitywide planning to provide a broader evaluation that focuses on qualitative issues.

TERMINATION OF ASSISTANCE

Douglas County prioritizes the safety and well-being of all clients, staff, and stakeholders. HEART may terminate program assistance to clients for various reasons, including but not limited to threats to safety, illegal activity, disruptive behavior, and failure to engage.

Termination Procedure

- Documentation of Incidents: HEART must thoroughly document all incidents leading to potential termination, including the date, nature of violation, and any steps taken to address a client's behavior prior to termination of the client's program assistance.
- Verbal/Written Warnings: For a first infraction, clients may receive a verbal or written warning by staff that details the violation and the consequences of any continued behavior.
- Intervention and Support: Staff will offer interventions such as mediation, conflict resolution, or additional supportive services to help the client address issues before making a termination of program assistance decision.
- Emergency Termination: In cases of imminent risk to the safety of staff or stakeholders, staff may be required to make an immediate decision to terminate a client's program assistance.

GRIEVANCE

Douglas County is committed to fostering a respectful, inclusive, and supportive environment for all clients.

Clients may file a grievance for reasons including but not limited to:

- Perceived unfair or discriminatory treatment based on race, gender, age, sexual orientation, religion, disability, genetic information, or retaliation.
- Inappropriate or unprofessional behavior by staff.
- Concerns about program policies, rules, or services that negatively impact their well-being or ability to access services.
- Unmet service needs or unmet expectations around client care, support, or resources.

Grievance Procedure

- **Informal Resolution:** Before filing a formal grievance, clients are encouraged to resolve issues informally by discussing their concerns with their case managers. In many cases, open communication can resolve misunderstandings or minor concerns quickly. If the issue is not resolved through informal means or if the client prefers not to address it informally, the client may proceed with filing a formal grievance.
- **Filing a Formal Grievance:**
 - **Timeframe:** Clients have up to 30 days from the incident to file a grievance.
 - **Submission:** Grievances may be submitted in writing and include specific details including the date, nature of the incident, names of those involved (if known), and the desired resolution. Grievances should be submitted to the HEART Supervisor or Community Services Assistant Director.
 - **Acknowledgment and Review:** Upon receiving a grievance, the HEART Supervisor or Assistant Director will acknowledge receipt within three to five business days. A thorough review of the grievance will begin, including interviews with parties involved, review of relevant documents, and assessment of any available evidence.
 - **Investigation and Resolution:** The program will aim to resolve grievances within 10 - 15 business days of receipt. Complex grievances may require more time, in which case the client will be informed of the need for additional time and an updated timeline. After reviewing the grievance, a decision will be made, and the client will receive a written response outlining the findings, any actions taken, or reasons for denial if the grievance is not upheld.
 - **Appeal Process:** If the client is unsatisfied with the outcome of the grievance, they have the right to file an appeal within five to 10 business days of receiving the decision. The appeal will be reviewed by a higher-level supervisor who will assess the initial grievance process and decision. A final decision on the appeal will be communicated to the client within 10 - 15 business days.
 - **Documentation:** All grievances and related documentation, including the outcome and any corrective actions, will be kept in a secure and confidential grievance file. These records may be reviewed regularly to identify trends or areas for improvement in program operations and client care.

CONFIDENTIALITY

Douglas County does not tolerate the unauthorized use, copying, or dissemination of confidential information. Violation of this policy may result in removal of an employee from the COHMIS participation, termination of employment, or other legal action. In addition, Navigators shall follow all required COCOHMIS Statewide Policy and Procedures at all times.

Personally Identifiable Information (PII)

Personally identifying information (PII) refers to any information that can be used alone or in combination with other data to identify an individual. This includes, but is not limited to, personal details (such as name, date of birth, social security number or tax identification number), financial and employment information, medical and biometric data, photographs, and sensitive personal characteristics (such as race, ethnicity, disability status, immigration status, sexual orientation, gender identity, or religion).

Best Practices for PII

- The HEART program shall only request and collect PII that is required for program operations and must refuse or immediately destroy any PII that is not necessary. Staff must be trained in the proper collection, use, and protection of PII and consult a supervisor before responding to any PII requests.
- Staff must safeguard all PII that is in hard copy and electronic formats.

- Staff must clearly label hard copy records and removable media, secure these items when not in use, and never leave these items unattended.
- Staff MUST minimize electronic PII, store only in COHMIS, on secure network drives like the County O:drive, or authorized County cloud services in properly secured locations (for instance, Teams, SharePoint, and OneDrive for Business) and never save on local devices or unauthorized shared platforms (for instance, Google Drive, Dropbox). Staff must avoid emails and other electronic files containing PII whenever possible and permanently delete such files when no longer required. Staff must encrypt any PII that may be transmitted electronically, using an authorized County application (for instance, Encrypted Emails via M365 or Secured file sharing via OneDrive for Business) and addressing to specific recipients.
- Staff may only mail or fax PII as necessary and must be address to specific recipients using secure methods. Additional precautions apply when staff are working remotely, including staff prohibitions to print or save PII at home or on any personal device. All staff must follow approved two-step deletion procedures to permanently remove electronic PII.

Staff must also follow the COHMIS Policy and Procedure Manual. Failure to comply may place staff and client information at risk.

Record Retention for Grants

Staff must follow state and federal retention timelines for grant award documentation, including but not limited to reports, beneficiary data, and similar records that document how an award has been used.

- According to US Treasury Terms and Conditions, section 4.c., State and Local Fiscal Recovery Funds (SLFRF records must be maintained for a period of 5 years after all grant funds have been expended or returned to Treasury. This means that these Records must be maintained for 5 years following the end of the period of performance. Both Division of Housing (DOH) and the US Treasury must be able to access these records at any point within that record retention period of 5 years. If litigation or an audit is started before the expiration of the retention period, the records must be retained until all litigation or audit findings have been resolved. The governing documents for this grant program may outline a variety of required periods for record retention, agencies shall comply with the longest records retention required, which is five years under the US Treasury’s Terms and Conditions for SLFRF funds.
- Douglas County staff must also follow the Douglas County Financial Records Policy for grant record retention.

FAIR HOUSING & NON-DISCRIMINATION

Discrimination in housing and housing-related services is prohibited. Staff must comply with the Colorado Fair Housing Act (C.R.S. § 24-34-501, et. seq.) and the Federal Fair Housing Act (Title 8).

- Douglas County does not exclude, deny benefits to, or otherwise discriminate against any person on the basis of race, ethnicity, color, national origin, disability, gender, veteran status, political beliefs, religion, sexual orientation, or age in admission to, participation in, or receipt of the services and benefits under any of its programs and activities, whether carried out by Douglas County directly or through a partner organization with which it arranges to carry out its programs and activities. This includes HEART staff.
- Reasonable accommodations must be provided for individuals with disabilities as required by law.
- Retaliation against individuals who assert fair housing rights is prohibited.

CONTACT INFORMATION

Tiffany Marsitto, Community Services Supervisor

720-219-5557

tmarsitto@douglas.co.us

Rand Clark, Assistant Director of Community Services

720-673-4116

rclark1@douglas.co.us

Melody D'Haillecourt, Community Programs Coordinator

303-303-4380

mdhaillecourt@douglas.co.us

ATTACHMENTS:

1. HEART Emergency Hotel Voucher Program Application
2. HEART Program Participant Acknowledgement
3. COHMIS Release of Information
4. DCSO After-Hours Authorization Check List
5. Douglas County Financial Records Policy
6. Douglas County Purchase Card Policy

DOUGLAS COUNTY HEART SHELTER REFERRAL POLICY

This policy provides guidelines for the Douglas County Homeless, Engagement, Assistance, and Resource Team (HEART) when navigating individuals to shelters. These guidelines provide an overview of the program, define appropriate shelters, and set procedures when connecting individuals to local shelter resources.

PROGRAM OVERVIEW

Resource navigation is provided by the HEART to assist people working to obtain both emergency and referral-based shelter. Connection to appropriate case management within the shelters is encouraged for continuity of Care.

APPROVED SHELTER DEFINITION

- Any shelter that is listed on the U.S. Department of Housing and Urban Development website; or
- Any shelter registered in the 2-1-1 database operated by Mile High United Way.
- Emergency Hotel Voucher Program operated by a local non-profit or government entity.

SHELTER DEFINITIONS

- Emergency Shelter: Any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless.
- Transitional Shelter: Programs that provide temporary residence ranging from six to 24 months for people experiencing homelessness that include supportive services to improve employability to further help the individual obtain permanent housing.
- Domestic Violence: A safe shelter at a confidential location for individuals and families who are seeking refuge from intimate-partner violence.

PROCEDURES FOR PROGRAM ENROLLMENT AND DOCUMENTATION

All services and referrals shall be recorded in HMIS. HMIS data standards and data decision-making requirements should be followed at all times. All individuals who meet the following criteria should be entered into HIMS and enrolled in HEART Street Outreach:

- If service is funded by HEART (hotel voucher, donated funds, etc) or partner agency; or
- If this is the 2nd contact in the previous 60 days by HEART; or
- The person slept in Douglas County the previous night; or
- Likely to be an ongoing client (i.e. housing search); then

If the person does not provide consent to share their information in HMIS, mark it as Private and mark “no consent” (certain information is still required to be entered into HMIS).

Services

- Within HMIS, the navigator will select “Referral to Shelter” under Case Management Services.
- Documentation under this service must include the name of the shelter and the name(s) of any case managers that were connected to the individual obtaining shelter.

REPORTING

Quarterly program reports will be created by County Staff to track progress with individuals obtaining shelter, connection with the appropriate case management within the approved shelter and monitor program activities.

NON-DISCRIMINATION POLICY

Douglas County does not exclude, deny benefits to, or otherwise discriminate against any person on the basis of race, ethnicity, color, national origin, disability, gender, veteran status, political beliefs, religion, sexual orientation or age in admission to, participation in, or receipt of the services and benefits under any of its programs and activities, whether carried out by Douglas County directly or through a Partner Agency with which it arranges to carry out its programs and activities.

COUNTY CONTACT INFORMATION

Tiffany Marsitto, Community Services Supervisor

720.219.5557

Tmarsitto@douglas.co.us

Rand Clark, Assistant Director of Community Services

720.245.0718

RClark1@douglas.co.us

DOUGLAS COUNTY HEART TEXTLINE POLICY

This policy provides guidelines for the Douglas County Homeless, Engagement, Assistance, and Resource Team (HEART) when receiving and responding to text messages through the Textline application. These guidelines provide purpose for the application, appropriate usage, response expectations, and compliance.

PURPOSE

This policy outlines how staff should use TextLine to provide quick, professional responses to the public. TextLine makes it easier for citizens to reach HEART Navigators and efficiently support those who are unhoused. The goal is to support clear, timely communication that connects people to services as quickly as possible.

PLATFORM USAGE

- Navigators are permitted to only respond to inquiries initiated by the public or those seeking services.
- TextLine may NOT be used by HEART Navigators to initiate a conversation or be used in any way that could be considered as marketing or promotion of the HEART or its programs.
- Navigators must be available within the TextLine application to respond to text messages while working their scheduled shift.

TEXTLINE APPLICATION USAGE GUIDELINES

- Access the Application: Open the TextLine application on your county-issued cell phone, iPad, and/or desktop.
- Set Availability: Click on user initials on the upper right-hand corner of screen and change profile status to “Available.”
- View Conversations: Navigate to the left-hand conversation pane to review the list of ongoing text threads.
- Identify Unclaimed Messages: Messages that do not display a green checkmark icon are unassigned and available for claiming.
- Claim a Conversation: Select the message thread to manage and click the “claim” button to assign.
- Confirmation of Claim: Once claimed, a notification will appear in the conversation list confirming the assignment.
- Transfer a Conversation (if needed): If unable to continue managing a conversation, click the “Transfer” button to reassign it to another Navigator or Supervisor.
- Respond to the Message: Type the response in the message field and click “Send” to reply.
- Resolve the Conversation
 - After the interaction is complete, click the “Resolve” button to indicate that no further action is needed. This will notify the team that the conversation has been closed.
 - If an individual responds to a message after it has been resolved, the conversation will automatically re-open as unclaimed.

- Closing the Application: When the Navigator is finished with their scheduled shift, click on the user initials in the upper right-hand corner of the TextLine application and select “Unavailable.”

RESPONSE EXPECTATIONS

- Navigators should ensure the TextLine mobile application or website is loaded onto their device, signed in and have notifications turned on while at work.
- Staff must monitor and respond to incoming text messages within 15 minutes during their scheduled shift.
- Conversations should be kept brief (160 characters or less) and limited to 3-4 messages per thread before transitioning the conversation to your work cell phone for text messages or a phone call.
- At least one Navigator must be marked as “available” in the TextLine application to respond to messages in real-time.
- If incoming messages are not claimed in a timely manner, a supervisor will assign messages to available staff for follow-up.
- Respect STOP responses. Those who type STOP should no longer be contacted through text.

TONE AND CONDUCT

- Use a professional, respectful tone in all messages.
- Avoid slang, informal abbreviations, emojis, or humor that could be misinterpreted.
- Messages should be clear, brief, and purposeful.
- Do not argue, explain policies at length, or discuss emotions through text.
- Navigators are not permitted to communicate call outcomes or dispositions through text messages or phone calls.

DOCUMENTATION AND OVERSIGHT

- Text messages should be documented in the Homeless Management Information System (HMIS) under call type and call outcome.
- Supervisors may review or audit message threads for quality, training, and accountability purposes.
- Navigators should not respond after work hours unless pre-approved by a supervisor.
- Conversations should remain strictly professional and related to the purpose of the initial text message.
- If a message becomes inappropriate or escalates, notify a supervisor immediately and disengage from the conversation.

COUNTY CONTACT INFORMATION

Tiffany Marsitto, Community Services Supervisor

720.219.5557

TMarsitto@douglas.co.us

Rand Clark, Assistant Director of Community Services

720.245.0718

RClark1@douglas.co.us



COHMIS

COLORADO HOMELESS MANAGEMENT INFORMATION SYSTEM

STATEWIDE HMIS POLICIES AND PROCEDURES v2.0

Purpose

The *COHMIS Manual* comprises the policies and procedures and other documentation used to inform the operation of the Colorado Homeless Management Information System (COHMIS). These policies and procedures will inform the work of the Colorado HMIS Statewide Collaborative and the HMIS Lead Agencies within the Clarity Human Services HMIS Database, hosted by Bitfocus, which represent the state's four HUD-designated Continuums of Care (CoCs).

Update approved by HMIS Statewide Collaborative on: 8/8/2022

Table of Contents

Table of Contents	2
1. Introduction	5
1.1. Definition of Homeless Management Information System (HMIS)	5
1.2. HMIS Historical Background	5
1.3. HUD HMIS Requirement	5
1.4. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act	6
1.5. Applicable Laws or Regulations Impacting the System ‘	6
1.5.2. HB18-1128 Protections For Consumer Data Privacy	6
1.6. Vision for HMIS	7
1.7. Colorado’s HMIS Structure	7
2. Steps to Participate in HMIS	8
2.1. Agency Forms	8
2.1.1. Agency Partnership Agreement	8
2.1.2. Designate a Data Partner Agency Liaison (DPAL)	8
2.1.3. Agency Profiles (New Agency Setup Form and Program Setup Form)	8
3. HMIS Training	8
3.1. First-time Access to HMIS (COHMIS Training Pages for each CoC)	8
3.2. Annual and other Refresher Trainings	8
3.3. HMIS Basics	9
3.3.1. System Idle Times	9
3.3.2. Passwords and Lockout Times	9
4. User Administration	9
4.1. Designating End Users	9
4.2. End User Agreements	10
4.3. Assigning Security Levels	10
4.4. Removing Authorized Personnel	11
4.5. Deactivation Due to Non-completion of Refresher Trainings	11
5. Data Collection	12
5.1. On Whom To Collect Data	12
5.2. Client Consent and HMIS Participation	12
5.2.1. Implied Consent Posted Privacy Notice	14
5.2.2. Verbal Consent and HMIS Participation	14
5.2.3. Written Consent and HMIS Participation	14
5.2.3.1. RHY (Runaway and Homeless Youth) Programs	15
5.2.3.2. Non-RHY Programs	15
5.3. Suspected/Reported Child Abuse	15
5.4. Presumptions of Competency	15
5.5. Suspected/Reported Adult and/or Elder Abuse	16

5.6. Client Access to Information Collected	16
5.7. Storing Informed Consent Forms	16
5.8. Using Paper-Based Data Collection Forms	17
5.9. Collecting Client Disability Information	18
5.10. Prioritization of Chronically Homeless Clients in Permanent Supportive Housing and Recordkeeping	18
5.11. HMIS Data Collection Standards	18
5.11.1. Programs that are not required to report program-specific data to HUD	18
5.12. Sharing Client Data	18
5.12.1. Sharing Thresholds	19
5.12.1.1. Full Shared.	19
5.12.1.2. Basic Shared.	19
5.12.1.3. Not Shared.	19
5.13. Filing a Grievance	19
5.14. Deletion of a Client Record	20
5.15. Revoking Authorization for HMIS Data Sharing	21
5.16. Reducing Duplicate Records in HMIS	21
5.17. Client Discharge – Completing Required Fields for HMIS	21
6. HMIS Quality Assurance	21
6.1. What is Data Quality?	21
6.2. Data Quality and Correction	21
6.3. Ensuring Data Quality across the CoC	22
7. COHMIS HelpDesk Procedures	22
7.1. Data Partner Agency Liaison	22
7.2. Contacting COHMIS Helpdesk	22
7.3. Helpdesk Access Procedures	22
8. HMIS Software Security	23
8.1. What is Security?	23
8.2. Network Security Breach	23
8.3. Network Security System Level Prevention Measures	23
8.3.1. Server Level Security	23
8.3.2. Application Level Security	24
8.4. Data Security Breaches	24
8.4.1. Examples of Qualifying Data	24
8.5. Data Security Breach Prevention Measures	25
8.5.1. Workstation Security Procedures	25
8.5.2. Handling Client Level Data	25
8.5.3. Security Auditing	26
9. HMIS Reporting and Access	26
9.1. HMIS Reporting	26
9.2. Ownership of Client Level Data	26
9.3. Access to CoC-Wide Data	27

9.4. Distribution of HMIS Data	27
9.5. Funder Access	27
9.6. CoC Access	28
9.7. Researcher Access	28
9.7.1. Anonymization of Data	28
9.7.2. Cell Suppression Policy	28
9.8. Release of HMIS Data by Participating Agency	29
9.9. Direct Access to HMIS by Outside Entities	30
9.10. Law Enforcement	31
9.11. Public Health Agencies during a Public Health Emergency	31
10. Coordinated Entry	32
10.1. Definition of Coordinated Entry	32
10.1.1. Background	32
10.1.2. Coordinated Entry in Colorado	32

1. Introduction

The HMIS Policies & Procedures manual outlines the policies and limited procedures of the HMIS Statewide Collaborative's HMIS Lead Agencies in implementing and maintaining Colorado's Statewide implementations of the Homeless Management Information System. This document links to the larger [COHMIS Zendesk Website](#)¹, where procedures are outlined both in the website itself and in the various forms agencies complete to gain access to HMIS.

1.1. Definition of Homeless Management Information System (HMIS)

A Homeless Management Information System (HMIS) is a locally administered data collection tool used to collect ongoing longitudinal data on families and individuals experiencing homelessness—and on persons at risk of experiencing homelessness—who receive assistance from community homeless and other human services providers. The longitudinal data collected can be used to better understand the size, characteristics, and needs of the population for purposes such as: grant writing, program evaluation, tracking of direct services (case management, outreach, service planning, etc.), research coordination and/or participation, and advancing effective fact-based funding and legislative decision making.

1.2. HMIS Historical Background

HMIS began as a grassroots effort in the mid to late 90's to use technology at the community level to improve service delivery, the Continuum of Care (CoC) process, and community homeless planning efforts. As local implementation of HMIS grew and communities were able to generate data about persons relying on homeless services, it caught the attention of Congress. In 2016 Colorado's then 3 CoC's (now 4) began discussions around establishing a statewide HMIS system, working together to achieve common goals around making homelessness rare, brief and one-time. As an alliance of organizations and community leaders representing each of the four Colorado CoCs, the Collaborative's collective purpose is to design, organize, resource, and coordinate the implementation, administration, and maintenance of an effective statewide Homeless Management Information System (HMIS). Through this network of relationships that crosses and links each of the CoCs and key stakeholders, the Collaborative orchestrates a coordinated set of actions to identify methods, practices, and procedures that support and strengthen the approach each of the participating Colorado CoCs and the State of Colorado use to record, report, and improve access to housing and homeless services through the statewide HMIS. The Collaborative operates largely beyond the scope of any one particular board in a coordinated governance process that helps deploy resources from the various stakeholder groups to accomplish its prime objective: an effective, sustainable, high performing statewide approach to the HMIS.

1.3. HUD HMIS Requirement

In July 2003, the Department of Housing and Urban Development (HUD) published a draft notice of the [HMIS Data and Technical Standards](#)². In July 2004, HUD finalized this notice and published it in the Federal Register to encourage communities around the nation to set up an HMIS. The notice specified what data elements should be collected and established minimum baseline policies and procedures for privacy, confidentiality, and security standards designed to protect client-level data. In 2005 the Annual Homeless Assessment Report (AHAR) reporting process was established, and in 2018, HUD updated the AHAR into the Longitudinal System Analysis³. This process identifies the procedures for collecting and reporting HMIS

¹ [COHMIS Zendesk Website](https://cohmis.zendesk.com/hc/en-us): <https://cohmis.zendesk.com/hc/en-us>

² [HMIS Data and Technical Standards](#):

<https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf>

³ [Longitudinal System Analysis](#): <http://www.hudexchange.info/homelessness-assistance/LSA/>

data to Congress for use in making federal appropriation decisions. During the same time-period, HUD informed communities that HMIS data collection would be given points in the Super NOFA grant application ratings. The vision was that as communities participated in HMIS, more accurate information would be collected. This information would be more reflective of the plight of the homeless and at-risk populations, resulting in a better, national understanding. In 2018, HUD amended the HMIS data standards. HMIS databases are the de-facto databases used for HUD-sponsored homeless and at-risk data collection efforts. As the HMIS data standards⁴ continue to evolve they will record, interpret and present data that can positively impact policy decisions that address the problem of homelessness in Colorado and the United States.

1.4. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act

The [HEARTH Act](#)⁵, enacted into law on May 20, 2009, requires that all communities have an HMIS with the capacity to collect unduplicated counts of individuals and families experiencing homelessness. Through their HMIS, communities should be able to collect information from projects serving homeless families and individuals to use as part of their needs analyses and to establish funding priorities. The Act also codified into law certain [data collection requirements](#)⁶ integral to HMIS. With enactment of the HEARTH Act, HMIS participation became a statutory requirement for recipients and subrecipients of [Continuum of Care](#) (CoC) Program⁷ and [Emergency Solutions Grants](#) (ESG)⁸ funds.

1.5. Applicable Laws or Regulations Impacting the System ‘

1.5.1. [The Health Insurance Portability and Accountability Act of 1996 \(HIPAA\)](#)⁹

HIPAA’s Privacy Rule states that “Individually Identifiable Health Information” is to be considered “protected health information” [PHI] subject to the review and control of individual patients. Per HUD’s [HMIS Regulations and Notices](#)¹⁰ webpage, HMIS Data and Technical Standards were developed after careful review of the HIPAA standards for securing and protecting patient information. Agencies and other entities handling PHI are mandated to restrict access to such information to appropriate persons and protect the privacy of individuals. Clarity HMIS includes customization features at micro and macro levels to automate the enforcement of federal, state, and local privacy requirements such as HIPAA. Clarity HMIS Security Tools enable each partner agency to define which client data is shared with other agencies at every level, including the field level.

1.5.2. [HB18-1128 Protections For Consumer Data Privacy](#)¹¹

Except for conduct in compliance with applicable federal, state, or local law, the bill requires covered and governmental entities in Colorado that maintain paper or electronic documents (documents) that contain personal identifying information (personal information) to develop and maintain a written policy for the destruction and proper disposal of those documents. Entities that maintain, own, or license personal information, including those that use a nonaffiliated third party as a service provider, shall implement and maintain reasonable security procedures for the personal information. The notification laws governing disclosure of unauthorized acquisitions of unencrypted and encrypted computerized data are expanded to specify who must be notified following such unauthorized acquisition and what must be included in such notification.

⁴ [HMIS Data Standards](#) (Most up-to-date version): <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

⁵ [S. 896 the Homeless Emergency Assistance and Rapid Transition to Housing \(Hearth\) Act](#): <https://www.hudexchange.info/resource/1717/s-896-hearth-act/>

⁶ [Data collection requirements integral to HMIS](#): <https://www.hudexchange.info/programs/hmis/hmis-requirements/>

⁷ [Continuum of Care \(CoC\) Program](#): <https://www.hudexchange.info/programs/coc/>

⁸ [Emergency Solutions Grants](#): <https://www.hudexchange.info/programs/esg/>

⁹ [Health Insurance Portability and Accountability Act](#) (full law): <https://www.govinfo.gov/app/details/PLAW-104publ191/summary>

¹⁰ [HMIS Regulations and Notices](#): <https://www.hudexchange.info/programs/hmis/hmis-regulations-and-notices/>

¹¹ [HB18-1128 Protections For Consumer Data Privacy](#): <https://leg.colorado.gov/bills/hb18-1128>

1.6. Vision for HMIS

Our vision is that clients, agencies, and everyone in our communities benefit from a streamlined approach to referrals, intakes, and assessments across the entire service delivery system in Colorado. We envision that our Statewide HMIS offers the following benefits:

- Ensuring that each CoCs Lead Agency is in regulatory compliance with HEARTH Act and HUD system requirements as outlined in current HUD Data Technical Standards.
- Coordinated case management across agencies, programs, and services that is designed to allow all service providers in the community achieve a “one-stop-shop” concept for participants.
- The ability to track and measure outcomes achieved by the four Continuums of Care (CoC) and other programs within the CoCs.
- Service coordination within communities with a goal of moving towards statewide service coordination.
- More information shared with funders, boards, and other stakeholders that can be used to inform and facilitate equitable and data-driven decisions.
- Observation and action informed by data trends which identify problems, issues, and needs of persons experiencing homelessness and other at-risk populations; with a focus on populations who experience homelessness at disproportionately higher levels due to systemically oppressive systems which are impacted by events like historic and structural racism, income inequality, etc.
- The development or modification of state and local policies that can identify or reduce service gaps and help make homelessness rare, brief and one-time.
- The ability to track and measure outcomes for the goals outlined in federal, state and local plans to end homelessness.

1.7. Colorado’s HMIS Structure

Colorado’s HMIS Statewide Collaborative is a group representing HUD’s four Continuums of Care in Colorado: the Metro Denver CoC or Metro Denver Homeless Initiative (MDHI), Pikes Peak Community Health Partnership (PPCHP), Balance of State Continuum of Care (BoS CoC), and the Northern Colorado Continuum of Care (NoCO CoC).

Colorado CoC:	MDHI	Pikes Peak	Balance of State	Northern Colorado
Address:	711 Park Ave West Suite 320 Denver, CO 80205	121 S Tejon Street Suite 601 Colorado Springs, CO 80903	2111 Champa Street Denver, CO 80205	242 Conifer Street Fort Collins, CO 80524
Executive Director:	Jamie Rife	Amber Ptak	John Parvensky	David Rout
HMIS Lead Agency Contact:	Kyla Moe	Evan Caster	Denny Wetmore	Rachel Kirkland

The Collaborative is responsible for providing counsel and assistance to the HMIS Lead Agencies, staff members, CoC governing bodies, and contributing providers within each of the four participating CoC on all matters regarding homeless service data and HMIS. For more information please refer to the updated COHMIS Statewide Collaborative Governance Framework.

2. Steps to Participate in HMIS

2.1. [Agency Forms](#)¹²

2.1.1. **Agency Partnership Agreement**

To use the HMIS, an agency must sign and agree to abide by the terms of the COHMIS [Agency Partnership Agreement](#). The Agency Partnership Agreement is between the agency and the HMIS Lead Agency as designated by the CoC. Agencies that provide services in multiple CoCs must sign an Agency Partnership Agreement with the HMIS Lead in their respective CoCs. The Agency Partnership Agreement details participation guidelines and policies and procedures that must be followed in order to use the HMIS provided by Bitfocus for Colorado's CoCs. The agreement outlines steps that must be taken to protect client data and ensure that all information is collected and entered in a timely manner with good data quality and completeness. It also defines requirements pertaining to confidentiality, data entry, roles and responsibilities, security, reporting, and other items deemed necessary for proper HMIS use and operation.

2.1.2. **Designate a Data Partner Agency Liaison (DPAL)**

Data Partner Agency Liaisons (DPALs) play an important role in communicating and leading the effectiveness of HMIS at a Partner Agency-level. The DPAL is the central point in the Agency Partnership Agreement, facilitating communication between their Agency Staff and the HMIS Lead Agency. The DPAL must be an active user of HMIS and will be the first point of contact within their respective agencies for HMIS issues and questions. The DPAL must sign and agree to abide by the terms of the [COHMIS Data Partner Agency Liaison \(DPAL\) Agreement](#).

2.1.3. **Agency Profiles ([New Agency Setup Form](#) and [Program Setup Form](#))**

Each agency must be set up in HMIS and agency profiles must be completed prior to HMIS use and entry of data. Agencies cannot use HMIS until the Agency Set Up Forms have been verified and approved by the CoC's Lead Agency. Agency Set Up Forms will be reviewed by agencies and updated on an annual basis as necessary.

3. HMIS Training

3.1. **First-time Access to HMIS (COHMIS Training Pages for each CoC)**¹³

End users must complete training as outlined on the respective CoC's training page on Zendesk at <https://cohmis.zendesk.com/hc/en-us/categories/28620038068109-Training>.

3.2. **Annual and other Refresher Trainings**

End users will be required to complete refresher training annually and/or as necessary for newly introduced database and HUD regulatory requirements.

HMIS Leads will send email notices to DPAL's and end-users reminding HMIS end-users of upcoming training requirements and deadlines.

¹² COHMIS: [Agency Forms on the COHMIS Website](#):
<https://cohmis.zendesk.com/hc/en-us/articles/360013795072-Agency-Forms>

¹³ COHMIS: [First-time Access to HMIS \(COHMIS Training Pages for each CoC\)](#):
<https://cohmis.zendesk.com/hc/en-us/categories/28620038068109-Training>

3.3. HMIS Basics

3.3.1. *System Idle Times*

If the user is inactive (idle) for 30 minutes, the system will log the user out. At 25 minutes of idle time, the user will receive an on-screen warning that their session will end in 5 minutes. A pop-up will appear, and if the user is still using the system, they may select the appropriate button to continue their session.

3.3.2. *Passwords and Lockout Times*

Passwords should be unique and should never contain personal identifying information, such as the user's name. The system will require users to choose a certain format for passwords (e.g. upper and lower case letters, numbers, symbols, etc.)

If a user enters their password incorrectly 4 times, they will be locked out of the system for 1 hour. This is a security measure designed to protect both users and the sensitive data that the system contains. To avoid waiting, users may email the COHMIS Helpdesk to request their account be unlocked so that they can reset their own password.

Users will be required to change their password every 120 days. At 110 days, users will receive a notice to reset their password in 10 days. The automatic password reset date then resets to 120 days.

Storing passwords in internet browsers **is prohibited**.

4. User Administration

4.1. Designating End Users

Any individual working on behalf of the agency (employee, contractor, and volunteer) that will collect information for HMIS purposes must be designated as an HMIS end user, and therefore is responsible for adhering to the policies and procedures set forth in the manual.

Only authorized individuals who have successfully completed the necessary training and have signed and submitted the COHMIS End User Agreement will be allowed to participate in HMIS activities. HMIS activities include:

- Collecting personal identifying information for entry into HMIS
- Accessing HMIS
- Reviewing data from HMIS that contains Personal Identifying information of clients

Anyone who collects any HMIS data (electronic or paper) or creates reports from the system is deemed an HMIS end user. HMIS end users are held accountable for the custody of client level data and for the privacy, confidentiality, and security of that data.

Partner Agencies are responsible for providing basic confidentiality training to all authorized personnel. HMIS End User training will review confidentiality and security elements prior to authorizing access. Partner Agencies shall refer to their personnel policies, current HMIS Policies and Procedures, and current HUD [HMIS Data and Technical Standards](#) to determine if their staff, volunteers and other persons should have access to HMIS data.

Without the proper HMIS training, individuals will not be prepared to respond to clients'

questions regarding HMIS consent, revocation, intake forms, and other aspects of HMIS data collection. In order to designate an HMIS user, the end user will complete required end user training(s) and pass all testing elements. During this training process, end users will request end user access from their agency DPAL who will submit their request to the HMIS Lead Agency. It is in the best interest of agencies to have several employees trained and credentialed; this strategy is good for backup purposes and enables employees within the agencies to help each other and assist with client questions and/or concerns.

The Agency DPAL can pull a report at any time, reflecting a current list that identifies all authorized users and their assigned access level(s) and activity.

4.2. End User Agreements

The End User Agreement is a contract between a Partner Agency and its employees, contractors, or volunteers who are authorized to collect HMIS data and/or enter data into the system as end users. All end users must sign the agreement stating that they will abide by the policies and procedures associated with protecting the privacy, confidentiality, and security of client level data. End users will be required to keep updated End User Agreement Forms annually within the Clarity system. The HMIS Lead Agency should never delete a signed COHMIS End User Agreement upon revoking an individual's authorization or in terminating an individual's employment.

Authorized personnel who do not have direct access to Clarity but interact with client level Personally Identifiable Information (PII) from HMIS will also be required to sign annual End User Agreements. They will require hard copies to be kept in personnel files or in another area determined by their agency that will be easily accessible by HMIS Leads during agency monitoring. End User Agreements must be reviewed and signed electronically when users first login to HMIS.

4.3. Assigning Security Levels

HMIS Lead Agency staff will work with Partner Agencies to ensure that end users are assigned the appropriate security level and have appropriate access to libraries based on their role.

Within HMIS, each end user is assigned a role that is associated with a certain level of security. This security allows users to gain access to certain areas of the HMIS application. End user security is utilized to ensure that individuals can only access the type of client level information necessary to do their job. Specific access will be determined by agency need in coordination with the CoC's HMIS Lead.

The three end user roles available are:

- Enterprise – this role offers access to Clarity's primary enrollment, tracking, and reporting functions.
- Enterprise with Data Analysis – this role is limited to fewer staff at each agency and could include the DPAL. It offers everything the Basic role provides, plus enhanced reporting capabilities.
- System Administrator – this role is reserved for HMIS Lead Agency staff, as it offers full system access.
- Attendance Only User - For CoC's utilizing "Attendance Only" User type, the "Attendance Only End User(s)" will be shown how to use the module and enter participants, as well as be given a "Attendance Only" access login, but will not have any access to HMIS agencies or HMIS programs and so will not be required to attend full HMIS Training.

Procedures for determining appropriate access:

1. COHMIS Helpdesk personnel will grant individuals access to the appropriate libraries and pages based on the agency's description of each user's role. To assign the security level for a user the agency DPAL should submit a request to the COHMIS Helpdesk. Please ensure that an updated list of approved users has been submitted at least semiannually.
2. Agencies may contact the COHMIS Helpdesk if it is determined that an end user may need a different type of access in HMIS. All requests for permissions changes will be handled on a case-by-case basis. License types and quantities are limited based on Partner Agency and availability across the CoC, so not all requests may be confirmed depending on availability. The COHMIS Helpdesk will work diligently with agencies to ensure all end users have proper permissions in HMIS by examining the end user's role.

4.4. Removing Authorized Personnel

The COHMIS Helpdesk must be notified within one business day when an individual is no longer authorized to access HMIS on the agency's behalf. The DPAL should submit a ticket to their CoC HelpDesk indicating the user account needing deactivation. Upon receipt of the request, the HMIS Lead Agency will immediately deactivate the individual's HMIS user account. The HMIS Lead Agency should never delete end user accounts in order to provide a record of all end users with access historically, and instead should deactivate accounts accordingly.

All end user accounts are subject to a 90-day activity review, with a 15-day warning; if an end user does not login to HMIS within a 90-day period, their access will be deactivated automatically. This access can be reactivated by the DPAL submitting a ticket to the CoC HelpDesk indicating the user account needing reactivation, along with a reason as to why the end user had not logged in within 90 days and still needs access. An end user who has been inactive for six months or more must work with the Lead Agency to be reauthorized, which could include additional training.

4.5. Deactivation Due to Non-completion of Refresher Trainings

Each year, users must complete a refresher training to ensure continued understanding of HMIS. If a user does not complete this training by the quiz deadline, their access to HMIS will be deactivated. Users that miss the deadline may be given an additional time frame to take the training. Once the respective CoC Lead Agency's HelpDesk confirms that the user has taken and passed this quiz, the user's access to HMIS will be reinstated. Any user not reinstated within the designated timeframe will need to take new user training to gain access to HMIS.

5. Data Collection

5.1. On Whom To Collect Data

Agencies should attempt to collect data from families and individuals who are experiencing homelessness or at risk of becoming homeless and are accessing services from their agency. Each program within an agency should strive to collect information from consenting adults and household members who will benefit from the services rendered. Agencies should strive to collect information to accurately portray who they helped. This information can be used to fulfill funder reporting requirements and to produce agency/community statistics for planning purposes. It is important for agencies, especially emergency services providers, to know basic information about clients who are served, their household composition and services provided. Agencies may also choose to collect data for HMIS on individuals or families that make contact with the agency but are not able to receive services from the agency. One of the greatest benefits of HMIS to an agency is its ability to create reports describing the agency's clients, outcomes of the services they receive, and general agency operating information.

Procedure:

1. For HMIS purposes, HUD's most recent version of the minimum standards require that individuals or families who are homeless or at risk of becoming homeless and are accessing services from an agency must have a certain minimum amount of data collected in HMIS. Some programs/agencies may Require HMIS participation. [See the most updated version HUD's HMIS Data Standards Manual by Clicking Here.](#)
2. Client level HMIS data will be collected at agency intake. The client will always have access to the Release of Information, which explains data collection and sharing.
3. Client data can be shared through implied consent (posted HMIS notice), verbal consent or informed (written) consent.
4. If the client chooses to participate in data collection but not data sharing (ROI refusal), the agency will still collect and enter the data under a private record in HMIS accessible by only that agency.
5. If sharing client-level data or participating in CoC-wide activities (e.g. Coordinated Entry), a written consent should be signed. However a verbal or implied consent for release can suffice. Agencies should always strive to have written consent (Release of Information).
6. Clients can always choose not to participate in HMIS at all. However, if it is a condition of program enrollment the client will lose eligibility for Federally funded programs that have this data entry requirement should they refuse to participate.
7. Information must be collected and entered into HMIS for each family member actively benefiting from the program, not just the head of the household.

5.2. Client Consent and HMIS Participation

Agencies must decide, for each of their programs, whether to obtain consent through implied (posted privacy notice), verbal, or informed (written authorization) methods. Regardless of the type of consent method used, all consent must be obtained fairly and in good faith. The HUD [HMIS Data and Technical Standards](#) allow agencies to collect data using implied consent at minimum, given that some agencies service a high volume of clients. The standards also recognize that there may be a need for greater privacy protection and recommend informed

consent in those cases. All types of data collection procedures should be explained to the client during intake to help them understand their rights regarding their information. The three forms of consent are defined briefly below.

- **Written consent:** The client signs a form to agree/disagree to participate in HMIS data sharing. ([COHMIS Release of Information \(ROI\)](#)¹⁴)
- **Implied consent (posted privacy notice):** HMIS data sharing is explained and the client gives their information freely, without directly being asked to participate.
- **Verbal consent:** The client verbally agrees/disagrees to participate in HMIS data sharing.

Agencies can decide by program how to obtain consent based on what is the most practical method for the program type (e.g., verbal consent for call-based referrals versus informed consent for housing programs). Consent must be obtained in a consistent manner within each program, meaning that all program's clients must provide the same form of consent. Agencies that serve non-English speaking clients should provide consent information in a language that their clients can understand (e.g., Spanish).

When an individual decides not to participate in HMIS, an agency cannot deny them services solely for that reason. However, agencies may need information from the client in order to provide services (for example, a social security number is needed to secure TANF benefits). In examples like this, agencies are not required to guarantee services. Agencies should determine if an individual will or will not receive services before the individual goes through the informed consent process. This will eliminate a perceived relationship between HMIS participation and service delivery.

Procedure:

1. Agencies may work directly with HMIS Leads to set up their program or use the [Program Setup Form](#)¹⁵ (Your HMIS Lead will inform you of the method and provide the link). Agencies must then formally decide by program which method will be used to obtain client consent. To change consent type, agencies must submit requests in writing to the HMIS Lead Agency.
2. Each program must consistently use the same method for obtaining consent.
3. Agencies will follow HUD's minimum guidelines for achieving implied consent.
4. Only an authorized HMIS end user who has completed the HMIS Policies and Procedures Training may obtain consent from clients.
5. HMIS users must obtain consent from clients in a manner that is respectful, fair, and in good faith for both the client and HMIS (meaning that the explanation of HMIS, data collection, client rights, etc., must be provided in an objective manner).
6. The HMIS user must adhere to the agency's decision for the applicable program regarding the method of obtaining consent.

¹⁴ COHMIS: [Client Forms: Release of Information](#) (Most up-to-date version on Zendesk): <https://cohmis.zendesk.com/hc/en-us/articles/19638351277965-FY2024-New-COHMIS-Client-Forms>

¹⁵ COHMIS: [Program Setup Form](#) (most up-to-date form on Zendesk): <https://cohmis.zendesk.com/hc/en-us/articles/360013795072-Agency-Forms>

5.2.1. Implied Consent Posted [Privacy Notice](#)¹⁶

The COHMIS Implied Consent Posted Privacy Notice is a brief document that describes a client's rights in relation to HMIS, the circumstances in which we would use and disclose client information, and other agencies that have access to HMIS data. These notices must be appropriately posted within an agency and are available on the COHMIS website. An agency could also post the Implied Consent Posted Privacy Notice in waiting rooms, adjacent to intake lines, or in other areas where clients congregate before intake occurs. This will give clients an opportunity to read the notice before receiving services.

Procedure:

1. Privacy Notice must be posted anywhere client level data is collected, including where verbal consent and written consent are obtained.
2. Each workstation, desk, or area that is used during HMIS data collection must post the COHMIS Privacy Notice.
3. If an individual or family does not speak English, the agency must attempt to obtain consent to the best of their abilities in a language the client understands. COHMIS forms are currently available in English and Spanish. Other reasonable accommodations, such as languages or mediums of communication (e.g. Braille, TTY, etc.), must be made available to clients based on their cultural and linguistically appropriate needs.
4. When entering an implied ROI in HMIS, choose “verbal consent” for ROI type.

Procedure:

A copy of the privacy notice should be offered to the client.

5.2.2. Verbal Consent and HMIS Participation

Verbal consent is obtained by delivering to the client an agreed-upon agency script that provides an explanation of HMIS. The script details why HMIS data is being requested and outlines the client’s rights related to HMIS data collection. All employees working with clients should consistently use their agency's script to collect client level HMIS data.

Procedure:

A copy of the privacy notice should be offered to the client.

5.2.3. Written Consent and HMIS Participation

Agencies that decide that their program will collect written consent should use the standard COHMIS Client Consent for Sharing of Your Information. A verbal explanation should be given to the client to inform them of the necessity and importance of collecting their data prior to having the client sign the consent form. Agency staff should review the consent form with the client to ensure that it was filled out appropriately, and then sign as a witness. A copy of the consent should be offered to the client and a signed-printed or digital copy in their file. If there is a signed digital copy, any paper copies can be shredded.

¹⁶ COHMIS: [Client Forms: Privacy Notice](#) (Most up-to-date version on Zendesk): <https://>

cohmis.zendesk.com/hc/en-us/articles/19638351277965-FY2024-New-COHMIS-Client-Forms

Procedure:

A copy of the privacy notice should be offered to the client.

5.2.3.1. RHY ([Runaway and Homeless Youth](#)¹⁷) Programs

- Data may not be shared about any youth served in a RHY-funded program unless the youth has assented/consented.
- Youth under the age of 18 in a RHY-funded program must receive the required parent/legal guardian consent prior to the sharing of their information.
- Youth ages 18 or over may consent for themselves.

5.2.3.2. Non-RHY Programs

- Unaccompanied youth who are at least 15 years old can give their consent to the collection of information about them, even when consent has not been obtained from their parent or guardian.
- Parental/guardian consent can override the youth's consent up to age 18.
- The consent of an unaccompanied youth under the age of 15 can be provided only by their parent or guardian.

5.3. Suspected/Reported Child Abuse

HMIS Users should be familiar with and follow all Federal, State and Agency laws and rules in cases of suspected/reported child abuse/neglect. See [Colorado's Children's Code](#)¹⁸ and the [Division of Child Welfare](#)¹⁹ for more information.

5.4. Presumptions of Competency

Clients are presumed to be competent to provide consent, unless there is a known court order claiming their inability to make informed decisions.

Procedure:

1. If there is a known court order stating that the individual is not competent to make informed decisions, then it will not be possible to obtain informed consent for HMIS participation. In this case, the HMIS user should treat this client as a non-participant unless permission can be obtained by a legal guardian.
2. HMIS users should do their best to obtain informed consent from individuals for whom there is no court order, but who appear to be not fully competent during intake. If it is not possible to obtain a truly informed decision regarding HMIS participation, the individual should be dealt with as a non-participant.
3. Often individuals may have temporary limits on their competency because they are under the influence of a particular substance, which affects their ability to make a decision. If it is possible, collect necessary data with the client to begin enrollment and

¹⁷ [Runaway and Homeless Youth Definitions](#) (Categories 1 and 4 only in Colorado):

<https://www.rhyttac.net/assets/docs/FYSB%20RHY%20FAQs.pdf>

¹⁸ [Colorado Revised Statutes 2016, Title 19, Children's Code](#):

<https://leg.colorado.gov/sites/default/files/images/olls/crs2016-title-19.pdf>

¹⁹ [Colorado Department of Human Services: Division of Child Welfare](#):

<https://cdhs.colorado.gov/our-services/child-and-family-services/child-welfare>

delay informed consent until they are no longer under the influence and are able to verify the basic intake information is accurate and provide consent.

5.5. Suspected/Reported Adult and/or Elder Abuse

HMIS Users should be familiar with and follow all Federal, State and Agency laws and rules surrounding mandatory reporting laws in cases of suspected/reported adult²⁰ and/or elder²¹ abuse and/or mistreatment. See Colorado's [Adult Protective Services](https://cdhs.colorado.gov/aps)²² and their [mandatory reporting](https://cdhs.colorado.gov/aps)²³ page for more information.

5.6. Client Access to Information Collected

Clients have the right to a copy of the data collected from them in HMIS. Agencies are required to print out this information for any client who requests it. If an agency uses hard copy forms to collect the data then a copy of the form can be given to the client.

Agencies are not required to provide any additional information from HMIS to clients (i.e., data that was not collected directly from the client, such as case notes). Disclosure of such information is left to the discretion of the agency.

Procedure:

1. If paper forms are used to collect data from clients, with data entry into HMIS occurring later, consider making a photocopy of the paper forms for the client if they request a copy of the data they provided.
2. Agencies may give clients a copy of the Posted Privacy Notice or Client Informed Consent form, which notify clients of their rights.
3. Agencies that request informed consents may also wish to provide clients with a photocopy of their consent signature page so that the client has a record of their HMIS participation decision.
4. Case management notes are typically not shared with the client. However, elements of case plans such as their Goals, Outcomes, Referrals, and Services can be provided.

5.7. Storing Informed Consent Forms

Informed consent forms should be stored securely in the Clarity database instance, either as a digital signature or a scanned document file. It is important that informed consent forms be kept for at least seven years of time for auditing purposes.

Procedure:

1. Informed consent forms must be kept securely in the Clarity instance (preferred) or in accordance with standard confidentiality and privacy practices for physical files (i.e., locked away in a file cabinet and not accessible without authorization).
2. It is recommended that agencies store informed consent forms in their client files rather than creating a separate file just for HMIS, unless client files are purged prior to seven years after the client last receives services.

²⁰ Adult Definition in Colorado: "...are persons age 18 and older...": <https://cdhs.colorado.gov/aps>

²¹ Elder Definition in Colorado: "...a person age 70 or older...": <https://cdhs.colorado.gov/aps>

²² [Colorado Department of Human Services: Adult Protective Services](https://cdhs.colorado.gov/aps): <https://cdhs.colorado.gov/aps>

²³ [CDHS Adult Protective Services Mandatory Reporting Website](https://cdhs.colorado.gov/mandatory-reporting-of-adult-mistreatment):

<https://cdhs.colorado.gov/mandatory-reporting-of-adult-mistreatment>

5.8. Using Paper-Based Data Collection Forms

Each agency must determine how best to incorporate HMIS into their operating processes. Digital submission and recordkeeping is preferred. Agencies may choose to collect client level data on paper prior to entering the data into HMIS. When this process is used, all of the data gathered on the forms must be entered into the database within a timely manner as listed in the COHMIS Security, Privacy and Data Quality Manual. It is preferable to enter data directly into HMIS as it is collected rather than first recording it on paper. Whether direct data entry or paper forms are used, the data collected and entered must be consistent with that specified on the hard copy forms provided by COHMIS. COHMIS uses four sets of forms for HMIS data collection: Universal Intake, Program-Specific Intake, Interim Assessment, and Exit/Discharge. The appropriate forms to use are based on program type as specified in the COHMIS Security, Privacy and Data Quality Manual. Typically, all programs use the Universal Intake forms, while programs that prepare Annual Performance Reports or other reporting required by funders must also use the Program-Specific Intake form. Programs that produce Annual Performance Reports are also required to use the Assessment Form for periodic evaluations. If a Participating Agency has questions regarding which forms to use, they should contact their HMIS Lead Agency for assistance.

The HMIS forms used by COHMIS are:

- Intake Forms:
 - Head of Household Intake Form
 - Other Household Member Intake form (When information is being collected on a family, it must be collected on each and every member of the family.)
- Program Specific Intake Form
- Assessment Form
- Exit/Discharge Form

Procedure:

1. Agencies may utilize paper-based forms for data collection, but digital recordkeeping is preferred wherever possible. (See section 9.5.2 for guidance on how to properly store paper forms.)
2. When paper forms are used, the data collected must be entered into HMIS within a timely manner as indicated in the COHMIS Security, Privacy and Data Quality Manual.
3. The intake forms can be obtained from the COHMIS Zendesk website. Agencies receiving funds from Federal homeless assistance grants are required to utilize the Program-Specific forms, Assessment form and the Exit/Discharge form. Agencies not receiving these types of funds may choose to use the intake forms.
4. Agencies that are not required to use the Intake form are urged to collect this data anyway, depending upon the type of programs and services the agency offers. The additional data can prove extremely helpful for internal and external reporting on client outcomes and services delivered.
5. Agencies that wish to customize CoC data collection forms to include their own required fields should contact their CoC HMIS Lead Agency for assistance to ensure that minimum data collection standards are met.

5.9. Collecting Client Disability Information

Under the data standards required by HUD, agencies must ask clients questions about disabilities. To comply with other federal laws and regulations, these client questions must be asked at a certain point in time. HUD defines 'disabling condition' as: "(1) a disability as defined in Section 223 of the Social Security Act; (2) a physical, mental, or emotional impairment which is (a) expected to be of long-continued and indefinite duration, (b) substantially impedes individual's ability to live independently, and (c) of such a nature that such ability could be improved by more suitable housing conditions; (3) a developmental disability as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act; (4) the disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agency for acquired immunodeficiency syndrome; or (5) a diagnosable substance use disorder.

5.10. Prioritization of Chronically Homeless Clients in Permanent Supportive Housing and Recordkeeping

Agencies must abide by the [HUD Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#)²⁴ and [Recordkeeping Requirements for Documenting Chronic Homeless Status](#)²⁵. This applies to both the prioritization of clients by vulnerability and the recordkeeping requirements.

5.11. HMIS Data Collection Standards

COHMIS has developed standardized data collection instruments for participating agencies to enable effective and efficient analysis of collected data listed in the [COHMIS Security, Privacy and Data Quality Plan](#)²⁶ Manual. It is important to standardize the data by program type as the goal is to use this data to make informed decisions.

5.11.1. Programs that are not required to report program-specific data to HUD

Universal Identifier Elements (UIE): HUD requires all agencies participating in HMIS to collect a standard set of client information, known as the Universal Identifier Elements, as well as any additional "community reporting" data required by the CoC.

- All housing programs (S+C, SSO, SRO, ESG-RR/HP, Transitional, Permanent and Permanent Supportive Housing programs) that are required to report *program-specific data to HUDs*: Programs receiving funding from federal homeless assistance grants are required to collect the data elements specified in HUD's Program-Specific Data Standards.

5.12. Sharing Client Data

HMIS client data will be shared in accordance with the Agency Partnership Agreements. Sharing enables agencies that work together to coordinate their service offerings and work toward the

²⁴ HUD: [Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#):

<https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>

²⁵ HUD: [Recordkeeping Requirements for Documenting Chronic Homeless](#)

[Status](#):<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/definition-of-chronic-homelessness/recordkeeping-requirements/>

²⁶ COHMIS: [Security, Privacy & Data Quality Plan](#) (Most up-to-date version on Zendesk):

<https://cohmis.zendesk.com/hc/en-us/articles/360013991371-Policy-Procedures>

objective of ending homelessness. COHMIS allows groups of agencies to share the same client record. With the implementation of coordinated entry, sharing client level information will be an integral part of successful assessment, prioritization, referral and housing placement. When coordinating services, it is important to keep the client's Personally Identifiable Information (PII) confidential, unless the client expressly permits that information to be shared. HMIS end users should maintain the highest levels of privacy and confidentiality at all times and must not disclose personal identifiable information except when it is necessary.

5.12.1. Sharing Thresholds

5.12.1.1. Full Shared.

Shared between, and editable by, all participating agencies. Other agencies will have full access to view and edit all information on the client's profile screen.

- Client profile record: Name, birth date, SSN, gender, race, ethnicity
- Household and contact information: Household name, household relationships, household address
- Client photo
- Public Alerts (agencies have the ability to restrict alerts to their agency only)

5.12.1.2. Basic Shared.

Other agencies will see that service, program and assessments transactions have occurred, but will not be able to edit the records

- Program enrollments: case name, entry/exit dates, program name, program type, organization name
- Services and service notes
- Client Assessments: Assessment name and date
- VI-SPDAT assessments (with scores)
- Client Files (agencies have the ability to make select files private)
- Client Forms
- Location and Contact information

5.12.1.3. Not Shared.

Limited to the organization that created the record.

- Sensitive client data: case notes, HIV/AIDS status, mental illness, domestic violence, alcohol use, substance use
- Assessment Details
- Client notes

5.13. Filing a Grievance

Clients have the right to file a grievance if they feel their privacy rights have been violated. If a client files a grievance against an agency, the HMIS Lead Agency will ensure that there is no retaliation taken against the client. The most updated [Grievance form](#)²⁷ can be found on the COHMIS website.

²⁷ COHMIS: [Client Forms: Grievance Form](#): (Most up-to-date version on Zendesk): <https://cohmis.zendesk.com/hc/en-us/articles/19638351277965-FY2024-New-COHMIS-Client-Forms>

Procedure:

1. The client must request and complete the grievance form linked above.
2. The client may provide the form to a Partner Agency manager, DPAL or another person of authority not related to the grievance OR may mail the form to their HMIS Lead Agency contact.
3. When a Partner Agency receives a completed grievance form, it must submit the form to the HMIS Lead Agency within two business days.
4. The HMIS Lead Agency will review the grievance, research the nature of the complaint, and respond to the individual filing the grievance with a copy going to the Partner Agency within 30 days.
5. The Partner Agency named in the grievance may not refuse or reduce services to the client because of the filing of a grievance.
6. If a client reports retaliation due to filing a grievance, the retaliation will be investigated by the CoCs Board of Directors.

5.14. Deletion of a Client Record

The HMIS Statewide Collaborative follows HUD's [2004 HMIS Data & Technical Standards](#) in regards to the deletion of a client record. "A covered homeless organization (CHO) must develop and implement a plan to dispose of or, in the alternative, to remove identifiers from, protected personal information (PPI) that is not in current use seven years after the PPI was created or last changed (unless a statutory, regulatory, contractual, or other requirement mandates longer retention)."

Procedure

1. When an HMIS record has met the threshold of having no changes in the 7 years since it was first created or last updated, CoCs may either completely delete the entire record, or remove identifiers from the record within the Clarity System. Note that the 7-year threshold is HUD's standard for HMIS. Other obligations (federal, state, local, other contractual requirements) may necessitate retention past the 7-year threshold.
2. Destruction of information by an organization or provider must be carried out in accordance with federal and state law pursuant to a proper written retention schedule and destruction policy approved by appropriate organizational parties.
 - a. Records involved in any open investigation, audit, or litigation must not be destroyed until the litigation case has been closed.
 - b. There is no single standard destruction requirement. Organizations should reassess the method of destruction annually based on current technology, accepted practices, and availability of timely and cost-effective destruction services.
 - c. In the absence of any state law to the contrary, organizations must ensure paper and electronic records are destroyed with a method that provides for no possibility of reconstruction of information.

5.15. Revoking Authorization for HMIS Data Sharing

Clients who initially agree to participate in COHMIS data sharing, have the right to rescind that permission.

Procedure:

1. *Clients* must request and complete the COHMIS [Revocation Request](#)²⁸ Form and submit it to the Partner Agency.
2. *The* Partner Agency will submit the revocation form to their HMIS Lead Agency.
3. *The* HMIS Lead Agency will process the request and confirm with the Partner Agency the revocation process date so they can inform the client.
4. *The* HMIS Lead Agency will review the client history and inform all agencies who have worked in the client file that the client record has been de-identified. The HMIS Lead Agency will provide the Unique Identifier (UID) to each agency so they may access the client's record, if needed.

5.16. Reducing Duplicate Records in HMIS

To avoid creating multiple records for the same client within HMIS, HMIS users must always search to see if a record already exists for the client before creating a new client record.

Procedure:

1. When duplicate records are found, alert the HMIS Lead Agency via a Zendesk Help Ticket for record merging. When contacting helpdesk for a merge, a primary profile must be identified by the HMIS user.
2. Always email client Unique Identifiers (UIDs) only, without Personally Identifiable Information (PII).

5.17. Client Discharge – Completing Required Fields for HMIS

When a client is being discharged or is exiting the program, HMIS end users must, to the best of their ability, ensure that all Universal and CoC-required data fields have been completed, and that any required Program-Specific data fields have been completed, within the client's HMIS record. See sections 6.7 and 6.9, above, and the COHMIS Security, Privacy and Data Quality Manual for more information on these data fields.

6. HMIS Quality Assurance

6.1. What is Data Quality?

Data quality refers to the reliability and validity of the client level data collected in HMIS. It is measured by the extent to which the client data in the system reflects actual information in the real world. For more detailed information on Data Quality, please review the [COHMIS Security, Privacy and Data Quality Manual](#).

6.2. Data Quality and Correction

The DPAL or their designees are required to facilitate the correction of data quality problems identified on data quality reports. The HMIS Lead Agency will work with the DPAL to support

²⁸ [COHMIS Client Forms: Revocation Request](#):

them in ensuring that the data contained within HMIS is of high quality. Information about the data quality reports required by the CoC can be found in the [COHMIS Security, Privacy and Data Quality Manual](#).

6.3. Ensuring Data Quality across the CoC

Unresolved data quality issues will be subject to corrective action as described in the [COHMIS Security, Privacy and Data Quality Manual](#).

7. COHMIS HelpDesk Procedures

7.1. Data Partner Agency Liaison

DPAL will provide the first level of technical assistance for Partner Agency HMIS end users and be the best resource for information about the agency's policies and procedures as they relate to HMIS. If the DPAL is unable to resolve any HMIS user concerns they will contact their HMIS Lead Agency for assistance.

7.2. Contacting COHMIS Helpdesk

COHMIS users can find a wealth of information on the COHMIS HelpDesk Portal: cohmis.zendesk.com. This portal also allows end users to login to review the status of their tickets, and find additional information related to their support needs.

The COHMIS HelpDesk Portal is combined across all four HMIS Lead Agencies. If the information is unable to be resolved using the COHMIS HelpDesk Portal, end users should contact their CoCs HMIS Lead Agency Helpdesk. For end users working in multiple CoCs, the ticket should be submitted to the HMIS Lead Agency with the most proximity to the client, project or issue.

CoC HMIS Lead Agency Helpdesk Contact Information

CoC Name:	MDHI	CoC Name:	Pikes Peak
Email:	hmishelp@mdhi.org	Email:	hmishelpdesk@ppchp.org
Phone:	720-500-4116	Phone:	719-632-5094
Hours:	Monday-Friday, 9-3	Hours:	Monday-Friday, 8-5
CoC Name:	Northern Colorado	CoC Name:	Balance of State CoC
Email:	hmis@homewardalliance.org	Email:	colorado.hmis@coloradocoalition.org
Phone:	970-430-6442	Phone:	303-312-9666
Hours:	Monday - Friday, 9-4	Hours:	Monday - Friday, 9-4

7.3. Helpdesk Access Procedures

Agencies can initiate a request for assistance through the COHMIS HelpDesk Portal on [Zendesk](#), email or telephone, preferably in that order. It is important that all calls and emails to the

Helpdesk are processed in an efficient and effective manner. Emails and telephone calls will be responded to within 2 business days. To ensure that this goal can be achieved the following procedures should be followed:

Procedure:

1. While the Helpdesk strives to answer as many calls as possible during regular business hours, if a caller must leave a voicemail message, the message should include: the names of the caller, agency, and program; a return phone number; and the issue prompting the call. A staff member will respond within 2 business days to gather any further information needed to determine the appropriate resolution.
2. When contacting the Helpdesk, it is better to use email rather than telephone. Sending an email will allow you to include a screenshot of the error; screenshots go a long way in facilitating a quick problem resolution.
3. When contacting the Helpdesk via email, always refer to a client by their Unique Identifier (UID). Do **not** transmit Personally Identifiable Information (PII) via email. Emails/tickets submitted with PII will be deleted and the end user will be required to re-submit. Encrypted emails can not be read by the HMIS Helpdesk and will be deleted as well.

8. HMIS Software Security

8.1. What is Security?

Security is the degree of resistance to, or protection from, harm or unauthorized access to electronic data. The security of the data held in our HMIS database is a high priority in our community. We take the confidentiality, integrity, and availability of all HMIS information seriously and understand that as stewards of client level data we must protect against any reasonably foreseeable threats or hazards to security and ensure that end users are in compliance with the standards set forth in this manual. Security breaches can be defined as network security breaches and data breaches.

8.2. Network Security Breach

While it may be impossible to totally avoid network security breaches, you can lessen the chance of a network intrusion by monitoring and changing employee passwords, backing up your network, and using experienced IT personnel to aid you in protecting the information your network contains.

8.3. Network Security System Level Prevention Measures

8.3.1. Server Level Security

Bitfocus owns and maintains its own physical servers and network infrastructure in a secure, US-based data center. Hosting facilities provide state-of-the-art security that enforces 24/7 physical and electronic security, including on-site security guards, trap-door entry, key card, and biometric access, and electronic surveillance and alarms. The Clarity HMIS software is secured physically through several best practices, resulting in highly effective security at the most basic level. Several of these system-level security features include:

- *Separation of the database and application on different servers*
- *Hardware Firewall that forwards only port 443 (Encrypted SSL) to the internal web*

server. A software firewall also protects each customer web server on the internal network. Multiple layers of firewalls between database, application, and users

- *Encryption of the data on the database. All traffic is 2,048 bit SSL encrypted. All API traffic must be further encrypted.*
- *Access to the internal network is only possible via an encrypted VPN connection. Access to the internal network is only provided to Clarity Human Services staff and authorized system administrators.*
- *Undisclosed location of the physical servers*
- *Physical servers are locked down in secured, fire-safe rooms. Databases are housed on an internal server, inaccessible from the public network. This ensures that client data is protected by our multi-layer security systems and strict access policies.*

8.3.2. Application Level Security

There are additional layers of security built into the Clarity HMIS software itself. This makes the system harder to access without appropriate permissions. These security features include:

- 128-bit encryption of the connection between an HMIS user's computer and the HMIS application
- Users are organized into security groups that are given specific permissions for what their members can access in HMIS
- Two-factor authentication
- A user's connection to the application automatically closes after a period of inactivity
- Logging and audit systems in the background automatically record each user's activities in adding, viewing, and editing information

8.4. Data Security Breaches

A data breach occurs when the steward (i.e., HMIS end user or agency staff) of information allows it to fall into the hands of an unauthorized party. This can involve data in any form including that which is printed or transmitted verbally, although in the digital age the term has generally come to refer to the transfer of electronically stored data. Partner Agency Agreements indicate that the Partner Agency can be held liable for any data breaches as a result of their staff's actions, and the HMIS Lead Agency is not liable for breaches or loss occurring as a result of HMIS end user or Partner Agency actions. Regardless, the HMIS Lead Agency must be made aware of the breach per the protocol listed in the COHMIS Security, Privacy and Data Quality Manual.

8.4.1. Examples of Qualifying Data

- First name or first initial and last name
- Social Security number
- Driver's license or State Identification number
- Account number or credit card number
- Medical information
- Health insurance identification number
- Username or email address, in combination with a password or security questions and answers that may promote access to the account⁹

8.5. Data Security Breach Prevention Measures

8.5.1. Workstation Security Procedures

Statistically, most security breaches are due to human error rather than systematic issues. To keep the application and data secure, HMIS users must implement some additional security measures.

Procedure:

1. Do not write down your username and password. However, if that is not practical and you must write them down, do not store them in an unsecured manner (i.e., under the keyboard or on the monitor). Such practices can lead to security breaches. Instead, store them in a locked drawer or cabinet. We are the stewards of our clients' data.
2. Never share your login information with anybody (including site or system administrators). If someone is having trouble accessing HMIS, contact the Agency DPAL or the COHMIS Helpdesk. Sharing usernames and passwords is a severe violation of the HMIS End User Agreement. If you share your username and password with someone, anything they do in the system will be tracked to your user account. When administrators review the data and security logs, you will be held responsible for any HMIS activity that occurred under your login.
3. When you are away from your computer, log out of HMIS or lock down your workstation. Stepping away from your computer while you are logged into HMIS can lead to a serious security breach. Although there are timeouts in place to catch inactivity built into the software, they do not take effect immediately. Therefore, any time you leave your workspace and are no longer in control of the computer, you should lock down your workstation.
4. Your computer screen should be positioned so that it is difficult for others in the room to see the contents of the screen. The placement of monitors can play a major role in establishing security at the agency. Good placement: When someone walks into the room all they can see is the back of the monitor. Bad placement: When someone walks into the room, they can look over your shoulder without you knowing it and read material on the monitor.

8.5.2. Handling Client Level Data

To secure client level data, it is necessary to eliminate any opportunities for its unauthorized disclosure. Each HMIS user must take the necessary precautions when accessing and using clients' personally identifiable information. Whether it is in electronic or printed form, such information should never be displayed in public areas, faxed, kept on desks in unlocked offices, or distributed electronically. The CoC, and the agency's HMIS DPAL and Executive Director must be contacted within 24 hours if a data security breach is detected.

The COHMIS recommends these best practices:

- Limit access to all forms of personally identifiable information (name, birth date and SSN). Whenever possible strip names, birth dates and SSNs from reports. Provide this information only to people that "need to know" within the

organization.

- Secure electronic files containing personally identifiable information on a network drive with limited access, and password protect such files (don't backup).
- Properly dispose of paper copies generated from HMIS by shredding them or storing them in a locked cabinet.
- Do not store or save files containing exported information (e.g., data exported to Excel or Access) on the following portable media.
- Client documents that are transported between locations or created in the field **must** be secured in a way that protects the client's information (e.g., a locked briefcase, or any other apparatus with a locking mechanism).

8.5.3. Security Auditing

DPALs or designated agency staff are required to resolve any issues uncovered during an HMIS Partner Agency monitoring. To maintain the highest level of security and protect client privacy and confidentiality as set forth in this manual, HMIS Lead Agencies will audit each Partner Agency's HMIS security compliance on an annual basis. DPALs will work with HMIS Lead Agencies to schedule and assist in the monitoring process. The monitoring will cover many topics (e.g., informed consent procedures, privacy and security practices, data entry practices) that are made available in the COHMIS Partner Agency Monitoring Protocol. More information about these audits can be found in the COHMIS Security, Privacy and Data Quality Manual. Any identified deficiencies need to be resolved within the guidelines of the COHMIS Security, Privacy and Data Quality Manual.

9. HMIS Reporting and Access

9.1. HMIS Reporting

Reporting is an important functionality of all databases. It is important that participating agencies see the benefits of entering data into HMIS and have the ability to use the information entered. HMIS has a robust suite of reports available to users, including application reports, management reports and ad-hoc reports. HMIS Leads will provide information and training on reporting options available to your agency.

9.2. Ownership of Client Level Data

The CoC and HMIS Lead Agency are the custodians of client-level data that is entered in HMIS. The client is the owner of the data. Consequently, neither the CoC nor the HMIS Lead Agency will at any time change, distribute or delete such data without the permission of the agency overseeing that data. If an agency withdraws from participation in HMIS, its data will be kept for a minimum of seven years after withdrawal and may be included in CoC reporting or analyses. The HMIS Lead Agency reserves the right to use HMIS aggregate level data (i.e., data that is aggregated across all agencies participating in HMIS and that cannot be traced to individual clients) for the purposes of CoC management, reporting, decision making and analysis.

9.3. Access to CoC-Wide Data

CoC-wide data can play an important role in advancing the community's understanding of its homeless and at-risk populations. This information can help in planning future service offerings, identifying gaps in community services, analyzing the effectiveness of programs, and developing local and statewide policies that reduce the length of homeless episodes, decrease returns to homelessness, and ultimately make homelessness rare, brief, and one-time. To realize these benefits, the HMIS Lead agency may share HMIS aggregate level data with agency collaborations, state and local officials and researchers. All requests for aggregate level data must be initiated with the HMIS Lead Agency.

9.4. Distribution of HMIS Data

Agencies can choose when and if they are going to distribute aggregated data, as appropriate. If they need assistance running reports, they should contact their COHMIS Helpdesk.

Requests for data aggregated across the entire CoC should be sent to the CoCs HMIS Lead Agency. Once vetted, the HMIS Lead Agency will process the request along with a fee and time estimate, if appropriate.

Requests for data aggregated statewide should be submitted to the CoC HMIS Lead Agency, who will work with the other CoC HMIS Lead Agencies to vet and process along with a fee estimate, if appropriate.

Requests for identifying data across a group of participating agencies should be coordinated between individual agencies via signed releases of information and submitted to HMIS Leads for reports to be run in accordance with the groups' reporting goals.

At any point the HMIS Lead agencies reserve the right to decline requests for aggregated data and will bring any further escalation for aggregated data to the HMIS Statewide Collaborative for review, by which the Collaborative will make a decision on the request with a majority vote.

Requests for personally identifiable information (PII) from HMIS and participation in activities where PII is shared, such as Case Conferencing, may be reviewed and approved based on the discretion of the HMIS Lead agency. If requested to review by the HMIS Lead agency or an outside entity, the HMIS Statewide Collaborative will make a decision on the request with a majority vote. Requests will be responded to through written determination to either grant access or deny permission.

9.5. Funder Access

Entities providing funding to agencies or programs that are required to participate in HMIS will not have access to HMIS for the sole reason of entering into a grant agreement with an agency or program. The funder may request HMIS aggregate, de-identified data from its grantee. The grantee will produce the report or submit a request to the HMIS Lead Agency, if needed. If the funder requires data aggregated across multiple grantee agencies, its agreement with each grantee must state that the funder has the agency's permission to acquire such data. These aggregate requests may be submitted to the respective CoC, which will require proof of the contracts between the grantees and the funder. Time and fees, if any, will be determined by the HMIS Lead.

Entities providing funding to agencies or programs that are required to participate in HMIS may enter into a data use agreement with one or more HMIS lead agencies in order to gain access to either anonymized or personally identifying row-level data from HMIS on an ongoing basis through Looker, the REST API, or other methods that facilitate high-frequency data extraction with or without the active input of a Collaborative Lead. The agreement will stipulate, at a minimum, that policies and procedures will be established to govern secure use of the data and that the data will be used with the intent to provide better experiences for persons experiencing homelessness. Such data will generally be used to improve outcomes for persons experiencing homelessness while reducing reporting burdens for grantees.

9.6. CoC Access

The HMIS Lead Agency will provide monthly Data Quality Reports, Participation Reports and any reports necessary to support CoC funding processes. CoC-wide data will be provided to HUD annually as required for the LSA report, system performance measures and CoC grant applications.

The CoC reserves the right to publish a participating agency's aggregate data for the purposes of data quality improvement, compliance, analysis or decision making.

The four COHMIS Lead Agencies may also combine their aggregate data into a statewide report or dashboard for a view of homelessness across Colorado as a whole.

9.7. Researcher Access

The Colorado HMIS Statewide Collaborative and Colorado HMIS Lead Agencies recommend that prior to obtaining HMIS data, academic and/or professional researchers must execute written research agreements with the CoC(s) or the participating agencies from which data is sought. COHMIS requires that written research agreements address the rules for data use, the limitations of the data, how the data will be stored, and data security and disposal procedures. Data requests that do not require personally identifiable information may not require a research agreement. Requests for statewide data that is not already publicly available will be considered by the HMIS Leads, who meet regularly, unless the Leads decide to involve the HMIS Statewide Collaborative, by which the decision would be made at a monthly or quarterly HMIS Statewide Collaborative meeting.

Requests for CoC data will be made by each CoC HMIS Lead Agency. Time and fees will be determined by the HMIS Lead.

9.7.1. Anonymization of Data

Only Anonymized Data will be released to researchers. The provider shall remove all personal identifiers which can be used to distinguish or trace an individual's identity. Personal identifiers shall include those consistent with a HIPAA Limited Data Set, which include full name, date of birth, social security number and all contact information (including phone number and residential address smaller than town or city).

9.7.2. Cell Suppression Policy

The Cell Suppression is the amount of observations needed to display the desired data results. The Policy stipulates that no cell (e.g., grouping of individuals, patients, clients) may be displayed without the number of observations predetermined by the provider. Also, no use of percentages or other mathematical formulas may be used if they result in a cell displaying less than the predetermined amount of observations. Individual level records may not be published in any form, electronic or printed. Any data that returns 5 or less observations is considered too small a sample size to use safely. Agencies who feel that their data is still vulnerable may request a larger observational minimum.

9.8. Release of HMIS Data by Participating Agency

All participating agencies are responsible for ensuring the confidentiality of the information held in Colorado's HMIS database. Each agency is responsible for ensuring that all data within HMIS is held to the strictest confidentiality standard possible.

Release of Information Policy:

- Partner Agencies may disclose information that was not obtained from HMIS (i.e., information that an agency develops through its own administrative or research efforts, without accessing HMIS) as they see fit. However, except as specified in the next paragraph, Partner Agencies should never release data or information obtained from HMIS to any party without the permission of their HMIS Lead Agency.
 - If required by any court of competent jurisdiction in the state of Colorado, Court orders should be directed to the CoC.

At no time should hard copies or electronic copies of HMIS forms be released without the permission of the HMIS Lead Agency. If a Partner Agency receives a request for HMIS information, the requestor must be directed to contact the HMIS Lead Agency. Should a Partner Agency find that there has been an unauthorized release of data obtained from HMIS, it must contact the HMIS Lead Agency immediately and no later than one business day after the date of discovery. Failure to do so will be considered a breach of this policy.

Agencies may share information obtained from COHMIS under the following circumstances:

- In an immediate life-threatening situation that involves a staff member or a client in the agency's care;
- If a staff member or volunteer suspects abuse or neglect of a child, a dependent adult, or elderly person.

In the above situations, Partner Agencies should follow internal protocols and send an incident report to the HMIS Lead Agency within one business day.

Procedure in the Event of a Breach:

- Should it be determined that an agency released information without receiving permission from COHMIS, an investigation will be conducted by a committee comprising members of the CoC where the breach occurred (one member of the CoCs Lead Agency staff, one member of the CoCs HMIS Lead

Agency staff, and one member of the CoCs Board of Directors) and a representative of the Statewide Collaborative from one of the other three Colorado CoCs. The findings of the investigative committee will be presented to the CoC Board of Directors and to the Statewide Collaborative. Each CoC Board of Directors will be responsible for determining consequences in the event of a breach. If it is found that a policy breach did occur, the consequences may range, without limitation, from revocation of database privileges up to and including the suspension of the agency's HUD NOFA funding.

9.9. Direct Access to HMIS by Outside Entities

The Colorado HMIS Statewide Collaborative is committed to finding safe, efficient and appropriate access to the Colorado HMIS System. Direct Access to HMIS is limited based on need, State and Federal Law and Policy, and stated intention. Direct HMIS access may be requested by outside entities with appropriate agency partnership agreements and following the required training content.

Access requests must be handled with care to ensure our client's Personally Identifiable Information (PII) is only shared with the entities who have the need to know the information. Colorado's CoCs shall direct all data requests through their HMIS Leads to make certain the request is appropriate for the intended recipients and necessary to accomplish the stated task. Requesting entities will work with the HMIS Leads, and at the highest level the HMIS Statewide Collaborative, to establish deadlines and priorities to ensure access requests are evaluated in a timely and purposeful manner.

Access Requests:

- A. All HMIS Access requests shall go through your region's HMIS Lead. Access requests received by HMIS or CoC participating Agencies will be referred back to the HMIS Leads for proper re-routing and approval.
 - i. Balance of State Continuum of Care HMIS Lead: 54 Rural and Frontier County Requests (Morgan, Logan, Sedgwick, Phillips, Washington, Yuma, Elbert, Lincoln, Kit Carson, Cheyenne, Crowley, Otero, Kiowa, Bent, Prowers, Baca, Pueblo, Las Animas, Huerfano, Fremont, Chaffee, Custer, Lake, Clear Creek, Gilpin, Park, Teller, Alamosa, Saguache, Costilla, Conejos, Mineral, Rio Grande, Montrose, Delta, Ouray, San Miguel, Gunnison, Hinsdale, La Plata, Montezuma, Dolores, San Juan, Archuleta, Mesa, Moffat, Rio Blanco, Garfield, Eagle, Pitkin, Summit, Routt, Grand & Jackson Counties)
 - ii. Metro Denver Homeless Initiative (MDHI) HMIS Lead: Metro Denver Requests (Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, and Jefferson Counties)
 - iii. Northern Colorado CoC HMIS Lead: Weld and Larimer County Requests (Weld & Larimer Counties)
 - iv. Pikes Peak Community Health Partnership HMIS Lead: El Paso County Requests (El Paso County)
- B. HMIS Leads shall confirm all related agreements including Agency Partnership Agreements (APA's), Contracts and Memorandum of Understandings (MOU's) are signed and understood by all parties prior to moving forward with granting access to the system.

- C. HMIS Lead agencies will work with approved agencies to determine the level of access based on program type, location, data they need to access, and data they are allowed to share based on funding requirements.
- D. Participating entities must follow all requirements around training, privacy and security as outlined in the HMIS Statewide Policies & Procedures, the HMIS Security, Privacy and Data Quality Plan and their agency partnership agreement. Refer to Appendix A: Sanctions for Violations for information on the steps that occur when an individual/agency violates the COHMIS APA, P&P and Security, Privacy and Data Quality Plan.
- E. Changes to the privacy notice, including this policy, are retroactive across the Statewide Policies and Procedures and Data and Privacy and Security Plan.

Access Restrictions

9.10. Law Enforcement

No active member of law enforcement, detention/corrections staff or non-enforcement employees housed within a law enforcement entity will be granted direct access to HMIS. This means no representatives of the below agency-types shall be trained in HMIS or provided end-user access. This includes, but is not limited to the following entities:

- Law Enforcement (Local, State & Federal)
- Transition specialist in jail/prison (even when sole purpose is rehabilitation)
- Court related positions
- Parole/Probation Officers
- Non-enforcement staff employed by any of the above agency types

The HMIS Lead Agency Colorado HMIS Statewide Collaborative and the HMIS Lead reserves the right to enforce this policy and deny access to HMIS to any agency/entity that is deemed to potentially cause harm to clients that are entered into the HMIS System.

9.11. Public Health Agencies during a Public Health Emergency

Public Health Agencies (PHAs) coordinating a response to a Public Health Emergency can either request information directly from COHMIS or have direct limited access to HMIS for the purpose of providing necessary care and coordination for individuals experiencing or at risk of homelessness during the Public Health Emergency. HMIS Leads are responsible for providing education about HMIS and coordinating with the Public Health Agency regarding level of access needed, Agency Partnership Agreements, all required HMIS training, appropriate access level and following all HMIS privacy and security Policies and Procedures to best protect the clients in accordance with the law. This includes, but not limited to, sharing client information in HMIS to anyone outside of employees with a need to know within the Public Health Agency.

Access can be revoked at any time, including or limited to the following reasons:

1. The end of the Public Health Emergency at the Federal and/or State level;
2. Violation of HMIS Agency Partnership Agreement(s);
3. Violation of the HMIS Release of Information; and
4. Sharing of information that has not been authorized and/or puts a client and/or their household at risk

10. Coordinated Entry

10.1. Definition of Coordinated Entry

Coordinated entry is a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs. This document answers several frequently asked questions about coordinated entry and HMIS²⁹.

10.1.1. Background

HUD requires each CoC to establish and operate a “centralized or coordinated assessment system” (referred to as “coordinated entry” or “coordinated entry process”) with the goal of increasing the efficiency of local crisis response systems and improving fairness and ease of access to resources, including mainstream resources. Both the [CoC Program Interim Rule](#)³⁰ and [ESG Program Interim Rule](#)³¹ require use of the CoCs coordinated entry process, provided that it meets HUD requirements.³² Coordinated entry processes are intended to help communities prioritize people who are most in need of assistance. They also provide information to CoCs and other stakeholders about service needs and gaps to help communities strategically allocate their current resources and identify the need for additional resources. The CoC Program interim rule set the basic parameters for coordinated entry and left further requirements to be set by HUD notice. Since the CoC Program interim rule was published in 2012, HUD has learned a great deal about what makes a coordinated entry process most effective and has determined that additional requirements are necessary. Updated [guidance is available from HUD on best practices on data management](#)³³.

10.1.2. Coordinated Entry in Colorado

Coordinated entry operates differently across the four CoCs in Colorado. Each CoC has a specific coordinated entry policy and procedure manual to be used in conjunction with the COHMIS Statewide Policies & Procedures.

- In Metro Denver, the coordinated entry system is called OneHome and more information is available at www.onehomeco.org
- In El Paso County, the coordinated entry (CE) system information is available at <https://www.ppchp.org/programs/continuum-of-care/coordinated-entry-ce/>
- In the Balance of State, the coordinated entry system is governed by CoC-wide P&P’s and tailored to each regional coalition. More information is available at <https://www.coloradocoalition.org/BoSCoCCES>.
- Connect with your regional coalition by contacting your representative!
<https://www.coloradocoalition.org/BoSCoCGetInvolved>
- In Northern Colorado, the coordinated entry system is called Coordinated Assessment and Housing Placement System (CAHPS) and more information is available at <https://www.nocococ.org/cahps>

²⁹ HUD: [HUD Exchange: Coordinated Entry and HMIS FAQ](#):

<https://www.hudexchange.info/resources/documents/Coordinated-Entry-and-HMIS-FAQs.pdf>

³⁰ HUD: [CoC Program Interim Rule](#): <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

³¹ HUD: [ESG Program Interim Rule](#):

<https://www.hudexchange.info/resource/1927/hearth-esg-program-and-consolidated-plan-conforming-amendments/>

³² HUD: Authority established in [24 CFR 578.7\(a\)\(8\)](#)

³³ HUD: [Coordinated Entry Management and Data Guide](#):

<https://www.hudexchange.info/resources/documents/coordinated-entry-management-and-data-guide.pdf>

HEART TRAINING SCHEDULE - Model Framework						
		Staff	TRAINING FOCUS	Day	Start	End
Week 1	Onboarding	HEART 10		Mon-Fri		
		HEART 10	HR onboarding	Mon		
		HEART 1	Field Introduction	Tues		
		HEART 10	CJIS	Wed-Thur		
		HEART 10	HMIS	Wed-Thur		
		HEART 10	One Home	Wed-Thur		
Week 2	Ride Alongs	S42 (Baca)	DCSO Introduction	Mon		
		HEART 1	Mission and values	Tues-Thur		
		HEART 1	Expectations	Tues-Thur		
		HEART 1	Safety and response protocols	Tues-Thur		
			Dispatch day			
Week 3	Ride Alongs	HEART 10	Admin	Mon		
		HEART 2	Resource navigation and partners	Tues-Thur		
		HEART 2	Shield Force and location awareness			
		HEART 2	Business engagement			
Week 4	Ride Alongs		Holiday	Mon		
		HEART 1	Case management	Tues		
		HEART 1	HMIS/Reporting	Wed		
		HEART 1	Radio usage	Thur		
		HEART 1		Fri		
Week 5	DCSO		Ride Along	Mon		
		HEART 10	Case Management	Tues		
			Ride Along	Wed		
			Ride Along	Thur		
Week 6	Certification		Ride Along	Fri		
		HEART 1	Certification	Mon		
			Ride Along	Tues		
			Celebration/Ride Along	Wed		
			Ride Along	Thur		
CERTIFICATION REQUIREMENTS						
HR Orientation						
CJIS						
HMIS						
One Home						
CRS Apps						
DEI						
Field Evaluation						
CPR						
Self Defense						
Bike Training						

Talent Center Trainings

For Starters: Gender
 For Starters: Intersectionality
 For Starters: Neurodivergence
 For Starters: Disability
 For Starters: Sexual Orientation
 For Starters: Belonging
 For Starters: Equality
 For Starters: Inclusion
 For Starters: Equity
 For Starters: Diversity
 What is Integrative Negotiation Strategy? Bob Bordone
 What is the Best Negotiation Strategy? Bob Bordone
 What is Distributive Negotiation Strategy? Bob Bordone
 Microsoft Teams Next Generation Playlist
 Microsoft Sharepoint