

VERMONT HMIS

STATEWIDE DATA SHARING FAQ

1. **What is Statewide Data Sharing:**
 - a. Statewide data sharing is the ability to disclose client personal identifiable information (PII), services, program enrollments, shelter stays and other data from one HMIS organization to another HMIS organization inside of HMIS across the State of Vermont.

2. **It is already challenging to explain to clients that their data is shared with other agencies, so won't expanding who it is shared with make it more challenging?**
 - a. We understand this can be difficult. The CE Committee has created a training to help agencies explain and present the ROI/data sharing agreement.
 - b. Additionally, it is the expectation (and stated in the HMIS policy and procedures manual) that users only access client data if the client is receiving services from the agency. Users sign an agreement every year agreeing to this.

3. **Will Statewide Sharing mean there is only one CE list in VT?**
 - a. No, local CoCs will still have their own CE Master List. Clients will only be on their CE master list if the client has an entry/exit into their local CE provider by the local CoC lead or partner agency. Other agencies outside of your local CoC cannot add clients to your local CoC CE master list.

4. **Will Statewide Sharing mean I don't have to talk to another CoC if a client wants to be added to another local CoC master list?**
 - a. No, communication and coordination between local CoCs outside of HMIS is still important.
 - b. Clients will only be on their CE master list if the client is entered by the local CoC lead agency with an Entry/Exit. Other agencies outside of your local CoC cannot add clients to your master list.
 - c. Chittenden's master list only includes those that are physically residing in Chittenden. Clients residing in Chittenden could be on the Chittenden Master List and other BoS local CoCs.
 - d. Statewide sharing will allow updates to be made on a shared client record for all local CoCs to see.
 - i. **For example**, if a client is currently in Addison working with Charter House (CHC) but the client would also like to find housing in Rutland: CHC would complete the CE assessment and ROI with the client, call HPC (the CE agency in Rutland) to let them know the client is interested in housing opportunities there. Then, HPC and CHC would decide who is working with the client. If CHC works with the client to help them gain SSI, CHC could update that information in HMIS, and the change would be reflected so that new information would show for both local CoCs. This will be reflected/show on both local CoC's list, which will reduce duplication of effort, staff time and allow one point of contact for the client.

5. **If a client wants to transfer to another local CoC CE Master list, can I just click a button to do this?**
 - a. No, communication and coordination between local CoC outside of HMIS is still important.
 - b. Clients will only be on their CE master list if the client is entered by the local CoC lead agency or assessment partner agency with an Entry/Exit. Other agencies outside of your local CoC cannot add clients to your master list.
 - c. Statewide sharing doesn't change the client transfer policies. If a transfer is approved outside of HMIS, you could see the client data in HMIS with statewide sharing, rather than creating a new client record.

6. **Will other agencies and users be able to delete our data if we share data statewide?**
 - a. No, only users that have access to your agency's providers, and system admins, can delete data. There is an audit trail that provides who deleted/entered data, what was deleted/entered and when it was deleted/entered.

7. **Will other agencies enter invalid/inaccurate data that impacts our reporting?**
 - a. It is possible that data entered by another agency would show up in your reporting. This is currently how our system is set up at the local level. This can be a benefit and a challenge. The benefit would be if another agency updates a client's income, your agency would not have to do that update to have it reported. The downside is that if the update is done incorrectly, it would need to be fixed by the other agency, so it is accurate in your reporting. ICA is able to help coordinate the corrections.

8. **There are many users in the HMIS system. How do I know other HMIS users won't misuse the data? Can we trust all HMIS users?**
 - a. All HMIS users sign an agreement to adhere to the VT HMIS policy and procedures.
 - b. All HMIS users participate in an annual security training.
 - c. It is strongly encouraged that agencies do background checks on their HMIS users.
 - d. It is the expectation that users only look up clients they are working with or will be serving. This is highlighted in our VT HMIS policy and procedures manual.
 - e. As the system administrator, ICA can run audit reports on all activities happening in the system. If you are concerned about a user looking into data they shouldn't be, you can reach out to ICA to investigate possible misconduct.
 - f. ICA staff all have completed extensive background checks.

9. **Does Statewide Sharing mean my client has to share their data?**
 - a. No, statewide sharing gives the client choice on how they would like to share their data. Statewide sharing is the default when creating a new client record, however sharing can be limited to only the agency entering the data, if the client requests this. This is currently how our system is set up but statewide sharing would be on a larger scale.
 - b. If a client wants to limit data sharing and be part of CE, the client would manually be added to the local CE Master list.

10. Is all the client data in HMIS shared statewide?

- a. All HUD required data elements and custom (including CE, HOP, FSH, etc.) assessment questions would be shared statewide.
 - i. There are options to share additional items (such as services, file attachments, notes, etc.). If additional items are not shared, only the agency adding/creating an item would see it.

11. How does HIPAA impact data sharing?

- a. In addition to meeting all the HUD HMIS privacy and technical standards, the HMIS software is fully [HIPAA](#) and [HITECH](#) Act compliant. This means that while the HMIS does not serve as an Electronic Health Record (EHR), it has the same privacy and security standards as an EHR software.
- b. HIPAA compliance is specific to each organization. If the organization is a Health Plan, Health Care provider or a Health Care Clearinghouse, then there are activities performed by the organization that would require compliance with HIPAA. Additionally, certain organizations working those agencies to perform services that involve the use of protected health (PHI) may be considered a Business Associate. Those organizations will also follow HIPAA under a [Business Associate Agreement \(BAA\)](#).
- c. HIPAA and HITECH do not prohibit data sharing for any organizations covered under those rules, and in most settings where HIPAA and HITECH do apply, robust data sharing occurs with the necessary uses and disclosures. In many health systems, for example, the services provided by a multitude of vendors can result in the PHI of patients being shared with hundreds, potentially thousands of organizations.
- d. While the HMIS is fully HIPAA and HITECH compliant, the data collection and sharing that occurs within the system is not required to follow those acts. With the appropriate documentation of uses and disclosures to the participants, publicly available privacy policies, and documentation of those organization covered by the system, data sharing can occur within HMIS.

12. Who will benefit from Statewide Sharing?

- a. The client will benefit by having more options for sharing and have the option to avoid going through an extensive intake process when accessing agencies across different local CoCs.
- b. Agencies will benefit by having a simplified intake process for existing clients. For example, no more hunting for SSNs if the client has been served anywhere in the state, less need for the difficult intake questions. Interim update information will be reflected in all agencies' files.
- c. CoCs and local CE will benefit by being aware that a client is now being served in another CoC.
- d. ICA will benefit by having a single client record across the entire state which will simplify HUD reporting.
- e. HUD will benefit by the Balance of State having more accurate reports and having less opportunity for errors in HUD reporting due to fewer duplicate client records. It could also mean less clean up for agencies with fewer duplicate (hidden) records.
- f. In the long term, statewide sharing will benefit clients, Vermont HMIS users, CoCs, and by having a single shared (client choice) client record.

Example scenarios that would benefit from Statewide Sharing:

1. A client wants to be on more than on local CoC CE Master List.
2. A client moves/transfers from one local CoC to a new local CoC.
3. Proving homeless history when applying for vouchers.
4. Statewide providers would be able to have one client file.

13. What are the implications of Statewide Sharing for ICA?

- a. In the short term, since HMIS has been a closed system, it will be more work for ICA to transition to statewide sharing. When duplicate client files are identified, ICA would need to merge those records into one record. As of summer 2021, there were over 30k duplicate client records in the VT HMIS.

14. Does agreeing to Statewide sharing mean all past data will be automatically shared with everyone?

- a. No, only new clients added to the system after a specified date will default to being shared statewide. Clients already in the system will need to be “opened up” once an updated ROI is signed. The current ROI and updated ROI will include sharing data retroactively. ICA would help open up the client records once the new ROI is signed.

15. Does agreeing to share statewide mean Chittenden and BoS CE process will need to be the same?

- a. No, each HUD CoC can have their own CE prioritization process.

16. Does agreeing to share statewide mean my agency data will be shared with NH?

- a. No, the Vermont HMIS Advisory Committee is looking at sharing data only within the state of VT.
- b. Since both states voted for a joint HMIS system, there is a *possibility* for sharing between VT and NH in the future.

17. Do other states use statewide sharing in their HMIS systems? What can we learn from their experiences?

- a. Yes: Currently the majority of implementations that ICA works with use implementation-wide, or statewide sharing in their HMIS systems. Many of the other implementations have a larger number of clients served than the state of Vermont. Additionally, there are many other states that have statewide, or implementation-wide sharing that are not served by ICA: Ohio, Colorado, Connecticut, Maine, Rhode Island to name a few. See the attached information other states have shared about their experiences.
- b. I’m still not sure I fully understand statewide sharing or if I think it’s a good idea. How can I get more information?
- c. Reach out to the HMIS Advisory Committee by emailing the ICA helpdesk: VTHMIS@icalliances.org