# Three County Continuum of Care Data Quality Plan

CAPV (Community Action Pioneer Valley) Clarity HMIS

**5/3/23**

## Contents

What is a DQ Plan? ...........................................................................................................................................2

What is Data Quality .........................................................................................................................................2

Why do we need a DQ Plan? .............................................................................................................................2

Roles & Responsibilities ..................................................................................................................................3 Agencies .....................................................................................................................................................3 CoCs ...............................................................................................................................................................3

HMIS Lead .....................................................................................................................................................3

Components of a DQ Plan ...............................................................................................................................4 Timeliness ..................................................................................................................................................4 Completeness & Consistency .......................................................................................................................4 Accuracy.........................................................................................................................................................4 Monitoring .................................................................................................................................................4 Incentives and Enforcement .........................................................................................................................4

Training .........................................................................................................................................................5

Data Quality Benchmarks and Goals ................................................................................................................5

Timeliness ..................................................................................................................................................5 Coordinated Entry: ..................................................................................................................................5 Emergency Shelter: .................................................................................................................................6 Street Outreach: .......................................................................................................................................6

Transitional Housing:...................................................................................................................................6

Permanent Housing Projects (Including Rapid Re-Housing and Permanent Supportive Housing): .................6

Services Only and Other Project Types Not Listed..........................................................................................6

Additional Timeliness Considerations ............................................................................................................6

Completeness ...............................................................................................................................................7 Completeness: Clients Served ..................................................................................................................7

Completeness: Bed Utilization .................................................................................................................7

Accuracy........................................................................................................................................................8

Monitoring .......................................................................................................................................................9 Agency Monitoring........................................................................................................................................9 CoC Monitoring.............................................................................................................................................9

Statewide Monitoring...................................................................................................................................9

Incentives and Enforcement ............................................................................................................................9 Agencies .....................................................................................................................................................9 CoC ................................................................................................................................................................9

Statewide ......................................................................................................................................................9

Training..........................................................................................................................................................…10 Implementation Plan .......................................................................................................................................10

**What is a DQ Plan?**

A data quality plan is a document that helps guide the CoC in attaining the most valid and reliable data possible. The plan identifies benchmarks for data quality, identifies the roles and responsibilities of all parties responsible for data quality, and includes procedures and timeframes for implementation and monitoring.

## What is Data Quality

Data quality is a measurement of the reliability and validity of client-level data gathered and entered into the HMIS. Several factors influence good data quality: timeliness of entry, completeness of the data, and accuracy of the data. Adhering to a strong data quality plan will ensure better outcome reporting, easier submissions of grant performance reports such as the HUD Annual Performance Report (APR), and supports the submission of the Longitudinal Systems Analysis (LSA) and System Performance Measures Report (SPMs).

**Why do we need a DQ Plan?**

Data quality is critical to the work of ending homelessness in Hampshire, Franklin, and Berkshire Counties. Along with the mandate that federally funded projects must enter data into HMIS, the database allows for much more than just meeting a requirement. Good data quality helps agencies, CoCs, the Coordinated Entry System, local municipalities, and the state report on performance outcomes, allows for case managers to have all of the information necessary to help their clients, and provides a way to view system performance overall. When data quality is not where it should be, it affects the entire system. It can impact clients who may have to spend time correcting erroneous information with a case manager. It can negatively impact overall data quality scores for the CoC which could affect competitiveness in the HUD NOFO competitions. It could also impact an agency’s ability to continue receiving funds from federal sources if consistently poor data goes to HUD in required reports. Data is a driving force in being able to end homelessness and having a strong Data Quality Plan can help the entire region improve.

## Roles & Responsibilities

### Agencies

Individual agencies are at the front line of good data quality. Fostering a culture that uses data to make programmatic decisions will also encourage staff to enter data accurately, completely, and timely. Project staff can run the Program Data Review report for their project to quickly identify any necessary additions or corrections. Agency HMIS Administrators and Managers can run the Monthly Staff Report to get a sense of how the agency’s data quality appears as a whole and by staff member. The Agency HMIS Administrator or Manager should run the report as often as possible to catch issues before they become problematic, with the recommendation that the report is run and reviewed at least once every two months. This includes doing client file spot checks to ensure the data in a client file matches what was entered into HMIS once or twice a year, at least once a year prior to annual performance reports for HUD funded projects and twice a year if able. Client file spot checks should involve randomly selecting 10 clients enrolled currently or within the past year (or 50%, whichever is lower for each project) and comparing what has been entered in HMIS with what exists in their client files.

When agencies determine someone is struggling to maintain good data quality, they should strongly consider sending the staff person for additional training.

### CoC

The Data & Evaluation Manager, on behalf of the Continuum of Care, should regularly review data quality reports for each project every 3-6 months and the HMIS Data Quality Report to analyze data quality within the entire HMIS. Because data quality is critical to the operation of the entire system, all projects in the CoC should be included in the reporting, not just HUD Funded projects. The Data & Evaluation Manager should follow up with agencies as needed to suggest corrections or training.

### HMIS Lead

The HMIS Lead ensures the HMIS is operational and able to meet the specifications outlined by HUD and other federal partners. Additionally, the HMIS lead ensures that all required reports are available and functional in the system. Finally, the HMIS Lead will run and monitor data quality reports on a system-wide level and produce dashboard reports bi-annually to be included in the CoC’s quarterly newsletter.

## Components of a DQ Plan

### Timeliness

Best practices for entering data into HMIS indicate that data should be entered in real time to reduce human error that can occur when there is a lag between data collection and data entry. Entering data real time, or as close to real time as possible, ensures data is available whenever it’s needed—including for grant reporting and overall system monitoring.

### Completeness & Consistency

In order to provide the best possible service to people experiencing homelessness, complete and consistent data is critical. While HUD has not provided specific percentages of acceptable rates of missing or unknown data, there are generally accepted data standards that encourage no more than 5% of a given data element to have missing or unknown data. The goal, however, is 100% completion whenever possible and 100% collection is expected by state funders such as the Executive Office of Health and Human Services (EOHHS). Complete data also includes entering the data for all clients served. Additionally, complete data also refers to the completeness of bed utilization in the system. Consistent data refers to agencies collecting data using the same definitions and entering data that has no contradictions. Consistent data has no values that are impossible: child veterans, as an example.

### Accuracy

Accuracy of HMIS data is also critical in being able to provide the best possible service to clients. This means that the data entered in HMIS matches the data in the client’s case file. This standard is the most difficult to monitor as it requires comparisons between the HMIS record and corresponding evidence in a file. Having accurate data ensures that HMIS will provide the most realistic representation of our homeless system at any given time.

### Monitoring

Monitoring data quality should be done at multiple levels. The primary and most important level is the Agency. Agency HMIS Administrators & Managers should run the data quality report for all of their projects at least every other month to quickly identify issues that need to be resolved. The CoC should also monitor data quality to be prepared for LSA, NOFO, System Performance Measures, project APRs, and any other CoC level reporting that may be necessary. Finally, the CoC will run and monitor data quality reports on a system-wide level and produce dashboard reports bi-annually to be included in the CoC’s quarterly newsletter.

### Incentives and Enforcement

Incentives and Enforcement of the standards in this Data Quality Plan help encourage and reinforce the importance of data to the homelessness system in our region. Agencies should create internal policies to help staff recognize the importance of good data quality and provide recognition of improvements. When agencies identify a particular staff member having difficulty with their data entry and data quality, the staff person can request HMIS training from the CoC/HMIS Lead.

### Training

The HMIS System Administrator/CoC Data & Evaluation Manager is responsible for providing training to all HMIS users in the CAPV Clarity HMIS. This training will cover all of the information a front-line staff person will need to ensure good data quality. Along with training, the CoC’s Data & Evaluation Manager is available to assist staff with any HMIS-related technical support they may need.

## Data Quality Benchmarks and Goals

### Timeliness

In an effort to have the most robust Homeless Management Information System possible, HMIS Participating Agencies need to adhere to timely data entry standards. HUD has also mandated that each Continuum of Care have specific standards in place to accurately reflect the number of people currently receiving homelessness related services throughout the system at any given time.

*Data entry should be current within the scheduled number of days from intake, exit, service provision, or any other client interaction which necessitates any form of data entry. The timeliness schedule is determined by type of program and client contact.*

**Best practices indicate that real-time data entry is the preferred standard as it leads to better data quality and a higher level of accuracy.** However, in the provision of homelessness services, real time data entry is not always possible, but entry deadlines must exist to ensure the system’s integrity. To that end, the Three County CoC Data Evaluation Committee has adopted the following timeliness standards by project type.

**Coordinated Entry:** All Coordinated Entry Assessment data, including Coordinated Entry System Enrollments, must be completed within 5 business days of the appointment; however real time data entry is preferable. This includes updating the appointment outcome from “referred” to the appropriate option as a result of meeting with the client.

**Emergency Shelter:** Emergency shelter data must be entered within 1-3 business days; however real time data entry is preferable. This includes entering intake data, client information updates, services provided, and client exits with an appropriate exit destination.

**Street Outreach:** Street outreach data must be entered within 1-3 business days. This includes intake/project entry data and client exits with an appropriate exit destination.

**Transitional Housing:** Transitional Housing data must be entered within 3-5 business days. This includes intake/project entry data, periodic assessments, and client exits with an appropriate exit destination.

**Permanent Housing Projects (Including Rapid Re-Housing and Permanent Supportive Housing):** All data entry must be entered within 5 business days. This includes intake/project entry data, periodic/annual assessments, and client exits with an appropriate exit destination.

**Services Only and Other Project Types Not Listed**: All data entry must be entered within 5-7 business days. This includes intake/project entry data, periodic assessments, and client exits with an appropriate exit destination.

### Additional Timeliness Considerations

Timely data entry also includes correcting any data quality issues if notified by a representative of the CoC,

HMIS System Administrator. In the event an agency’s HMIS Administrator/Manager receives notification of data issues needing rectification, the corrections must be made within 5 business days. If the issues are extensive and will take more than 5 days, the Agency must provide a reasonable estimate of the time necessary to correct the data. If an Agency HMIS Manager/Administrator is out of the office due to vacation, illness, etc., there must be an alternate contact person at the organization who can respond to the request or let the requestor know when a response will be received.

### Completeness

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Universal Data Elements by Program Type**  **Benchmark for % Null/Missing and % Unknown/Don't Know/Refused (percentage not greater than)** | | | | | | | | | | | | | | | |
| **ES** | | **TH** | | **PH** | | **SSO** | | **Safe Haven** | | **Outreach** | | **Prevention** | | **Rapid Rehousing** | |
| **Universal Data**  **Element** | %    Null    /    Missing | %    Unknown  /    Don't    Know  /    Refused | %    Null    /    Missing | %    Unknown  /    Don't    Know  /    Refused | %    Null    /    Missing | %    Unknown  /    Don't    Know  /    Refused | %    Null    /    Missing | %    Unknown  /    Don't    Know  /    Refused | %    Null    /    Missing | %    Unknown  /    Don't    Know  /    Refused | %    Null    /    Missing | %    Unknown  /    Don't    Know  /    Refused | %    Null  /    Missing | %    Unknown  /    Don't    Know  /    Refused | %    Null  /    Missing | %    Unknown  /    Don't    Know  /    Refused |
| 3.112 Name | 1% | 1% | 1% | 1% | 1% | 1% | 1% | 1% | 1% | 1% | 1% | 1% | 1% | 1% | 1% | 1% |
| 3.2 Social | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.3 Date of | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.4 Raceh | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.5 Ethnicity | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.6 Gender | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.7 Veteran | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.8 Disabling  Condition | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.10  Project  Start | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.11 Project  Exit Date | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.12  Destination | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.15 Relation to Head of Household | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.16 Client  Location | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.20 Housing  Move-in Date | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.917 A Living  Situation (ES,  SO, SH) | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |
| 3.917 B Living  Situation (TH,  PH, SSO, CE) | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% | 5% |

**Completeness: Clients Served**

100% of clients served should be entered into HMIS. If programs do not enter all of the data on the clients they serve, the HMIS data reports will not accurately reflect the reality of our homeless population size and the potential needs of our clients.

**Completeness: Bed Utilization**

Bed utilization for shelter programs measures the rate of beds used for shelter clients. Low utilization rates can indicate a program operating under capacity or it could be a sign that 100% of clients served were not entered into HMIS. Shelters should run their Current Housing Availability Report to monitor the utilization rates in HMIS.

### Accuracy

Data entered into HMIS must be valid. It needs to represent information on the people experiencing homelessness in the state accurately. Inaccurate data is worse than missing data as it can potentially change our understanding of a person’s homeless experience and their level of need. For example, if a program serves only individual adults, an individual infant record would likely be an inaccuracy. Agency HMIS Managers or Administrators should spot check the HMIS data against data in client charts at least once per year, twice if possible, as a means of ensuring accurate data was entered into the system.

## Monitoring

### Agency Monitoring

There are several reports in HMIS to help agencies monitor their data quality. These reports include the Program Data Review, Monthly Staff Report, and Client Project Stay Issues reports- each of these reports has functionality built in to allow for sub-report level data to provide client detail that will help users determine where their data errors are. The CoC also sends two data quality reports to each agency at least monthly, providing an overview of all data quality errors currently within that agency’s data in HMIS. These reports are the Client Level Data Quality – Gender, Race, Ethnicity, SSN, Name, DOB report and the Client Level Data Quality – Most Universal Elements report. Additionally, agencies can request custom data quality reports to be created and sent at regular intervals.

### CoC Monitoring

CoCs monitor data quality as a part of their annual evaluations. These evaluations lead to the rating and ranking of projects for HUD funding; therefore, it is critical to have the best possible data quality to help ensure a project gets all the review points associated with it.

### System-wide Monitoring

The CoC will create a data dashboard for quarterly analysis of data quality across the system. This will allow agencies to get a snapshot of the state of data quality without the need to run reports in HMIS. Additionally, the CoC will review data for inactive clients and will provide information to agencies on how to find their inactive clients so that they can be corrected.

## Incentives and Enforcement

### Agencies

Agencies should be creative to find ways of incentivizing excellent data quality. Actively monitoring data quality within the organization will lead to agencies being able to easily identify high performing staff, those who’ve shown great improvement and those who may still struggle with data entry. When an agency identifies a staff person continuing to struggle with their data quality, the option for additional training exists.

### CoC

CoCs incentivize data quality through their monitoring processes. The better the data quality, the better your data reflects the progress a program is making with their clients. This can lead to high monitoring scores which can lead to a higher rank for the HUD NOFO process.

## Training

The HMIS System Administrator is responsible for providing training to all HMIS Users in the Three County CoC. This training will cover all of the information a front-line staff person will need to ensure good data quality. Along with training, the CoC’s Data & Evaluation Manager is available to assist staff with any HMIS-related technical support they may need.

The HMIS System Administrator offers multiple training classes at least once year (more if necessary) and regular onboarding trainings as needed. These trainings will also be available on an as needed basis online through the CoC’s learning management system. The topics of these classes includes:

**Rapid Re-Housing, Transitional Housing, and Permanent Supportive Housing; Emergency Shelter; Coordinated Entry; HMIS Privacy & Security; and Reporting in HMIS.**

## Implementation Plan - Completed

Introduce Plan to HMIS Agency Representatives

Receive Feedback from HMIS Agency Representatives

Revise HMIS Policies & Procedures, HMIS User agreement, and HMIS Agency Agreement to include Data Quality and Privacy and Security Plan.

Continue to revise and edit Data Quality and Privacy and Security Plans with HMIS Partner Agency feedback

## Implementation Plan - To Do

Agencies become more comfortable with implementing requirements of the Data Quality and Privacy and Security Plans

Agencies have fully implemented the Data Quality and Privacy and Security Plans by December 31st, 2023.