

**Data Collection Policy**

**Version 2.0**

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## A. Introduction

The Calgary Homeless Foundation (CHF) has created this Homeless Management Information System (HMIS) data collection policy in order to demonstrate our firm commitment to fair and compliant data collection processes. The HMIS complies with the *Alberta Freedom of Information Protection of Privacy Act* (FOIP).

Agencies using the HMIS collect two types of information from clients accessing their programs or services:

- 1) Information that is mandatory for the agency's operation of their programs (the "Agency Mandated Information"); and
- 2) Information required by CHF for the agency to collect (the "CHF Mandated Information").

Agencies already have their own policies in relation to the collection of the Agency Mandated Information. Both those agency policies and this policy apply to the Agency Mandated Information. This policy also applies to the CHF Mandated Information.

**This policy establishes procedures that must be used when collecting Agency Mandated Information and CHF Mandated Information from clients accessing programs or services. Specifically, this policy sets out the information gathering and dissemination practices for collecting personal data from clients, storing personal data in the HMIS, and sharing personal data between agencies, for all agencies utilizing the HMIS: both CHF funded and non-funded. It is important to be aware of the fact that the HMIS is one of many business tools for client data storage in the Calgary System of Care.**

## B. Verbal notification of data collection

Effective November 1, 2013, agencies will use a verbal notification for data collection replacing the prior verbal notification. Written consent forms are still required to share collected personal information with external agencies or programs that are within Calgary's System of Care. Agencies will remain FOIP compliant so long as the following steps are taken:

1. The agency shall only collect information if that information relates directly to and is necessary for an operating program or activity of the agency (section 33(c) of the FOIP Act)
2. When information is collected from a client, it shall be collected directly from the client who shall be verbally notified as to
  - a. The purpose for which the information is collected;
  - b. The specific legal authority for collection (which is section 33(c) of the FOIP Act); and

- c. The title, business address and business telephone number of an officer or employee of the public body who can answer the individual's questions about the collection.

Below, is a prepared statement by the Government of Alberta, Ministry of Human Services, which must be read to clients before their data is entered into HMIS:

*This personal information is being collected under the authority of Section 33(c) of the Freedom of Information and Protection of Privacy ACT (FOIP) and/or in accordance with any applicable agreements in place. All personal information collected during the registration process, during the course of the client's stay, and for participation in any programs will be used to provide services and ensure a safe and secure environment for all our clients. It will be treated in accordance with the privacy provision of Part 2 of the FOIP. Limited information may also be provided to the Minister of Human Services for the purpose of carrying out programs, activities or policies under his administration (e.g. research, statistical analysis) or for receiving provincial and/or federal funding. If you have any additional questions or concerns, please contact the Agency Administrator.*

**Agencies are to ensure that this statement is available and read to all clients by staff prior to collecting client data and/or entering client data into the HMIS.**

### C. Special considerations: HMIS data collection process

#### Anonymous clients

Funded agencies with provincial and federal contracts with the CHF can no longer input anonymous clients into the HMIS. Clients at these agencies are benefiting from a government program and are being funded using public dollars, and therefore the government has a degree of responsibility to the public to be able to audit the program and prove that clients are being accounted for. If a client refuses to answer any of the Universal Data Elements (UDE's) or assessment questions required by the Government of Alberta or the Federal Government, then the staff member must put "Declined to Answer" in the required fields.

Non-funded agencies will still be able to enter clients as anonymous at their own discretion, however they should consult with their funders first.

## Aliases

Funded agencies should seek to obtain legal names only and avoid aliases whenever possible. However, the CHF and our funders recognize that client aliases can and will be used by funded agencies from time to time. Non-funded programs should consult with their funders first in relation to the use of aliases.

## Intoxication and Mental Health Considerations

When serving clients who are unable to understand the verbal notification due to mental health issues or intoxication, agency staff should defer to their agency's policy with regards to the collection of basic client information. Once the client has stabilized and is able to understand the verbal notification, then client information may be entered into HMIS.

Please note that the verbal notification will not be considered valid if read to a client who is unable to comprehend it. **It is up to the case manager to use their informed judgment to decide when a client is capable of understanding the notification or not.**

## D. Data Collection and Funder Requirements

### Refusal to Accept the Verbal Notification of Data Collection

Agencies are required to and have the authority to collect personal information for service provision. Data collected by agency staff is stored securely in the HMIS and is never shared without written client consent. Should a client still refuse to have their information collected after the FOIP notification has been read and discussed, the following processes will apply:

- a) CHF funded agencies:
  - I. Housing First Programs **and** all programs where funding is subject to contractual client target numbers:
    - (1) If the client does not provide data elements (name, demographics, UDEs, and HF assessments), as per Human Services and Homeless Partnering Strategy mandate, they cannot participate in the program.
  - II. Shelter programs:

- (1) Where the client refuses to provide any information, **CHF does not require a client to provide information to stay at a shelter**. Clients are not turned away from a shelter if they refuse to provide their information. Agencies may have other policies or procedures in this regard.

III. Coordinated Access & Assessment program:

- (1) Where the client refuses to provide identifying information, it should be communicated that this may inhibit the ability of participating CAA programs to work collaboratively on behalf of the client. Clients are not turned away from participating in the CAA program and can be entered anonymously.

b) Non-funded agencies:

- I. If the client refuses to have their information collected and stored in the HMIS, it is at the agencies discretion to enter clients who refuse as “anonymous” or under an alias or pseudonym, unless otherwise directed by their funders.

### CHF Funded Family Providers

The CHF recognizes the dynamic nature of families being served in Calgary’s System of Care. In order to capture the complete picture and data set of the services family partner agencies are providing, the following data collection policies apply:

a) All Program Types:

1. Client Record (First and Last name) and Demographics are required to be collected and entered on all members of the family being served by the Program;
2. Universal Data Elements are required to be collected and entered in the Calgary HMIS for all family members 18 years of age or older; and
3. All CHF Funded Family providers are required to complete the Households tab in ServicePoint.

b) Housing First (Rapid Rehousing, Supportive Housing, Permanent Supportive Housing):

1. Assigned Housing First assessments are **required to be entered for the Head of Household only**. Should the question pertain to the entire household, this is noted in the wording of the question and should be answered accordingly; and

2. Should the Housing First Provider have the resources the Housing First assessments can also be completed with any other household members 18 years of age or older.
- c) Emergency Shelter:
1. The Human Services Emergency Shelter assessment is ***required to be completed for the Head of Household only***; and
  2. Should the Emergency Provider have the resources the Emergency Shelter assessment can also be completed with any other household members 18 years of age or older.

### Housing First Programs and Assessment Completion

The CHF recognizes the case management support and work that frontline staff are completing with all active clients. To quantify and qualify the work frontline staff are doing, effective April 1, 2017 all active clients in CHF-funded Housing First providers must complete a Housing First Follow-Up Assessment every 3 months while in program. For technical and reporting purposes ServicePoint will have the functionality to enter Follow-Up Assessments from 3-180 months.

For active clients the following shall apply:

1. Those clients exceeding 60 months in program prior to April 1, 2017 will commence Follow-Up assessments quarterly; assistance with reporting and tracking these follow-up assessments will be provided by CHF HMIS team
2. Those clients exceeding 60 months in program as of April 1, 2017 will proceed with quarterly assessments in keeping with standard process

### Housing First Programs and Client Transfers

Effective April 1, 2015 all clients transferring between CHF-funded Housing First providers must complete the Housing First Exit Interview prior to transfer. Upon transfer to the new Housing First Provider the client will begin Housing First assessments at Intake. The following shall apply:

1. If the client has not moved to new *physical* housing, the move-in date can be reflected as the clients' new Program Entry date;
2. Exiting client from Housing First Program: The Entry/Exit Reason for Leaving is to be answered as Transferred to Housing First Program; and
3. Entering transfer client into Housing First Program: The HF Transfer Indicator is to be answered as "Yes".

## ShelterPoint

Emergency Shelter providers are required to enter all clients served into the appropriate ShelterPoint unit list.

Effective April 1, 2017 ShelterPoint is no longer required to be maintained by CHF Funded Housing First and Prevention programs. Due to ServicePoint functionality Coordinated Access & Assessment referrals will continue to be listed within the ShelterPoint module.

### E. Monitoring

The HMIS Team will work with the HMIS Agency Admin to monitor agencies to ensure that:

1. Agency staff understand the requirement for collection of personal information at their agency;
2. Agency staff understand what verbal notification of data collection means;
3. The verbal notification of data collection is read to and understood by every client;
4. For clients who are intoxicated or who have mental health considerations, only name, demographics and services are collected on clients. Any further data collection will only occur after stabilisation; and
5. Breaches of this policy and of the FOIP Act are prevented.

### Breach of Privacy or Procedure

A breach of these procedures or of the FOIP Act by an agency shall be immediately reported to the CHF in writing by sending a **high priority** email to [HMIS@calgaryhomeless.com](mailto:HMIS@calgaryhomeless.com) and placing ATTN: FOIP BREACH - <Agency or Program Name> in the Subject Line. Please include in the body of email the date and time of breach as well as description of breach (for example unauthorized ServicePoint access, unauthorized disclosure of personal information due to theft of computer etc.).