



*Use of Hardcopy Community Housing  
Assessment Tool Policy  
May 7, 2024*

# Use of Hardcopy Community Housing Assessment Tool

## Purpose

The policy and agreements found on the following pages were developed to provide an opportunity for homeless service agencies to utilize a hardcopy (paper) version of the English language CHAT in circumstances where access to mobile service/Internet is unavailable or its electronic version limits the capacity of the agency to collect this information and prevents efficient data entry into the Coordinated Entry System (CES). The policy also applies to the CHATs in languages other than English, which are only available in hardcopy versions.

## Background

The Community Housing Assessment Tool (CHAT) is utilized by agencies across the State of Nevada to gather information that assists agencies in tailoring services and locating community-wide housing resources available to the homeless person(s) being assessed in the statewide Homeless Management Information System (HMIS).

## Terms used in document

<b>Agency</b>	Any type of organization utilizing HMIS and/or the CHAT in the State of Nevada.
<b>Assessor(s)</b>	Any individual who uses an electronic or hardcopy version of the CHAT to gather client information.
<b>CHAT</b>	Community Housing Assessment Tool (CHAT) is utilized by agencies across the State of Nevada to gather information that assists agencies in tailoring services and locating community-wide housing resources available to the homeless person(s) being assessed. The English language CHAT is available electronically (in HMIS) and hardcopy, while CHATs in languages other than English are available in hardcopy only.
<b>CoC</b>	Per the US Department of Housing and Urban Development, the CoC Program is designed to promote community-wide planning and strategic use of resources to address homelessness; improve coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improve data collection and performance measurement; and allow each community to tailor its programs to the particular strengths and challenges in assisting homeless individuals and families within that community.
<b>CoC Coordinator</b>	Each CoC Lead Agency in the Nevada appoints one CoC Coordinator to oversee each of the three Continuums of Care in the state – Las Vegas/Clark County, Balance of State, and Reno/Sparks/Washoe County.
<b>Hardcopies</b>	Paper forms, files, records, and/or documents. For the purposes of this policy, this refers to paper copies of the CHAT (both in English and non-English versions).
<b>HMIS</b>	The Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Clarity is the brand name of the HMIS used throughout the State of Nevada.

<b>HMIS User</b>	Any person granted access to the State of Nevada's HMIS. HMIS users must have a login in their name. Shared logins are not allowed, and all users must attend annual HMIS training and sign a User Policy and Responsibility Statement.
<b>PHI</b>	Personal Health Information (PHI) includes demographic information, medical histories, mental health conditions, insurance information and other data that is collected to assess client needs and identify appropriate services available to them.
<b>PII</b>	Personally Identifiable Information (PII) is any information that permits the identity of an individual to be directly or indirectly inferred.

## Confidentiality

HMIS provides a secure database platform used for collecting and sharing PII and PHI collected from homeless individuals across the State of Nevada. The HMIS and its related policies are designed to ensure the confidentiality and security of all data collected using the system. The collection, transportation, and storage of hardcopy PII and PHI to be entered in the HMIS is inherently less secure than entering the data directly into the system.

All authorized HMIS users in the State of Nevada are REQUIRED to annually complete a refresher training, acknowledge, and sign the **State of Nevada Community and Homeless Management (CMIS/HMIS) Information System User Policy and Responsibility Statement** or face "disciplinary action in accordance [to their agency's] Policies and Procedures" and/or "immediate termination" from the Nevada CMIS/HMIS system.

Language from the existing HMIS policy that specifically covers "hardcopies" is written in that document as follows:

- Hardcopies of data from the Nevada CMIS/HMIS system must be kept in a secure file (both English non-English versions of documents).
- When hardcopies of data from the Nevada CMIS/HMIS system are no longer needed, they must be destroyed to maintain confidentiality (both English and non-English versions of documents).

## Permitted Use of Hardcopy Community Housing Assessment Tool

The use of a hardcopy version of the CHAT is ONLY permitted for agencies who have access to the State of Nevada Clarity HMIS and meet the following criteria:

- Access to mobile service/Internet is unavailable or unreliable in the location where the assessment is to be conducted, and/or
- Organization-wide technology limitations (too few Internet/mobile-ready laptops, desktops, or tablets) negatively impacts the ability of the agency to effectively meet the demand for assessments.
- The CHAT is administered in a language other than English. The HMIS system does not support the creation of an additional language assessment and as such, CHATs in other languages are only available as hardcopy versions.

If an agency would like to request temporary approval to use the paper CHAT for purposes not listed above, please submit in writing the circumstances and how your agency will work to acquire resources/transition to have enough HMIS licenses for every case worker/staff person inputting CHAT data into HMIS in the future. This should be sent to the CoC Coordinator for the area where the assessment tool is to be used.

## Prior to implementing the use of a hardcopy of a CHAT, Agencies must

- Submit an annual Agency Agreement: Hardcopy Community Housing Assessment Tool (CHAT). This form documents that the agency's leadership acknowledges the importance of securing the data collected using the tool and (re)certifies that they have leadership approved policies and procedures covering the collection, transportation, storage, and destruction of the CHAT.

- All Assessors who utilize a hardcopy CHAT (whether in English or a language other than English), and team members present during its use, must complete an Annual Community Housing Assessment Tool (CHAT) Hardcopy Assessor Agreement.
  - This includes staff who are approved HMIS Users conducting data entry into HMIS using hardcopy information gathered.

## Requirements for using hardcopy CHATs

- The Assessor has previously completed an Assessor Training and Coordinated Entry Assessment Tools Assessor User Agreement for the appropriate CoC (Las Vegas/Clark County, Balance of State, and Reno/Sparks/Washoe County).
- The client is provided with, and indicates acceptance by signature, the Nevada Community Management Information System (CMIS) Client Consent for Data Collection and Release of Information (Appendix C).
- The CHAT is completed with the client(s).
- The hardcopies are stored in a secure (locked) file for transportation and/or until HMIS data entry can occur.
- Data entry into HMIS occurs within 1 business day of collection (including upload of the ROI).
- Hardcopies are immediately shredded after data is entered.

The forms below are available in the Appendices on the following pages.

**Appendix A:** Agency Agreement: Hardcopy Community Housing Assessment Tool (CHAT)

**Appendix B:** Annual Community Housing Assessment Tool (CHAT) Hardcopy Assessor Agreement

**Appendix C:** Nevada Community Management Information System (CMIS) Client Consent for Data Collection and Release of Information (v01.2020)

# Appendix A

## Agency Agreement

### Hardcopy Community Housing Assessment Tool (CHAT)

This form must be fully completed and signed by the requesting agency's Executive Director, Chief Executive Officer, or other official authorized to enter into agreements on behalf of the agency.

Once completed, this form should be submitted for approval to the CoC Coordinator for the Las Vegas/Clark County, Balance of State, and Reno/Sparks/Washoe County CoC where the hardcopy CHAT is to be utilized. If utilized in more than one Nevada CoC region, the form should be submitted separately to each CoC where the hardcopy CHAT is to be utilized. Please keep a copy of this approved form (CoC Coordinator signed) on file in the same secured location where your hardcopy CHAT files are stored.

**Initial next to the statement to indicate acceptance:**

	I acknowledge that the collection, transportation, and storage of hardcopy PII and PHI to be entered in the HMIS is inherently less secure than entering the data directly into the secure system. I will ensure that the individuals working at this agency will follow the guidance outline by the <b>State of Nevada Policy for the Use of Hardcopy Community Housing Assessment Tool</b> and forms contained in it.
	I will ensure that all assessors, additional 'team members' present at the time of assessments, and those who have access to any hardcopy CHAT file(s) in our possession will complete/submit the required <b>Annual Community Housing Assessment Tool (CHAT) Hardcopy Assessor Agreement</b> (Appendix B).
	This agency will secure client approval with the <b>Nevada Community Management Information System (CMIS) Client Consent for Data Collection and Release of Information (ROI)</b> (Appendix C) BEFORE utilizing a hardcopy CHAT with a client.
	I will ensure that anyone administering the CHAT for my agency will complete a Coordinated Entry Training covering the purpose and proper use of the CHAT.
	This agency will ensure data consistency by only using an unaltered (content) hardcopy version of the CHAT identical to the electronic CHAT found in the HMIS for the CoC where the assessment is being completed. This applies to the English language CHAT only. I understand that I may request a copy of the unaltered assessment once this authorization form has been approved.
	I understand that the CHATs in languages other than English only exist as hardcopy versions, and are not in HMIS. The assessment items and numbering match the English version. Once collected on a hardcopy version, I understand that answers for CHATs in languages other than English will be entered into the electronic version of the CHAT in HMIS ensuring answers align with information collected in the hardcopy version.
	I will ensure that this agency has leadership approved Policies and Procedures for the collection of PII and PHI, its storage, physical transportation (if the information is gathered outside of an office), and destruction. These Policies and Procedures will indicate how employee/team member corrective action will occur if not followed.
	I will report (in writing) any potential breaches of security related to the collection, storage, transportation, or destruction of hardcopy CHAT data to my CoC Coordinator as soon as it is discovered.

By signing below, I acknowledge that my agency is responsible for ensuring the confidentiality and security of any PII and PHI collected during the use of a hardcopy CHAT. I understand and accept that failure to secure this information may result in immediate user or agency termination from the Nevada CMIS/HMIS system.

\_\_\_\_\_  
(Print: Name, Title, Organization)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(CoC Coordinator Approval Signature)

\_\_\_\_\_  
(Date)

## Appendix B

# Annual Community Housing Assessment Tool (CHAT)

## Hardcopy Assessor Agreement

This form is to be completed by any individual who will be administering, present during the administration of, or handling a hardcopy version of the Community Housing Assessments (CHATs) in the State of Nevada.

**Once completed, this form is to be signed and submitted annually to your direct supervisor and submitted to the CoC Coordinator for Las Vegas/Clark County, Balance of State, and Reno/Sparks/Washoe County CoC where the hardcopy CHAT is to be utilized. A copy of this supervisor approved form should be kept on file in the same secured location where your agencies hardcopy CHAT files are temporarily stored before data entry (for 1 business day).**

***Initial next to the statement to indicate acceptance:***

	I acknowledge that the collection, transportation, and storage of hardcopy Personally Identifiable Information (PII) and Personal Health information (PHI) to be entered in the HMIS is inherently less secure than entering the data directly into the secure system. I will follow the guidance outlined by the <b>State of Nevada Policy for the Use of Hardcopy Community Housing Assessment Tool</b> and this form.
	I have completed an Assessor Training and Coordinated Entry Assessment Tools Assessor User Agreement for the CoC where the assessment will be utilized.
	I will ensure that everyone from my organization who is present at the time of an assessment that I am conducting, or who has access to the information gathered, has previously completed and submitted this form.
	I will utilize the <b>Nevada Community Management Information System (CMIS) Client Consent for Data Collection and Release of Information (ROI)</b> attached to this document (Appendix C) BEFORE administering a hardcopy CHAT with a client. The CHAT will not be utilized if a signed ROI has not been received at the time of the assessment.
	I will only use an unaltered (content) hardcopy version of the CHAT identical to the electronic CHAT found in the HMIS for the CoC where the assessment is being completed. This applies to the English language CHAT only. I understand that I may request a copy of the unaltered assessment from the CoC Coordinator in the area where I will administer the tool.
	I understand that the CHATs in languages other than English only exist as hardcopy versions, and are not in HMIS. The assessment items and numbering match the English version. Once collected on a hardcopy version, I understand that answers for CHATs in languages other than English will be entered into the electronic version of the CHAT in HMIS ensuring answers align with information collected in the hardcopy version.
	I have received a copy of my agency's leadership approved Policies and Procedures for the collection of PII and PHI, its storage, physical transportation (if the information is gathered outside of an office), and destruction. I understand that corrective action may be taken if I deviate from these Policies and Procedures.
	At no time will I leave a hardcopy CHAT form with PII or PHI unattended, unsecured, or visible to others who have not been authorized. I will only disclose information that I have collected as necessary to perform my job.
	I will report (in writing) any potential breaches of security related to the collection, storage, transportation, or destruction of hardcopy CHAT data to my immediate supervisor as soon as it is discovered.

By signing below, I acknowledge that I am responsible for ensuring the confidentiality and security of any PII and PHI collected during the use of a hardcopy CHAT. I understand and accept that failure to secure this information may result in immediate user or agency termination from the Nevada CMIS/HMIS system.

\_\_\_\_\_  
(Print: Name, Title, Organization)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Agency Supervisor Signature)

\_\_\_\_\_  
(Date)

# Appendix C

## Nevada Community Management Information System (CMIS)

### Client Consent for Data Collection and Release of Information

#### What is the CMIS?

The CMIS is a data system that stores information about homelessness services. Bitfocus, Inc. manages the CMIS for the CoCs within the state of Nevada. The purpose of the CMIS is to improve services that support people who are homeless or at risk of homelessness to get housing, and to have better access to those services, while meeting requirements of funders such as the U.S. Department of Housing and Urban Development (HUD).

#### What is the purpose of this form?

With this form, you can give permission to have information about you collected and shared with Partner Agencies that help Nevada provide housing and services. A current list of Partner Agencies is available at <http://nvcmis.bitfocus.com/>.

**BY SIGNING THIS FORM, I AUTHORIZE the state of Nevada and Bitfocus to share CMIS information with Partner Agencies. The CMIS information shared will be used to help me get housing and services. It will also be used to help evaluate the quality of housing and service programs. I understand that the Partner Agencies may change over time.**

The information to be collected and shared includes:

- Name, date of birth, gender, race, ethnicity, social security number, phone number, address
- Basic medical, mental health, substance use, and daily living information
- Housing Information
- Use of crisis services, veteran services, hospitals and jail
- Employment, income, insurance and benefits information
- Services provided by Partner Agencies
- Results from assessments
- My photograph or other likeness (if included)

#### BY SIGNING THIS FORM, I UNDERSTAND THAT:

- Bitfocus and Partner Agencies will keep my CMIS information private using strict privacy policies. I have the right to review their privacy policies.
- I can receive a copy of this Consent and the Client Information Sheet
- I may refuse to sign this Consent. If I refuse, I will not lose any benefits or services.
- This Consent will expire 5 years from my last CMIS recorded activity.

I may revoke this Consent earlier at any time by returning a completed Revocation of Consent form, available at <http://nvcmis.bitfocus.com/>, to [nevada@bitfocus.com](mailto:nevada@bitfocus.com).

- The revocation will take effect upon receipt, except to the extent others have already acted under this Consent.
- My CMIS information may be viewed by auditors or funders who review work of the Partner Agencies, including HUD, The Department of Veteran Affairs, and The Department of Health and Human Services. I understand that the list of auditors and funders may change over time.
- My CMIS information may be shared to coordinate referral and placement for housing and services.
- My CMIS information may be further shared by the Partner Agencies to other agencies for care coordination, counseling, food, utility assistance, and other services.
- My CMIS information will be used to help evaluate the quality of social services.
- My CMIS information may be used for research; however, my identity will remain private.

#### SIGNATURE:

\_\_\_\_\_  
Signature of Patient/Client or Representative

\_\_\_\_\_  
Date

\_\_\_\_\_  
PRINTED NAME

## Refusing Consent and De-Identification of Information

If you refuse consent to have your information shared with Partner Agencies, the following information will be entered into the system for your profile and will be deemed as anonymous or “de-identified”.

1. Your Social Security Number will be entered as all 0s and the Social Security Number Data Quality field will be set to Client Refused;
2. Your Date of Birth will be entered as 01/01/[year of birth] and the Date of Birth Data Quality field will be set to Approximate or Partial DOB Reported;
3. Your First Name will be entered as Anonymous;
4. Your Last Name will be entered as the Unique Identifier automatically assigned by Clarity Human Services; and
5. The Name Data Quality field will be set to Client Refused.

### FOR AGENCY USE ONLY:

Client Opted Out (Refused Consent) \_\_\_\_\_ *(Staff/Agency Initials)*

\_\_\_\_\_  
Witness Staff & Agency

\_\_\_\_\_  
Date