2017 Program Review and Certification Standards
M. Data Collection and Columbus ServicePoint

New requirements are in red text and do not apply for the 2017 PR&C review. These requirements will be applicable in 2018.
Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2017 PR&C review.
Blue text describes how the revised 2017 standards correlate with the 2016 standards.

Removed 10 standards

Standard M1	Guideline M1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency does not share CSP data with any agency that has not entered into a CSP agreement with CSB.	☐ The agency has a written policy that precludes unauthorized data sharing. The policy is available for review. ☐ Specific funder requests must be addressed with CSB. A written request specifying what data is to be shared must be submitted to CSB for approval.	☐ Policy Review: CSB reviewed agency policy. ☐ Discussion: CSB discussed compliance with agency staff.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs
Discussion and Basis for Conclusion						

Standard M2	Guideline M2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency collects, enters, and extracts only CSP data that is	☐ The agency has a written policy regarding data collection, entry, and extraction that specifies	☐ Policy Review: CSB reviewed agency policy.	☐ Compliant ☐ Compliant		1	All programs

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relevant to the delivery of homeless services. Formerly Standard M2(a).	appropriate use of data. The policy is available for review. ☐ The agency maintains the confidentiality of records pertaining to any client who received family violence prevention or treatment services. ☐ The agency maintains the confidentiality of the address or location of any family violence project.	☐ Discussion: CSB discussed compliance with agency staff.	with conditions ☐ Non-compliant ☐ N/A			
Discussion and Basis for Conclusion						

Standard M3	Guideline M3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency collects CSP data by lawful and fair means and, where appropriate, with the knowledge or consent of the individual. Formerly Standard	☐ The agency has a written policy requiring this data to be collected in accordance with applicable law. ☐ Consent of the individual for data collection may be inferred from the circumstances of the collection.	☐ File Review: CSB reviewed client files for Client Acknowledgement Form.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant		1	All programs

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M2(b).	☐ The Client Acknowledgement Form is available for review and staff is knowledgeable about the policy.		☐ N/A			
Discussion and Basis for Conclusion						

Standard M4	Guideline M4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency posts a sign at each intake desk (or comparable location) that explains the reasons for collecting information. Formerly Standard M2(c).	☐ The sign contains the following language: "We collect personal information directly from you for reasons that are discussed in our privacy policy. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless individuals, and to better understand the needs of homeless individuals. We only collect information that we	☐ Other: CSB reviewed signage.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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	consider to be appropriate. If you would like to see our privacy policy, our staff will provide you with a copy."					
Discussion and Basis for Conclusion						

Standard M5	Guideline M5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Protected Personal Information (PPI) and other CSP data elements collected by an agency are relevant to the purpose for which it is used, accurate, and complete. Data is entered in real time to the fullest extent possible. An authorized CSP user is on-site during hours of potential intake. Formerly Standards M3(a), M3(b), and C9.	☐ Accuracy is defined as at least 95% of PPI and other CSP data elements entered into CSP matches data in client files, in accordance with CSP Client Tracking and Quality Assurance Standards. ☐ Information in client files matches CSP data. ☐ If intake data is captured by CPoA, a copy of the CSP printout can serve as verification for PPI, provided that the client reviewed and signed the printout to confirm its accuracy.	☐ File Review: CSB reviewed client files. ☐ Policy Review: CSB reviewed agency quality assurance plan. ☐ Other: CSB reviewed staffing patterns.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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	☐ All efforts are made to ensure real-time data entry. A CSP user is on-site during hours of potential intake, including weekend and overnight shifts, if applicable.				
	☐ The agency has a written quality assurance plan and verifies by the 4th working day of each month that all required CSP data elements were entered completely and accurately. The quality assurance plan is available for review.				
	☐ The income of each tenant must be recorded and verified at the time of admission into housing.				
	☐ Income for each tenant must be verified at least annually, including obtaining proper income documentation for the client file. Annual updates must occur within 30 days of the anniversary of the client's entry into the program. CSP data confirms compliance with the 30-day timeframe.				
Discussion and Basis for Conclusion					

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Standard M6	Guideline M6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency accurately enters all required CSP data elements for each client sheltered by 9am the following day, as specified in the Partnership Agreement. Formerly Standard M3(c).	☐ The agency has a written quality assurance plan in place and verifies by 9am each day that all required CSP elements were entered accurately for the preceding day. This quality assurance plan is available for review. ☐ Manual Bedlist information matches CSP bedlist information.	☐ File Review: CSB reviewed client files. ☐ File Review: CSB reviewed bedlists.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	Shelters

Discussion and Basis for Conclusion

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Standard M7	Guideline M7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Service records added to the CSP database have entry and exit dates that accurately reflect the paper files or intake packets. Formerly Standard M3(e).	☐ The agency has a written quality assurance plan in place and a process for verifying that entry and exit dates in the files match the CSP data. ☐ The agency can produce actual files that contain information that matches the data entered into the CSP database.	☐ File Review: CSB reviewed client files.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

Discussion and Basis for Conclusion

Standard M8	Guideline M8	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency publishes and specifies in the privacy policy the purposes for which it collects PPI and describes all uses and disclosures of PPI.	☐ The policy is available for review. ☐ The privacy policy requires staff to inform clients of the purpose for data collection and all client rights concerning the collection and	☐ Policy Review: CSB reviewed the privacy policy and any amendments to the privacy policy. ☐ Discussion: CSB discussed compliance	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant		1	All programs

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The agency provides a copy of the policy to any individual upon request. Formerly Standards M4(a), M5(a), M5(b), M5(c), and M5(d).	use of their private information. ☐ The agency states in the privacy policy that the policy may be amended at any time and those amendments may affect information obtained by the agency before the date of the change. The agency maintains permanent documentation of all privacy policy amendments. ☐ The agency may infer consent for all uses and disclosures specified in the policy and for uses and disclosures determined by the agency to be compatible with those specified in the policy. ☐ The agency posts a sign stating the availability of its privacy policy to anyone who requests a copy. If the agency maintains a public web page, the current version of the policy is posted.	with agency staff. ☐ Other: CSB confirmed signage. ☐ Other: CSB reviewed the agency website.	☐ N/A			
Discussion and Basis for Conclusion						

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Standard M9	Guideline M9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
With certain exceptions, the agency only uses or discloses PPI if that use or disclosure is allowed by these standards and is described in the agency's privacy policy. Formerly Standard M4(b).	☐ The agency has a written policy indicating that the agency only uses and discloses information not covered in the privacy policy with the consent of the individual or when required by law.	☐ Policy Review: CSB reviewed the policy. ☐ Discussion: CSB discussed compliance with agency staff.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs
Discussion and Basis for Conclusion						

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Standard M10	Guideline M10	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
With certain exceptions, the agency allows any individual to have a copy of his or her PPI. The agency considers any request by an individual for correction of inaccurate or incomplete PPI pertaining to the individual. Formerly Standards M6(a), M6(b), and M6(c).	☐ In the privacy policy, the agency may reserve the ability to rely on the following reasons for denying an individual inspection or copying of the individual's PPI: (1) information compiled in reasonable anticipation of litigation or comparable proceedings; (2) information about another individual (other than a health care or homeless provider); (3) information obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) if disclosure would reveal the source of the information; (4) information the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual; or (5) inability to establish individual's identity. ☐ The agency is not required to remove any information, but instead may mark	☐ Policy Review: CSB reviewed the privacy policy. ☐ Discussion: CSB reviewed agency examples of correcting PPI, or discussed the procedures with agency staff.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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	information as inaccurate or incomplete and may supplement it with additional information. ☐ The agency can provide a policy for CSB review and staff can describe the procedure for requests for corrections. The agency may reject repeated or harassing requests for access or correction. ☐ If the agency denies an individual's request for access or correction, the agency explains the reason for the denial to the individual and includes documentation of the request and the reason for the denial as part of such individual's PPI.				

Discussion and Basis for Conclusion

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Standard M11	Guideline M11	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a procedure for accepting and considering questions or complaints about its privacy policy and security practices. Formerly Standard M7(a).	☐ Staff can describe the procedure and if forms are used, they are available for review.	☐ Discussion: CSB discussed with agency staff.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

Discussion and Basis for Conclusion

Standard M12	Guideline M12	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency requires each member of its staff (including employees, volunteers, affiliates, contractors, and associates) to sign a confidentiality agreement acknowledging receipt of a copy of the privacy	☐ The signed confidentiality agreements are available for review.	☐ File Review: CSB reviewed signed confidentiality agreements.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant		1	All programs

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policy and pledging to comply with the privacy policy. Formerly Standard M7(b).			☐ N/A			
Discussion and Basis for Conclusion						

Standard M13	Guideline M13	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has completed a CSP User Agreement for each authorized system user and has provided a copy to CSB. Formerly Standard M7(c).	☐ CSP User Agreements are up-to-date and on file at the agency for each user. ☐ CSP User Agreements match the CSB user list and are available for review.	☐ File Review: CSB reviewed the User Agreements.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs
Discussion and Basis for Conclusion						

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Standard M14	Guideline M14	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency does not store or display written information specifically pertaining to user access (e.g., user name, password) in any publicly accessible location. When workstations used to collect and store CSP data are not in use and staff is not present, steps are taken to ensure that the computers and data are secure and not accessible or usable by unauthorized individuals. Formerly Standards M8(c) and M8(g).	☐ Usernames and passwords are not displayed in any visible and accessible location. ☐ If an agency staff temporarily leaves their workstation, he/she uses the screen lock function to prevent unauthorized access from other individuals. ☐ After a short amount of time of non-use, workstations automatically turn on a password-protected screen saver. ☐ If staff from the agency will be gone for an extended period of time, they are required to log off the data entry system. ☐ Staff can describe and/or demonstrate the procedure.	☐ Discussion: CSB discussed procedures with agency staff. ☐ Other: CSB inspected work areas.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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Discussion and Basis for Conclusion

Standard M15	Guideline M15	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
CSP users must not be able to log on to CSP from more than one workstation at a time, or be able to access client level data from more than one location at a time if client level data is stored locally on the network. The agency secures all electronic CSP data with a user authentication system consisting of a user name and a password. Formerly Standards	☐ IT specialist can confirm compliance and compliance can be demonstrated.	☐ Other: CSB visually confirmed compliance. ☐ Other: CSB reviewed written confirmation from IT specialist.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

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M8(d) and M9(b).						

Discussion and Basis for Conclusion

Standard M16	Guideline M16	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency supervises any paper or other hard copy containing PPI that is generated by or for CSP. When supervision is not possible, the hard copy PPI will be secured. Formerly Standard M10(a).	☐ When the agency staff is unable to supervise any paper or hard copy document because they are not present, the information is secured in an area that is not publicly accessible.	☐ <u>Other</u>: CSB ensured that hard copies of PPI are secure when agency staff is not present.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		1	All programs

Discussion and Basis for Conclusion

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Standard M17	Guideline M17	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a written plan to dispose of or remove identifiers from PPI stored on agency computers and data storage devices 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). Formerly Standard M3(d).	☐ To dispose of or remove identifiers or other CSP data from data storage medium, the agency reformats the storage medium more than once before reusing or disposing of the medium. ☐ A written policy is available for review.	☐ Policy Review: CSB reviewed the written policy.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		2	All programs
Discussion and Basis for Conclusion						

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Standard M18	Guideline M18	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency provides reasonable accommodations for persons with disabilities throughout the data collection process. Formerly Standard M5(e).	☐ Reasonable accommodations include, but are not limited to, providing qualified sign language interpreters or readers or providing materials in accessible formats such as Braille, audio or large type, as needed by the individual with a disability. ☐ Agencies that are recipients of federal financial assistance will provide required information in languages other than English that are common in the community if speakers of these languages are found in significant numbers and come into frequent contact with the agency. ☐ The agency can provide a policy for CSB review.	☐ Policy Review: CSB reviewed the policy. ☐ Discussion: CSB discussed compliance with agency staff.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		2	All programs
Discussion and Basis for Conclusion						

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Standard M19	Guideline M19	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency uses appropriate methods to monitor security systems. Formerly Standard M8(k).	☐ The agency limits access to information provided by CSP to its own employees specifically for verifying eligibility for service, entering data for services provided, tracking client services, monitoring data quality, and evaluating programs. ☐ The agency has a written policy regarding access to the CSP database that is available for review. The policy prohibits employees from using CSP data in an unethical or unprofessional manner.	☐ Policy Review: CSB reviewed the policy.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		2	All programs

Discussion and Basis for Conclusion

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Standard M20	Guideline M20	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency encrypts all CSP data that is electronically transmitted over the Internet, publicly accessible networks, or phone lines to current industry standards. Formerly Standard M9(c).	☐ The current industry standard is 128-bit encryption. ☐ Unencrypted data may be transmitted over secure direct connections between two systems. A secure direct connection is one that can only be accessed by users who have been authenticated on at least one of the systems involved and does not utilize any tertiary systems to transmit the data. A secure network would have secure direct connections. ☐ Encryption and data transmission policy is available for review. ☐ Staff can describe compliance.	☐ Discussion: CSB discussed with agency staff how the agency secures electronically transmitted data.	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		2	All programs
Discussion and Basis for Conclusion						

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Standard M21	Guideline M21	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency applies system security provisions to all the systems where PPI is stored, including but not limited to, the agency's networks, desktops, laptops, mini-computers, mainframes, and servers. Formerly Standard M8(a).	☐ The agency's IT specialist can confirm that these system security provisions are in place.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M22	Guideline M22	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency secures CSP and stored CSP data with a user authentication system consisting of a user name and a password. Formerly Standard M8(b).	☐ Written policy is available for review. ☐ IT specialist can confirm compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

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Standard M23	Guideline M23	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency protects CSP from malicious intrusions behind a secure firewall. Formerly Standard M8(e).	☐ Each individual station has its own firewall or there is a firewall between each workstation and any system, including the Internet and other computer networks located outside of the agency. ☐ The agency has a policy for review. ☐ IT specialist can confirm compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M24	Guideline M24	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
If an agency uses public forums for data collection or reporting, CSP must be secured to allow only connections from previously approved computers and systems through Public Key Infrastructure (PKI) certificates, extranets that limit access based on the Internet	☐ The agency can provide a policy for review outlining how the agency maintains compliance with the standard. ☐ IT specialist can confirm compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

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Provider (IP) address, or similar means. Formerly Standard M8(f).						

Standard M25	Guideline M25	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
If the agency copies CSP data on a regular basis to another medium (e.g., tape) it stores the medium in a secure off-site location where the required privacy and security standards also apply. Formerly Standard M8(h).	☐ Agency backup information is securely stored. ☐ IT specialist can confirm compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M26	Guideline M26	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
If the agency stores data in a central server, mini-computer, or mainframe, it stores the central server, mini-computer, or mainframe in a secure room with appropriate	☐ IT specialist can demonstrate compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant		3	All programs

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temperature control and fire suppression systems. Formerly Standard M8(i).			☐ N/A			

Standard M27	Guideline M27	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Surge suppressors must be used to protect systems used for collecting and storing all of the CSP data. Formerly Standard M8(j).	☐ IT specialist can confirm compliance.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M28	Guideline M28	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Agencies that have systems that have access to any CSP data maintain a user access log and logs are checked regularly. Formerly Standard M8(l).	☐ The CSP system provides automatic compliance with this standard.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant		3	All programs

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			☐ N/A			

Standard M29	Guideline M29	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency applies application security provisions to the software during data entry, storage, review and any other processing function. Formerly Standard M9(a).	☐ The CSP system provides automatic compliance with this standard.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

Standard M30	Guideline M30	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency stores all CSP data in a binary format. Formerly Standard M9(d).	☐ If the agency uses one of several common applications (e.g., Microsoft Access, Microsoft SQL Server, and Oracle), it is already storing data in binary format, and no other steps are necessary.	Self-certification	☐ Compliant ☐ Compliant with conditions ☐ Non-compliant ☐ N/A		3	All programs

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* CSB staff signature for Tier 1 (annually) and Tier 2 (every 4 years)
* Agency staff signature for Tier 2 (when not reviewed by CSB) and Tier 3 (annually)

CSB reviews Tier 2 standards every 4 years. For years when CSB does not review Tier 2 standards, agency staff certifies compliance with both Tier 2 and Tier 3 standards in the 'Certifying Official' column.

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