

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

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.	<input type="checkbox"/> The agency has a policy that precludes unauthorized data sharing. The policy is available for review.  <input type="checkbox"/> 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.	<input type="checkbox"/> CSB reviewed agency policy and discussed compliance with staff.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b>						

Standard M2(a)	Guideline M2(a)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency collects, enters and extracts only CSP data that is relevant to the delivery of homeless services.	<input type="checkbox"/> The agency has a policy regarding data collection, entry and extraction that specifies appropriate use of data. The policy is available for review.  <input type="checkbox"/> The agency maintains the confidentiality of records pertaining to any client who received family violence	<input type="checkbox"/> CSB reviewed agency policy and discussed compliance with staff.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant		1	All programs

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

	prevention or treatment services.  <input type="checkbox"/> The agency maintains the confidentiality of the address or location of any family violence project.		<input type="checkbox"/> N/A			
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**Discussion and Basis for Conclusion**

Standard M2(b)	Guideline M2(b)	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.	<input type="checkbox"/> The agency has a policy requiring this data to be collected in accordance with applicable law.  <input type="checkbox"/> Consent of the individual for data collection may be inferred from the circumstances of the collection.  <input type="checkbox"/> The Client Acknowledgement form is available for review and staff is knowledgeable about the policy.	<input type="checkbox"/> CSB reviewed client files for Client Acknowledgement form.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs

**Discussion and Basis for Conclusion**

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M2(c)	Guideline M2(c)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency posts a sign at each intake desk (or comparable location) that generally explains the reasons for collecting information.</p>	<p><input type="checkbox"/> 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 consider to be appropriate. If you would like to see our privacy policy, our staff will provide you with a copy."</p>	<p><input type="checkbox"/> CSB located and reviewed sign(s).</p>	<p><input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A</p>		1	All programs
<p><b>Discussion and Basis for Conclusion</b></p>						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M3(a)	Guideline M3(a)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Protected Personal Information (PPI) collected by an agency is relevant (to the purpose for which it is used), accurate, and complete. Data is entered in real time to the fullest extent possible.	<input type="checkbox"/> In accordance with CSP Client Tracking and QA Standards, accuracy is defined as at least 95% of PPI entered into CSP data matches data from client files upon inspection.  <input type="checkbox"/> If intake data is captured by CPoA, a copy of the CSP printout can serve as verification for PPI, provided that the client has reviewed and signed the printout to confirm its accuracy.  <input type="checkbox"/> The agency ensures that all possible efforts are made to ensure real-time data entry, including compliant staffing patterns.	<input type="checkbox"/> CSB reviewed client files.  <input type="checkbox"/> CSB reviewed staffing patterns.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b>						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M3(b)	Guideline M3(b)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency accurately enters all required CSP data elements collected in the preceding month by the fourth working day of each month, as specified in the Partnership Agreement.	<input type="checkbox"/> The agency has a quality assurance plan in place and verifies by the fourth working day of each month that all required CSP data elements were entered completely and accurately. This quality assurance plan is available for review.  <input type="checkbox"/> Information in client files matches CSP data.	<input type="checkbox"/> CSB reviewed client files and quality assurance plan.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs

**Discussion and Basis for Conclusion**

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Standard M3(c)	Guideline M3(c)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency accurately enters all required ShelterPoint data elements for each client sheltered by 9am the following day, as specified in the Partnership Agreement.	<input type="checkbox"/> The agency has a quality assurance plan in place and verifies by 9am each day that all required ShelterPoint elements were entered accurately for the preceding day. This quality assurance plan is available for review.	<input type="checkbox"/> CSB reviewed client files and bedlists.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	Shelters

Agency:

Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

	<input type="checkbox"/> Manual Bedlist information matches CSP bedlist information.				
<b>Discussion and Basis for Conclusion</b>          					

Standard M3(d)	Guideline M3(d)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a 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), including reformatting the storage medium more than once before reusing or disposing of the medium.	<input type="checkbox"/> In order 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.  <input type="checkbox"/> The agency can provide a policy to CSB for review.	<input type="checkbox"/> CSB reviewed the policy.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Discussion and Basis for Conclusion

Standard M3(e)	Guideline M3(e)	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.	<input type="checkbox"/> The agency has a quality assurance plan in place and a process for verifying that entry and exit dates in the files match the CSP data.  <input type="checkbox"/> The agency can produce actual files that contain information that matches the data entered into the CSP database.	<input type="checkbox"/> CSB reviewed client files.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs

Discussion and Basis for Conclusion

Standard M4(a)	Guideline M4(a)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency specifies in the privacy policy the purposes for which it collects PPI	<input type="checkbox"/> The agency may infer consent for all uses and disclosures specified in the policy and for uses and disclosures	<input type="checkbox"/> CSB reviewed the policy and discussed compliance with	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with		1	All programs

Agency:

Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

and describes all of the uses and disclosures of such PPI.	determined by the agency to be compatible with those specified in the policy.  <input type="checkbox"/> Privacy Policy is available for review.	staff.	conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A			
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**Discussion and Basis for Conclusion**

Standard M4(b)	Guideline M4(b)	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.	<input type="checkbox"/> The agency can provide a policy for review that indicates 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.	<input type="checkbox"/> CSB reviewed the policy and discussed compliance with staff.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

**Discussion and Basis for Conclusion**

Agency:  
Date of Review:



**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M5(a)	Guideline M5(a)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency publishes a privacy policy describing its policies and practices for the processing of PPI and provides a copy of such policy to any individual upon request.	<input type="checkbox"/> The agency posts a sign stating the availability of its privacy policy to any individual who requests a copy.  <input type="checkbox"/> The policy is available for review	<input type="checkbox"/> CSB reviewed the policy and confirm signage.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b>						

Standard M5(b)	Guideline M5(b)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency's privacy policy requires staff to inform clients of the purpose for data collection and explain all client rights concerning the collection and use of their private information.	<input type="checkbox"/> Intake staff can explain how they inform clients of these rights.	<input type="checkbox"/> CSB reviewed the policy and discussed compliance with staff.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant		1	All programs

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

			<input type="checkbox"/> N/A		
<b>Discussion and Basis for Conclusion</b>					

<b>Standard M5(c)</b>	<b>Guideline M5(c)</b>	<b>Monitoring Method</b>	<b>Conclusion</b>	<b>Certifying Official*</b>	<b>Tier</b>	<b>Program Type</b>
If the agency maintains a public web page, the agency posts the current version of its privacy policy on the web page.	<input type="checkbox"/> Website is available for review.	<input type="checkbox"/> CSB reviewed agency website.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

<b>Discussion and Basis for Conclusion</b>						
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Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M5(d)	Guideline M5(d)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency states in the privacy policy that the policy may be amended at any time, and that amendments may affect information obtained by the agency before the date of the change. All amendments to the privacy policy must be consistent with the requirements of these standards.	<input type="checkbox"/> The agency maintains permanent documentation of all privacy policy amendments.	<input type="checkbox"/> CSB reviewed amendments to privacy policy, if applicable.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

**Discussion and Basis for Conclusion**

Standard M5(e)	Guideline M5(e)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency provides reasonable accommodations for persons with disabilities throughout the data collection process.	<input type="checkbox"/> Reasonable accommodations include, but are not limited to, providing qualified sign language interpreters or readers or providing materials in accessible	<input type="checkbox"/> CSB reviewed the policy and discussed compliance with staff.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-		1	All programs

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

	<p>formats such as Braille, audio or large type, as needed by the individual with a disability.</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> The agency can provide a policy for CSB review.</p>		<p>compliant</p> <p><input type="checkbox"/> N/A</p>			
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**Discussion and Basis for Conclusion**

Standard M6(a)	Guideline M6(a)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
With certain exceptions, the agency allows any individual to have a	<input type="checkbox"/> In its privacy policy, the agency may reserve the ability to rely on the following reasons for denying an	<input type="checkbox"/> CSB reviewed the privacy policy. May be reviewed with standard M5(a).	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with		1	All programs

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

copy of his or her PPI.	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.		conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A			
<b>Discussion and Basis for Conclusion</b>						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M6(b)	Guideline M6(b)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency considers any request by an individual for correction of inaccurate or incomplete PPI pertaining to the individual.	<input type="checkbox"/> The agency is not required to remove any information, but instead may mark information as inaccurate or incomplete and may supplement it with additional information.  <input type="checkbox"/> The agency can provide a policy for CSB review.  <input type="checkbox"/> Staff can describe the procedure.	<input type="checkbox"/> CSB reviewed agency examples of correcting PPI, or discussed the procedures with agency staff.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs

**Discussion and Basis for Conclusion**

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Standard M6(c)	Guideline M6(c)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
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	<input type="checkbox"/> The agency may reject repeated or harassing requests for access or correction.	<input type="checkbox"/> CSB discussed with agency staff and reviewed in conjunction with M6(b).	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant		1	All programs

Agency:

Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

request and the reason for the denial as part of such individual's PPI.			<input type="checkbox"/> N/A			
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**Discussion and Basis for Conclusion**

Standard M7(a)	Guideline M7(a)	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.	<input type="checkbox"/> Staff can describe the procedure and if forms are used, they are available for review.	<input type="checkbox"/> CSB discussed with agency staff.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

**Discussion and Basis for Conclusion**

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M7(b)	Guideline M7(b)	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 (annually or otherwise) a confidentiality agreement acknowledging receipt of a copy of the privacy policy and pledging to comply with the privacy policy.	<input type="checkbox"/> The signed confidentiality agreements are available for review.	<input type="checkbox"/> CSB reviewed signed confidentiality agreements.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

**Discussion and Basis for Conclusion**

Standard M7(c)	Guideline M7(c)	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.	<input type="checkbox"/> CSP User Agreements are up-to-date and on file at the agency for each user. <input type="checkbox"/> CSP User Agreements match the CSB user list and are available for review.	<input type="checkbox"/> CSB reviewed the User Agreements.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant		1	All programs

Agency:  
Date of Review:



**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

			<input type="checkbox"/> N/A			
<b>Discussion and Basis for Conclusion</b>						

Standard M7(d)	Guideline M7(d)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Technical assistance requests and training issues should be limited to one point of contact with the CSB Systems Administrator, typically the Site Administrator.	<input type="checkbox"/> The Site Administrator can describe how technical assistance requests are handled internally and how technical assistance and training needs are communicated to CSB.	<input type="checkbox"/> CSB discussed with Site Administrator.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b>						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M8(a)	Guideline M	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.	<input type="checkbox"/> The agency's IT specialist can confirm that these system security provisions are in place.	<input type="checkbox"/> CSB reviewed written confirmation from IT specialist.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b>						

Standard M8(b)	Guideline M8(b)	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.	<input type="checkbox"/> Written policy is available for review. <input type="checkbox"/> IT specialist can confirm compliance.	<input type="checkbox"/> CSB reviewed written confirmation from IT specialist.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant		1	All programs

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

			<input type="checkbox"/> N/A			
<b>Discussion and Basis for Conclusion</b>						

<b>Standard M8(c)</b>	<b>Guideline M8(c)</b>	<b>Monitoring Method</b>	<b>Conclusion</b>	<b>Certifying Official*</b>	<b>Tier</b>	<b>Program Type</b>
The agency does not store or display written information specifically pertaining to user access (e.g., user name and password) in any publicly accessible location.	<input type="checkbox"/> Usernames and passwords are not displayed in any visible and accessible location.	<input type="checkbox"/> CSB inspected work areas for passwords / usernames.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

<b>Discussion and Basis for Conclusion</b>						
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Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M8(d)	Guideline M8(d)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Individual 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 (PPI) from more than one location at a time if client level data is stored locally on the network.	<input type="checkbox"/> IT specialist can confirm compliance. <input type="checkbox"/> Compliance can be demonstrated.	<input type="checkbox"/> CSB visually confirmed compliance and reviewed written confirmation from IT specialist.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b>						

Standard M8(e)	Guideline M8(e)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency protects CSP from malicious intrusions behind a secure firewall.	<input type="checkbox"/> 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. <input type="checkbox"/> The agency can provide a	<input type="checkbox"/> CSB reviewed policy and written confirmation from IT specialist.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

	<p>policy for CSB review.</p> <p><input type="checkbox"/> IT specialist can confirm compliance.</p>					
<b>Discussion and Basis for Conclusion</b>						

<b>Standard M8(f)</b>	<b>Guideline M8(f)</b>	<b>Monitoring Method</b>	<b>Conclusion</b>	<b>Certifying Official*</b>	<b>Tier</b>	<b>Program Type</b>
If an agency uses public forums for data collection or reporting, the 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 Provider (IP) address, or similar means.	<p><input type="checkbox"/> The agency can provide a policy for CSB review outlining how the agency maintains compliance with the standard.</p> <p><input type="checkbox"/> IT specialist can confirm compliance.</p>	<input type="checkbox"/> CSB reviewed policy and written confirmation from IT specialist.	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		1	All programs
<b>Discussion and Basis for Conclusion</b>						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M8(g)	Guideline M8(g)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>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.</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> If an agency staff temporarily leaves their workstation, he/she uses the screen lock function to prevent unauthorized access from other individuals.</li> <li><input type="checkbox"/> After a short amount of time of non-use, workstations automatically turn on a password-protected screen saver.</li> <li><input type="checkbox"/> If staff from the agency will be gone for an extended period of time, they are required to log off the data entry system.</li> <li><input type="checkbox"/> Staff can describe and/or demonstrate the procedure.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> CSB inspected work areas and noted any security concerns. CSB discussed in conjunction with standard M8(c).</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		1	All programs
<p><b>Discussion and Basis for Conclusion</b></p>						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M8(h)	Guideline M8(h)	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 data in a secure off-site location where the required privacy and security standards also apply.	<input type="checkbox"/> Agency backup information is securely stored.  <input type="checkbox"/> IT specialist can confirm compliance and compliance can be demonstrated.	<input type="checkbox"/> CSB reviewed written confirmation from IT specialist and visually confirmed compliance, if possible.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b>						

Standard M8(i)	Guideline M8(i)	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 temperature control and fire suppression	<input type="checkbox"/> IT specialist can demonstrate compliance.	<input type="checkbox"/> CSB reviewed written confirmation from IT specialist.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant		1	All programs

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

systems.			<input type="checkbox"/> N/A		
<b>Discussion and Basis for Conclusion</b>					

<b>Standard M8(j)</b>	<b>Guideline M8(j)</b>	<b>Monitoring Method</b>	<b>Conclusion</b>	<b>Certifying Official*</b>	<b>Tier</b>	<b>Program Type</b>
Surge suppressors must be used to protect systems used for collecting and storing all of the CSP data.	<input type="checkbox"/> The agency can provide a policy for CSB review outlining how the agency maintains compliance with the standard.  <input type="checkbox"/> IT specialist can confirm compliance.	<input type="checkbox"/> CSB reviewed policy and written confirmation from IT specialist.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs

<b>Discussion and Basis for Conclusion</b>						
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Agency:  
Date of Review:



**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M8(k)	Guideline M8(k)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency uses appropriate methods to monitor security systems.</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The agency limits access to information provided by the CSP database to its own employees specifically for verifying eligibility for service, entering data for services provided, tracking client services, monitoring data quality and evaluating programs.</li> <li><input type="checkbox"/> The agency has a 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.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> CSB reviewed the policy.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		1	All programs
<p><b>Discussion and Basis for Conclusion</b></p>						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M8(l)	Guideline M8(l)	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.	<input type="checkbox"/> The CSP system provides automatic compliance with this standard.	<input type="checkbox"/> All agencies are automatically compliant.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b> N/A						

Standard M9(a)	Guideline M9(a)	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.	<input type="checkbox"/> The CSP system provides automatic compliance with this standard.	<input type="checkbox"/> All agencies are automatically compliant.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b> N/A						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M9(b)	Guideline M9(b)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency secures all electronic CSP data with a user authentication system consisting of a user name and a password.	<input type="checkbox"/> The same user name and password requirements provided in Guideline 8(b) are also applicable to securing electronic CSP data.	<input type="checkbox"/> CSB conducted a visual confirmation in conjunction with Standard M8(b).	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b>          						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M9(c)	Guideline M9(c)	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency encrypts all CSP data that is electronically transmitted over the Internet, publicly accessible networks, or phone lines to current industry standards.</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The current industry standard is 128-bit encryption.</li> <li><input type="checkbox"/> 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.</li> <li><input type="checkbox"/> Encryption and data transmission policy is available for review.</li> <li><input type="checkbox"/> Staff can describe compliance with this standard.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> CSB reviewed the policy and discussed with agency staff how the agency secures electronically transmitted data.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		1	All programs
<p><b>Discussion and Basis for Conclusion</b></p>						

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

Standard M9(d)	Guideline M	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency stores all CSP data in a binary format.	<input type="checkbox"/> 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.	<input type="checkbox"/> CSB discussed with agency staff.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs
<b>Discussion and Basis for Conclusion</b>						

Standard M10(a)	Guideline M10(a)	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	<input type="checkbox"/> 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	<input type="checkbox"/> CSB ensured that hard copies of PPI are secure when agency staff is not present.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions		1	All programs

Agency:  
Date of Review:

**Program Review and Certification Standards  
M. Data Collection and Columbus Service Point**

supervision is not possible, the same will be secured.	not publicly accessible.		<input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A			
<b>Discussion and Basis for Conclusion</b>						

- \* CSB staff initials for Tier 1 and Tier 2
- \* Agency staff signature for Tier 3 and Voluntary

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CSB certifying official signature

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Date

\_\_\_\_\_

CSB certifying official legibly printed name

Agency:  
Date of Review: