

Columbus and Franklin County Continuum of Care Homeless Management Information System Governance Charter

The Columbus and Franklin County Continuum of Care (CoC) operates a Homeless Management Information System (HMIS) to record and store client-level information about the numbers, characteristics, and needs of persons who use homeless housing and services and for persons at risk of homelessness. The CoC uses the HMIS to aggregate data about the extent and nature of homelessness over time; produce an unduplicated count of homeless persons; understand patterns of service use; and measure the effectiveness of homeless assistance projects and programs. Data produced is used for planning, education and reporting purposes. The goal of the HMIS is to support the delivery of homeless and housing services in Columbus and Franklin County. The HMIS benefits individuals through enhanced service delivery; a tool for provider agencies in managing programs and services; and a guide for the CoC and funders regarding community resource needs and service delivery.

The CoC uses the local HMIS as the primary data source to evaluate efforts to implement *A Place to Call Home: A Framework for Action to Address Homelessness in Columbus and Franklin County* (Community Framework). The CoC uses the HMIS to enhance data collection activities related to the Community Framework and uses the HMIS as a monitoring, outcomes measurement, and performance-based contracting tool across systems, to inform the community about the progress of the Community Framework, and to meet U.S. Housing and Urban Development (HUD) requirements.

While accomplishing these goals, the CoC recognizes the primacy of client needs in the design and management of the HMIS, including the need to continually improve the quality of homeless and housing services with the goal of eliminating homelessness in Columbus and Franklin County and the need vigilantly to maintain client confidentiality, treating the personal data of our most vulnerable populations with respect and care. As the guardians entrusted with this personal data, we have both a moral and a legal obligation to ensure that this data is being collected, accessed and used appropriately. The needs of the people we serve are the driving forces behind our CoC's HMIS.

CoC Responsibilities

The CoC has HMIS responsibilities as described in the Columbus and Franklin County Continuum of Care Governance and Policy Statements as approved by the CoC.

1. Designate a single information system as the official HMIS software for the CoC.
2. Designate an HMIS Lead to operate the system.
3. Provide for governance of the HMIS Lead.
4. Maintain documentation demonstrating compliance with governance standards.
5. Review, revise, and approve policies and plans required by federal regulation.

CoC Board Responsibilities

The CoC Board has HMIS responsibilities as described in the Columbus and Franklin County Continuum of Care Governance and Policy Statements as approved by the CoC. The CoC Board works with the HMIS Lead to:

1. Develop, annually review, and, as necessary, revise a privacy plan, security plan, and data quality plan for the HMIS, and any other HMIS policies and procedures required by HUD.
2. Develop a plan for monitoring the HMIS to ensure that recipients and subrecipients consistently participate in the HMIS; the HMIS satisfies all HUD requirements; and the HMIS Lead is fulfilling the obligations outlined in the written CoC HMIS Policies and Procedures.

Designations

The CoC designates WellSky's software as the official HMIS for the CoC through 6/30/2021. Effective 7/1/2021, Bitfocus' Clarity Human Services software is the official HMIS for the CoC. The HMIS is also known as Community Services Portal (CSP).

The CoC designates Community Shelter Board (CSB) as the HMIS/CSP Lead to operate the CoC's HMIS.

HMIS Lead Responsibilities

1. Ensure that the HMIS complies with all HUD requirements and coordinate all related activities including training, maintenance, and technical assistance to Contributing HMIS Organizations (CHO). Monitor and enforce compliance by all CHOs and report on compliance to the CoC and HUD.
2. Ensure consistent participation in HMIS and monitor HMIS users to ensure that all recipients of financial assistance under the CoC and Emergency Solutions Grant (ESG) programs use the HIMS to collect client-level data on persons served.
3. Develop written policies and procedures and document all assignments and designations consistent with the policy. Annually update the Security Plan, Data Quality Plan, and Privacy Policy. During these annual updates, the HMIS Lead must incorporate feedback from the CoC Board and CHOs.
 - a. At a minimum, the privacy policy must include data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault, and stalking; and such additional information and standards as may be established by HUD in notice.
 - b. The security plan must meet the requirements as established by HUD in notice. The HMIS Lead must designate one staff member as the HMIS security officer and ensure that each CHO designates a security officer. The HMIS Lead must complete an annual security review to ensure the implementation of the security requirements for itself and CHOs. The HMIS Lead must ensure that each user completes security training at least annually and prior to being given HMIS access.
 - c. The HMIS Lead must implement a policy and chain of communication for reporting and addressing security incidents, as established by HUD in notice.
4. Execute a written HMIS Participation Agreement with each CHO, including the obligations and authority of the HMIS Lead and CHO, the requirements of the security plan with which the CHO must abide, the requirements of the privacy policy with which the CHO must abide, the sanctions for violating the Participation Agreement (e.g., imposing a financial penalty, requiring completion of standardized or specialized training, suspending or revoking user licenses or system privileges, or pursuing criminal prosecution), and an agreement that the HMIS Lead and the CHO will process Protected Identifying Information consistent with the agreement.

5. Develop a disaster recovery plan, which must include at a minimum, protocols for communication with staff, the CoC, and CHOs and other requirements established by HUD in notice.
6. Develop and implement a data quality plan. Set data quality benchmarks including bed coverage rates and service-volume coverage rates.
7. The HMIS Lead may archive data in the HMIS, but must follow standards published in Federal Register notices.
8. Submit reports to HUD as required. At least annually, or upon request from HUD, submit an unduplicated count of clients served and analysis of unduplicated counts.
9. Serve as the applicant to HUD for grant funds to be used for HMIS activities for the CoC, as directed by the CoC, and, if selected for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved activities.
10. Annually conduct an anonymous Administrator/User survey.
11. Schedule, coordinate, and hold quarterly HMIS Administrators meetings.

Reporting

The HMIS Lead will submit reports to HUD as required and within HUD-established deadlines. The HMIS Lead will oversee and monitor HMIS data collection and production of the following reports at the minimum:

1. Sheltered Point-in-Time Count (PIT Count)
2. Housing Inventory Chart (HIC)
3. Longitudinal Systems Analysis (LSA)
4. Annual Performance Reports (APR)
5. System Performance Measures (SPM)

HMIS Standards

The HMIS Lead, in contracting with the HMIS vendor, must require the vendor and the software to comply with HMIS standards issued by HUD as part of the contract.

Participation Fee

The HMIS Lead will collectively charge CHOs for a participation fee to be determined by the HMIS Lead, billed annually at the start of each fiscal year, for existing licenses, based on the number of licenses each CHO holds, both access and reporting licenses. CHOs will purchase additional user licenses and reporting licenses through the HMIS Lead, at a cost established by the HMIS Lead.

Training and Technical Assistance

The HMIS Lead is responsible for the following:

1. Schedule, coordinate, and hold quarterly HMIS Administrator meetings
2. Ensure required basic training is regularly available and accessible to CHOs
3. Ensure that technical assistance is regularly available and accessible to CHOs.
4. Ensure that CHOs have access to the reports, technical assistance, and training required to develop a data quality improvement plan when necessary.

CHO Responsibilities

The CoC has established an HMIS Administrators Group – a provider group comprised of representatives of agencies using the local HMIS – as a committee under the CoC. The group discusses and implements developments and improvements to the system. CHOs are expected to participate. Each agency with access to the HMIS must have two designated administrators. Both are invited to participate in the quarterly meetings.

CHOs must comply with federal HMIS regulations and requirements. CHOs must comply with federal, state, and local laws that require additional privacy or confidentiality protections. When a privacy or security standard conflicts with other federal, state, and local laws to which the CHO must adhere, the CHO must contact the HMIS Lead and collaboratively update the applicable policies for the CHO to accurately reflect the additional protections. CHOs must abide by the CoC’s written HMIS Policies and Procedures. The HMIS Lead and CHOs are jointly responsible for ensuring that HMIS processing capabilities remain consistent with the privacy obligations of the CHO. CHOs must use the HMIS guidance, documentation, and forms posted on CSB’s website (www.csb.org).

April 6, 2021

Keith McCormish
Chair, Continuum of Care

Date