



2008 HMIS TRAINING

SETTING THE STANDARD

Proposed Revisions to the HMIS Data and Technical Standards: Roles and Responsibilities for HMIS Oversight and Management

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September 22, 2008





Governance Overview

- HUD's HMIS Governance Goals
- Context and Terms
- Governance Models
- Group Discussion
- Governance Roles by HMIS Entity
- More Group Discussion



Governance Context

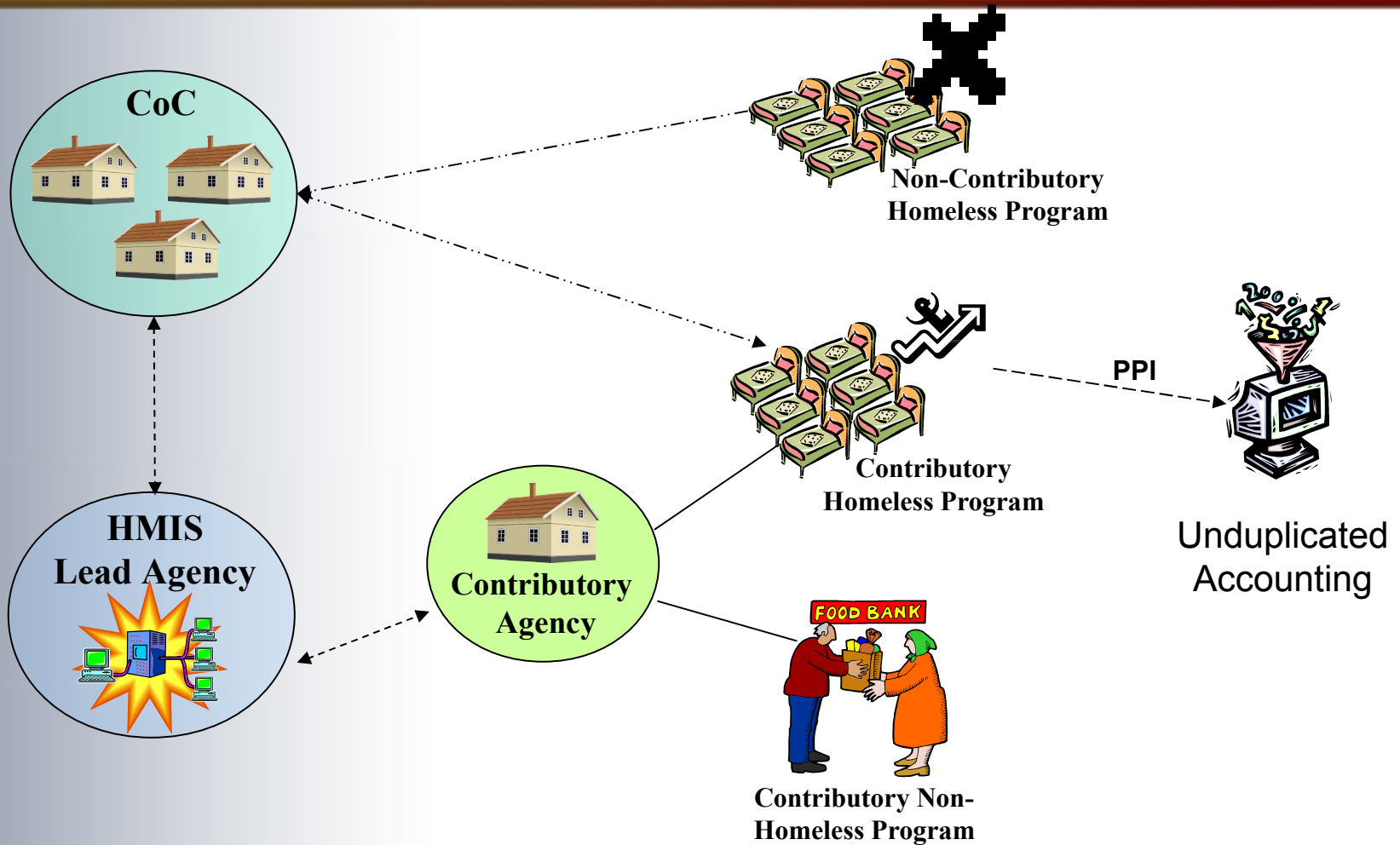
HUD's HMIS governance standards:

- Provide **new** guidance to CoCs;
- Define the relationship between the HMIS implementation and the CoC;
- Establish organizational requirements for the HMIS implementation;
- Formalize leadership and oversight expectations; and
- Provide structure for decision-making.

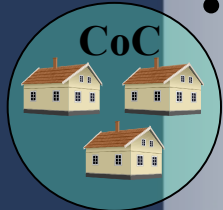

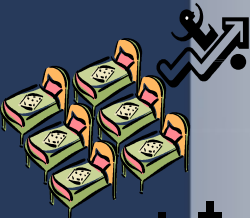

Governance Context

- **Each HMIS implementation is different** – CoCs are comprised of various collaborations among CoC leadership, HMIS project management, Homeless assistance programs, and other organizations (statewide, multi-CoC collaborative, public-private, etc.).
- **Governance application will be different** – HUD's governance model provides broad structure for governance but requires that each CoC define governance in a manner that addresses the unique roles and relationships within the HMIS implementing jurisdiction.

HMIS Governance Structure Example



Terms

- **Continuum of Care (CoC)** – The primary decision-making entity of the CoC.

- **Contributory HMIS Organization (CHO)** – Organization that operates a contributory homeless assistance program and/or a contributory non-homeless assistance program.

- **Contributory Program** – A program, operated by a CHO, that contributes Protected Personal Information (PPI) or other client-level data to an HMIS.

- **Non-Contributory Program** – A program that does not contribute PPI or other client-level to an HMIS.


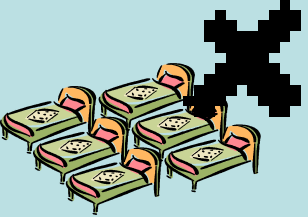
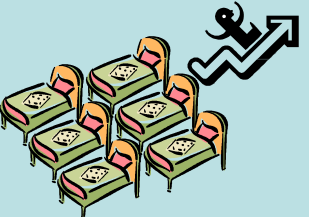


Terms (cont.)

- **Homeless Assistance Program** – Program, identified by CoC as part of its homeless assistance system, whose primary purpose is to meet specific needs of people who are homeless.
- **Unduplicated Accounting of Homelessness** – Measure of extent and nature of homelessness, utilization of homeless programs over time, and effectiveness of homelessness programs.
- **HMIS Lead Agency (HMIS Lead)** – Organization designated by a CoC to operate the CoC's HMIS.

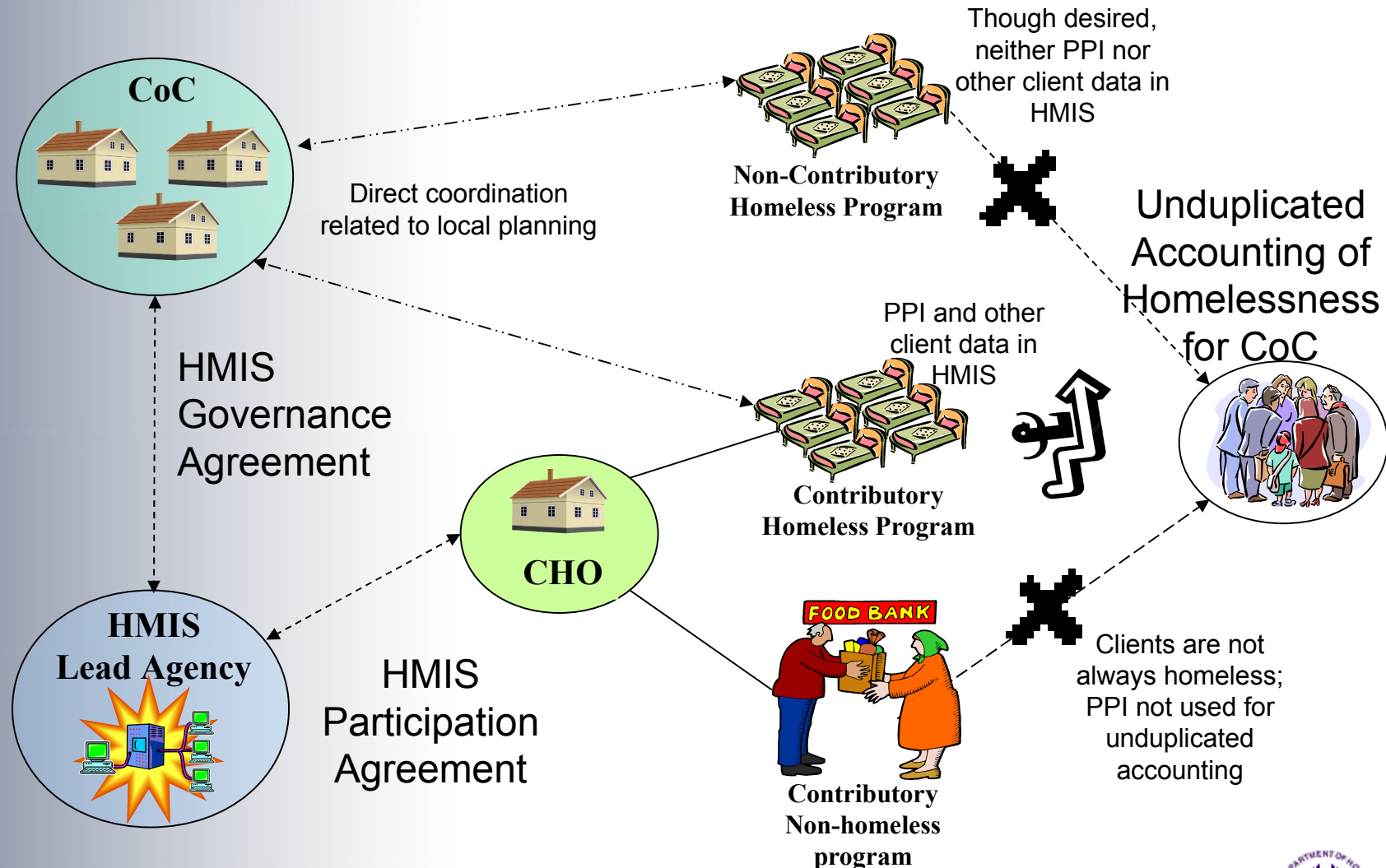
Terms (cont.)

- **End User** – An employee, volunteer, or other person affiliated with a CHO who uses or enters data in the HMIS or other administrative database from which data are periodically uploaded to the HMIS.
- **HMIS Vendor** – A contractor who provides HMIS software and/or support services for the operation of a CoC's HMIS.
- **HMIS Participation:**
 - Programs must attempt to record all the universal data elements on all clients served and disclose to HMIS Lead at least once annually
 - All homeless assistance programs should participate
 - Victim Service Providers (as defined by VAWA) are excluded from disclosing PPI to HMIS

Another Way to Look at the Definitions

Homeless Assistance Programs		Non-Homeless Assistance Programs	
 <p>Non-Contributory</p>	 <p>Contributory</p>	 <p>Contributory</p>	<p>TANF Office</p>  <p>Non-Contributory</p>
		<p>Contributory HMIS Organization – an organization that operates either type of Contributory program</p>	
<p>HUD's Goal for the Future of HMIS: All Homeless Assistance Programs participate in HMIS</p>			

HMIS Governance Structure





Governance Questions for Discussion: Part 1

Has HUD defined the right approach to HMIS project governance?

- Recommended approach is consistent with current practice, current needs?
- Model provides enough flexibility to cover diversity of community structures yet detailed enough to formalize decision-making processes?

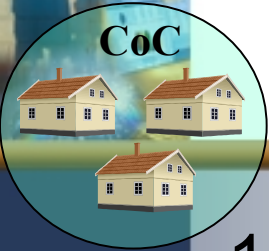


Governance Roles

There are many different roles involved in operating an effective HMIS that are compliant with the Data and Technical Standards. Roles and responsibilities are different for the following entities:

- CoC
- HMIS Lead Organization
- Contributory HMIS Organizations (CHO)
 - Contributory Homeless Assistance Programs
 - Contributory Non-Homeless Assistance Programs
- Non-Contributory Homeless Assistance Programs
- End Users
- HMIS Vendor

Governance Requirements for CoC



1. HMIS Oversight

- Must conduct appropriate oversight and ensure compliance with HMIS Standards.

2. Designate HMIS Lead Agency

- Documented by formal resolution of CoC governing body.
- CoC may designate itself or a CHO as HMIS Lead Agency, but HMIS roles must be distinct and defined in writing.

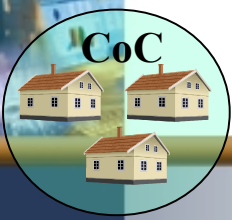
Governance Requirements for CoC (cont.)



3. Execute HMIS Governance Agreement

- Written agreement between CoC lead with the HMIS Lead Agency, specifying functions and responsibilities of the HMIS Lead Agency
- Define responsibilities for management of HMIS in a manner that meets HUD's standards.
- Define rights, obligations, timeliness, and transition procedures for HMIS governance, software, and data, in the event that the agreement is terminated
- Update or renew annually

Governance Requirements for CoC (cont.)

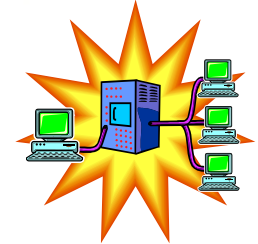


4. Formal Designation of HMIS Software

- ***Only one system is the HMIS.*** The CoC must designate one system to be used by CoC for unduplicated accounting of homelessness.
- ***A CoC may include data from multiple systems.*** CoC may include data from multiple community and/or agency information systems with PPI about persons who are homeless (e.g., systems integration, data warehouse).
- ***HMIS lead agency may lead process to select software.*** The CoC must approve and may change software if needs or requirements are not met.

Governance Requirements for HMIS Lead

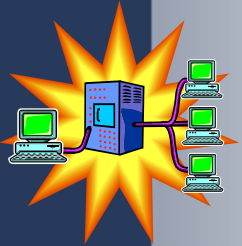
1. Develop local HMIS policies and procedures
2. Execute HMIS participation agreements
3. Monitor compliance with applicable HMIS standards
4. Establish End User Agreements (EUA)
5. Establish vendor agreements/contracts
6. Conduct unduplicated accounting of homelessness



Governance Requirements for HMIS Lead

1. Develop and Adopt Local HMIS Policies and Procedures

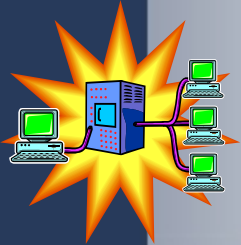
- CHOs may participate in HMIS differently and have different expectations for levels of HMIS access, client protections, security, privacy, management, etc.
- Does your community collect, manage, and report on client data in the same way for all programs?



Governance Requirements for HMIS Lead

1. Develop and Adopt Local HMIS Policies and Procedures (cont.)

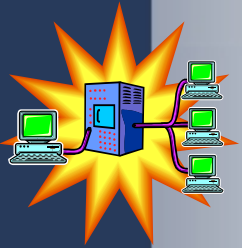
- Local HMIS Policies and Procedures include:
 - Data Quality Plan
 - Security Plan
 - Privacy Policy
- Must be submitted to CoC w/in 6 months following final Notice; operational w/in 12 months
- Reviewed, updated and approved annually by CoC



Governance Requirements for HMIS Lead

2. Execute HMIS Participation Agreements with each CHO

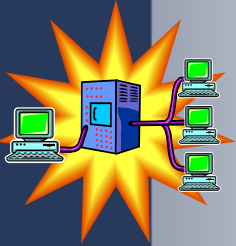
- HMIS Lead executes agreement with each CHO on behalf of CoC.
- Participation agreement defines obligations and authority of HMIS Lead and terms of participation for CHO.
- Participation Agreement will need to account for differences in program type:
 - Contributory or Non-Contributory
 - Homeless Assistance or Non-Homeless Assistance



Governance Requirements for HMIS Lead

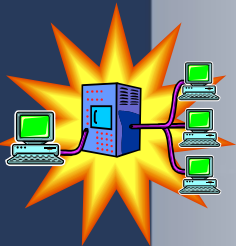
2. HMIS Participation Agreements (cont.)

- Define HMIS Lead obligations for securing and protecting the privacy of the CHO's PPI and other data.
- Specify any obligations or limitations for processing PPI imposed upon HMIS Lead by CHO.
- Specify uses and disclosures of PPI.
- Reflect HUD's requirements in HMIS Standards.
- Describe any additional local standards.
- Address any other applicable laws.



Governance Requirements for HMIS Lead

3. Monitor Compliance with Applicable HMIS Standards
 - Establish and follow procedures to ensure and monitor for compliance
4. Establish End User Agreements (EUA)
 - Execute (with CHOs) End User agreements with all users outlining their responsibilities in relation to the HMIS
5. Establish and Execute Vendor Agreements/ Contracts
 - May be with CHO
 - Must comply/require compliance with the HMIS Standards as appropriate.
6. Conduct Unduplicated Accounting of homelessness on behalf of CoC



Governance Requirements for CHO

- Compliance with all applicable Agreements.
- Execute (with HMIS Lead Agency) and manage End User Agreements with all CHO staff who have HMIS access.
- Establish and Execute Vendor Agreements/ Contracts (if applicable)
 - With HMIS Lead Agency
 - Must comply/require compliance with the HMIS Standards as appropriate.



Contributory
Agency



Governance Questions for Discussion: Part 2

What changes or refinements to the HMIS Governance Standards would you recommend to HUD?

- Additions...
- Deletions...
- Technical Assistance resources...
- Other considerations?