

*Shasta County Homeless
Management
Information System
(HMIS) Review*

November 2015

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INTRODUCTION

This REVIEW is a supplement to the *Recommendations for Building Capacity in the Redding/Shasta County Homeless System of Care* report prepared by HomeBase. It provides recommendations on strengthening Shasta County's Homeless Management Information System (HMIS).

Symmetric Solutions, Inc. is a professional consulting firm specializing in large-scale human service software implementation projects, including project evaluation, assessment of HUD compliance, project planning, implementation strategies, software evaluation and implementation oversight. To ensure an objective and neutral approach, Symmetric Solutions, Inc., is not affiliated with any software or service vendor.

For this project, our objective is to review the various aspects of the current HMIS implementation and make recommendations how it can be improved upon. Since this report is fairly technical, we have provided a simple HMIS background and glossary of terms as Appendix B. If you are unfamiliar with HMIS it might be helpful to read through this before reading the document.

HMIS is a shared electronic data collection system that stores client level information for reporting on a community's homeless and at risk population. It can be used locally to gain a better understanding of the community's characteristics and needs. Additionally, the U.S. Department of Housing and Urban Development ("HUD") uses Homeless Management Information System ("HMIS") data to inform homeless policy at the federal, state, and local levels.

The Shasta County HMIS implementation is now in a transition/expansion phase. Currently HMIS staffing relies on a single County employee, allocating less than 8 hours per week to HMIS. This limited staffing proved adequate during the early phase, but will not suffice with the addition of new agencies to the HMIS. Many stakeholders throughout the community would like HMIS to expand participation and potentially act as the main data collection tool for the required Coordinated Entry project. However, at this time, all stakeholders are challenged by the lack of HMIS funding.

General Recommendations

The Shasta County HMIS implementation is relatively new and rapidly expanding. There are many good things in place that can be the basis for any changes made. This report highlights the improvements this system will need to be more effective and able to track and monitor data across the homeless system.

These improvements include:

- Establish a realistic HMIS budget and revenue sources that will help the Lead Agency staff the project appropriately. This will remove the main barrier for expanding participation to other homeless providers.
- Establish a formal HMIS Committee guided by written operating procedures and purpose. Encourage an inclusive culture for all stakeholders.
- Review and update the current Draft Redding/Shasta County HMIS Policies and Procedures Manual (Policies and Procedures Manual) through the HMIS Committee and make required changes. Be sure any new requirements included in the 2014 standards are included.
- Gain final approval through the CoC and implement Policies and Procedures Manual.
- Review current Data Quality Plan through the HMIS Committee and add required changes. Be sure any new requirements included in the 2014 standards are included.
- Gain final approval through the CoC and implement this Data Quality Plan.
- Develop common vision around HMIS goals and objectives.
- Educate and promote awareness of HMIS throughout the community. Show the value of having accurate community data.
- Focus on county-wide data collection. Review Coordinated Entry requirements and evaluate possible technology solutions. Determine if the HMIS software should be a major role in this system.
- Define and develop Performance and Outcome standards.
- Establish HMIS software performance standards.
- HMIS Committee should evaluate current HMIS software to determine if it meets the newly established software standards. If a change is recommended, conduct a formal review of available HMIS software products and work through the RFP process. (See Appendix D. Sample RFP)

GENERAL HMIS IMPLEMENTATION Status:

The HMIS implementation is now in a transition/expansion phase. Shasta County Housing and Community Action Agency currently acts as HMIS Lead Agency. As Lead Agency, they are required to recommend a HMIS software to the CoC for approval. It is also their task to implement and support the approved software. They selected CSN (developed and supported by Bell Data Systems) in approximately 2013. At that time only one program was being entered. In October of 2014, the two CoC Supportive Housing Program (SHP) grant recipients began entering their data. In January 2015, two more agencies agreed to purchase licenses. These new agencies are in the early stages of implementation.

Currently HMIS staffing relies on a single County employee, allocating approximately 10%-20% of full time hours to HMIS. This limited staffing proved adequate during the early phase, but will not suffice with the addition of the new agencies. The Lead Agency should consider increasing these hours to at least a half time position. If participation increases, and/or the HMIS software becomes the primary tool for the upcoming Coordinated Entry project, this figure could easily double. HMIS implementations are complex and adequate financial support is critical.

According to our interviews, all stakeholders are challenged by the lack of HMIS funding. Since the community does not have a SHP grant in place for the HMIS Project, the Lead Agency and HMIS Contributing HMIS Organizations (CHO's) cover all costs associated with software and support. This persists as a significant barrier for increasing coverage and providing adequate system administration. Many stakeholders throughout the community would like HMIS to expand participation and potentially act as the main data collection tool for the required Coordinated Entry project. This obviously has a huge impact on the software and support costs. Communities must understand these costs and obtain the appropriate funding.

Funding limitations may have forced the community to select the least expensive HMIS software available. This product appears to have met the needs of the Lead Agency for the initial stages of the project, but as the implementation grows (thus demanding expanded performance from the product) it may not be the best choice.

It is a good practice to engage in a formal review of the HMIS software on a regular basis. This assures that the software being used is compliant with all state and federal regulations and remains a "good fit" for the community as it grows and changes. It is recommended that the HMIS Committee conduct this formal review. It is important to finish this process before including any additional agencies. This review may include the current Bell Data product along with other competitive HMIS products currently

offered. The sample RFP attached as Appendix D should help the Committee better understand their current needs, and in turn choose the best solution, even if the current CSN product remains in place.

Governance:

HMIS implementations should always be guided by a set of roles and responsibilities set forth in a formal HMIS Policies and Procedures manual. This manual should be developed collaboratively by the HMIS Committee and formally approved by the Continuum of Care.

Currently, Shasta County has a draft Policies and Procedures manual developed by the Lead Agency in 2013. This document includes the main components recommended by HUD but appears to be missing adequate detail to be effective. A more complete list of Roles and Responsibilities is included in this report as Appendix C, which can be used by the HMIS Committee to help expand the existing document.

Generally, HMIS implementations rely heavily on the presence of an HMIS Committee. This committee takes a central role in the development, implementation and monitoring of its Policies and Procedures. Members are usually those from agencies either using HMIS or are contributing to the community-wide data through other data collection systems. They are often case managers and Agency Administrators.

During our initial conversations, the Lead Agency stated that such a body does exist and meets occasionally. In our more recent interviews with the HMIS stakeholders, we discovered that most are unaware of this committee. Further interviews revealed that the responsibilities of developing and managing this committee were assigned or referred to the Redding Homeless Day Resource Center around January 2015. It appears from interviews that further steps have not yet been taken. We strongly recommend that this committee begin meeting regularly as soon as possible and ensure it includes participants from a broad range of service providers from the community.

Circulated to stakeholders in the community as of its initial release, the draft Policies and Procedures are used during the initial software end user trainings. Unfortunately, our findings show that most CHO staff remain unfamiliar with the policies to which they are required to adhere. This becomes most apparent when evaluating Data Quality and Reporting. The two CoC grant recipients were trained to use the HMIS software in October of 2014. After this initial training, these users received some telephonic support, but no training relating to data quality or basic report generation. Since these agencies receive SHP grant funding, HUD requires both to submit an accurate APR

(Annual Performance Report) each year. At the time of the interviews, neither agency knew how to run this report. This critical report assures their grant continues to renew. We recommend steps to ensure CHO staff using HMIS are familiar with the Policies and Procedures once they have been adopted by the CoC. Further recommendations relating to data quality and reporting and training are included below.

HMIS Data Quality Plan:

HMIS implementations are complex. They require extensive data quality oversight using the implementation of a comprehensive Data Quality Plan. This plan sets out the policies and procedures that all participating individuals must follow to ensure the completeness and consistency of the HMIS data. Without this plan, data quickly yields unreliable measures. This becomes very apparent when adding additional agencies and users to the software (which is currently taking place). It is critical all users be fully trained and working from the same set of standards. It is also critical that the software contains, and the users can produce, helpful data quality reports. Although the draft Policies and Procedures include a section for this, it is quite brief and, as stated before, remains in draft form. Once in place, the HMIS Committee should review, make necessary additions and submit to the CoC for approval.

Reporting is a primary component of a Data Quality Plan. In order for the Lead Agency and CHOs to monitor their work, the necessary reports must be available. The Data Quality Reporting section of the draft Policies and Procedures makes reference to two reports built into the CSN software called “Data Quality Report” and “Data Quality Detail Report.” Per our request, the Lead Agency provided the “DQ Data Standards Report - Summary” for our review; the detail report was not provided due to confidentiality concerns. This summary report appears to only disclose “null values” based upon the 2014 HMIS data standards. Upon further review of the report, we found a few points of concern. Presently, the first two lines of the report list more households than clients. Furthermore, 10 of the required data elements are “missing data”, with some elements missing for as many as 19 of the 21 listed clients.

Additional reports should be included in the Data Quality Plan that assist the Lead Agency and CHOs to validate unduplicated counts and help monitor the Data Accuracy Benchmarks. If these are not included among the standard reports within the HMIS software, custom reports should be developed.

Data integration allows for the inclusion of data from non-participating homeless providers. This can be accomplished by uploading data from outside systems directly into HMIS. In our interviews, it was communicated that Good News Rescue Mission might be a candidate for this process. They were working with the software vendors to

see how this could be done. Before any data upload occurs, there needs to be strict policies and procedures implemented with proper controls in place to insure data quality. There is currently not a section in the draft for this.

Privacy Standards:

Privacy Standards seem to be in place, and CHOs communicated that these policies are fully implemented. This includes the Privacy Policy, Mandatory Collection Notice and Information Consent Process. Presently, no client level data sharing exists between agencies. It is our understanding that the community plans to implement sharing over the next several months. We recommend the Electronic Data Sharing Policy be fully developed and implemented before any data sharing occurs. The current data sharing agreement section of the Policies and Procedures states, “The terms of the data sharing agreement template will be drafted by the lead agency for review by the HMIS Committee prior to executions by any CHO’s.” We also recommend that all stakeholders fully understand the sharing capabilities of the HMIS software and assure the setup is consistent with the approved Data Sharing Agreement (DSA).

Security Standards:

The Security Standards section seems to be in place and contain the minimum requirements. According to the standards, the Lead Agency must complete an annual security review using a security checklist. Based on our interviews, this review has not happened. As the agencies have not been entering data for a full year yet this review is not yet overdue. We recommend a review be scheduled to ensure it is timely.

Reporting:

HMIS reporting is complex. HUD has suggested a list of reports that each HMIS software should be able to produce. Additionally, communities want to use their HMIS software to produce custom, community-wide reports. This seems to be an area greatly lacking in the current implementation. This may be due to limitations in the HMIS software, or lack of system administrator training and support by the vendor, or both.

As part of our review, we requested that the Lead Agency produce a list of critical reports directly from the software. While examples of the CoC APR, AHAR and Transitional PATH were provided, they were unable to supply a Sheltered Point-in-Time (PIT), Housing Inventory Chart (HIC), ESG CAPER, SSVF export, RHY Export, HMIS

APR, Duplicate Client Report or reports adequate to monitor data quality benchmarks as described in the draft Data Quality Plan.

Although the Sheltered Point-in-Time count and Housing Inventory Chart is being completed separately from HMIS, HUD strongly encourages this to come directly from the HMIS software. As the participation in HMIS increases, this report becomes much more important.

The Emergency Solutions Grant (ESG, Consolidated Annual Performance and Evaluation Report (CAPER), Supportive Service for Veteran Families (SSVF) Export and Runaway Homeless Youth (RHY) reports are mandatory if the county intends to obtain these grants. There are currently no RHY grants in Shasta County and the CAPER is completed by the state, so this is not currently a problem. But the Shasta County SSVF grant is being managed by Veteran's Resource Centers of America out of Humboldt County. HUD encourages SSVF data to be collected in the HMIS system of the community where the clients are being served. This should be Shasta County. Summary data is provided by VRCA for the annual reports, but no detail data is available. This data is valuable for any community-wide reporting.

The Duplicate Client Report is a crucial part of overall data quality. The Draft Policies and Procedures includes a section (5.4) addressing the desire to reduce duplication, but without a report to find these duplicates it seems difficult for the System Administrator or Agency Administrators to assure compliance.

Data Quality Benchmarks have the same challenge. Section 5.2 of the Draft Policies and Procedures lists the appropriate policies but offers no reporting mechanism to assure compliance.

Training and Technical Assistance:

Any successful software implementation requires adequate training and comprehensive follow-up support. This assures dependable information from the HMIS system. Communities are not only able to use their data to meet the minimum HUD requirements, but also help make key decisions relating to their homeless populations. This training is normally offered to all HMIS users on a regular basis. Since entering data into any HMIS system is complex, a staged training approach usually yields the best results. This gives the users time to understand the basic functions before adding additional features. The training is also normally broken down into a few categories based on the level of access the user has. A basic user will enter new clients into their programs by completing entry enrollment, interim and exit assessments. This is where the required data elements are collected in compliance with the 2014 HUD data Standards. More advanced users (Agency Administrators) may add case management

data and will usually oversee the administrative requirements including data quality and reports.

The Training and Technical Assistance section in the draft Policies and Procedures is very brief and does not give much detail regarding the content, format and frequency. Based on our interviews, we found most users feel under trained, especially in the areas of reporting and data quality. As mentioned previously, the two CoC grant recipients were not able to access any reports after ten months of entering data and expressed a desire for more training.

Currently, the Lead Agency conducts a single on-site training for each new agency and additional support is requested by the end users. It appears there are no formal training manuals offered by the software vendor.

We suggest enhancing as follows:

- Expand the training and support section in the Redding/Shasta County Policies and Procedures to include a staged approach.
- Develop and implement end user training manuals specific to the HMIS software product.
- Publish any training materials provided by the software vendor and make available to all users.
- Conduct an initial basic use training covering Entry, Interim and Exit Assessments.
- Conduct a second formal training covering data quality monitoring and basic report generation. This session should be conducted within two-four weeks of the initial training.
- Offer on-going refresher trainings at the HMIS Committee meetings that include more complex issues such as case management, Agency Administrator responsibilities and questions regarding interpretation of HUD Data Standards.

Budget

There is no formal budget for the HMIS project at this time. As mentioned previously, the agencies are required to pay for all software licenses and technical support themselves. It is recommended that the Lead Agency and/or the HMIS Committee work through a formal budget process as part of their HMIS software evaluation. This will help allow the community to select a software that is the best fit for them now and

in the future. It will also illustrate the amount of work required to adequately support the project.

When considering an HMIS budget, most costs fall under a few main categories: System Administration, Technical Support and Training, Software Licenses/Maintenance and Lead Agency Grant Administration.

In implementations similar in size (30 – 50 user licenses) and complexity, an overall budget tends to be between \$80,000 and \$150,000 annually. This amount does not include Coordinated Entry costs in most cases.

This may be broken down as follows:

Software Licenses/Maintenance	\$28,000 - \$50,000
System Administration	\$27,000 - \$52,000
Training and Support	\$24,000 - \$43,000
Grant Administration	\$1,000 - \$5,000

Appendix A

Methodology

Our evaluation process included a number of on-site and telephonic interviews covering a broad range of questions. Industry standard tools provided by HUD and associated consultants were used to collect the appropriate data needed to develop a clear understanding of the current status. We compare our findings to the most current federal requirements to determine our recommendations.

The following stakeholders were interviewed:

Shasta County Housing and Community Action Program
Northern Valley Catholic Social Service (NVCSS)
Faithworks Community Coalition, Inc.
Good News Rescue Mission (GNRM)
Shasta County Health and Human Service Agency (HHSA)
One Safe Place
Shasta County 2-1-1
Redding Homeless Day Resource Center
Participants of the Stakeholders Workshop on July 16

Appendix B

I. HMIS Background

The U.S. Department of Housing and Urban Development (“HUD”) uses Homeless Management Information System (“HMIS”) data to inform homeless policy at the federal, state, and local levels. The HEARTH Act, enacted in 2009, requires that all recipients and sub recipients of Continuum of Care (“CoC”) Program and Emergency Solutions Grant (“ESG”) funds participate in their CoC’s HMIS. The CoC Interim Rule (24 CFR 578) defines CoC HMIS responsibilities, including:

- Selecting an HMIS software solution
- Designating an eligible applicant to manage the HMIS (the “HMIS Lead Agency”)
- Providing oversight for key HMIS policies
- Working with the HMIS Lead Agency to ensure consistent provider participation
- Ensuring the quality of HMIS data

In addition, the HMIS Proposed Rule (76 FR 22 76917) includes more specific HMIS requirements, including: the duties of the CoC; the duties of the HMIS Lead Agency; and security, data quality, privacy and technical standards.

With the Exception of Victim Service Providers defined by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA), all homeless assistance programs that are a part of the Continuum of Care must participate in the HMIS, whether or not the specific program receives direct funding from HUD or other federal agencies. A particular program (or part of a program, such as a subset of beds within a program) is considered “participating” in HMIS if, as a matter of general practice, the program makes reasonable efforts to record all the Universal Data Elements for all clients served and discloses these data elements to the HMIS Lead Agency at least once annually. Disclosure may occur by directly entering data in the HMIS, electronically transferring data to the HMIS Lead Agency, or through other means determined with the HMIS Lead Agency. Such an HMIS participant is called a “Contributory HMIS Organization (“CHO”)” in these HMIS Policies & Procedures.

II. Definition of Terms

AHAR: Annual Homeless Assessment Report

APR: Annual Performance Report (formerly Annual Progress Report)

CoC Governance Charter: The document that governs the roles, responsibilities and operations of the CoC, Council, Committees, Lead Agency, Collaborative Applicant, and HMIS Lead Agency

CHO (Contributory HMIS Organization): An organization that enters data into the HMIS Software System in compliance with the CHO Participation Agreement and under the oversight of a CHO HMIS Administrator

CHO HMIS Administrator: A CHO staff person who is responsible for compliance with the CHO Participation Agreement and day-to-day operation of CHO data collection in HMIS

CHO Participation Agreement: An agreement entered into by the HMIS Lead Agency and CHO that describes the obligations and authority of the parties with regard to data collection, input, management and reporting

Client: A living individual about whom an Agency collects or maintains PPI

CoC: Continuum of Care

End User: An employee, volunteer, affiliate, associate, and any other individual acting on behalf of a CHO or HMIS Lead Agency who uses or enters data into the HMIS Software System or another administrative database from which data are periodically uploaded to the HMIS

HIC: Housing Inventory Chart

HMIS: Homeless Management Information System

HMIS Committee: Committee established by the local CoC to provide support and recommendations to the local CoC regarding HMIS policies and procedures; composed of staff representing the CoC and HMIS Lead Agency, and all CHO HMIS Administrators

HMIS Software System: An HMIS data management software program developed and serviced by an HMIS Vendor

HMIS Lead Agency: An organization designated by a CoC to operate the CoC's HMIS

HMIS Vendor: Contractor who provides support services for the operation of a CoC's HMIS by contract, including the HMIS Software System provider, web server host, as well as providers of other contracted information technology or support

HUD: U.S. Department of Housing and Urban Development

NOFA: Notice of Funding Availability

PIT: Point in Time Count

PPI: Protected Personal Information

Security Officer: A staff person within the HMIS Lead Agency, and each CHO, that is responsible for their agency's compliance with the Security Plan established in the *HMIS Policies and Procedures Manual*.

Appendix C – Roles and Responsibilities

1. Local CoC

The local CoC is responsible for HMIS Project oversight and implementation, which encompasses planning, administration, software use, and HMIS Data management in compliance with HUD HMIS Standards. The CoC is also responsible to review and approve all policies, procedures, and data management plans governing CHOs. More specific responsibilities are listed below.

- Designate a single information system (the HMIS Software System) as the official HMIS software for the geographic area.
- Designate an HMIS Lead.
- Approve all HMIS policies, procedures and operational agreements.
- Develop a Governance Charter which includes a requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Contributing HMIS Organization (CHO) and such additional requirements as may be issued by notice from time to time.

2. HMIS Committee

The HMIS Committee is designated by the local CoC to provide support and recommendations to the local CoC related to the HMIS regulations and standards as set forth by HUD. The HMIS Committee consists of staff representing the local CoC, the HMIS Lead Agency, and all CHO HMIS Administrators.

3. HMIS Lead Agency

The HMIS Lead Agency manages HMIS data in compliance with HUD HMIS Standards, collects and organizes HMIS data within a data management software program (the “HMIS Software System”), and provides HMIS Project administrative functions at the direction of the CoC, through its CoC Council, and as further described in the HMIS Lead Agency MOU. Other principle responsibilities include:

Governance, Policy Development and Reporting

- a Draft policies, procedures and standards in accordance with the CoC Interim Rule, Proposed HMIS Rule, and 2014 HUD HMIS Data Standards;
- b Submit a security plan, data quality plan, and a privacy policy to the CoC for approval, to updated as needed;
- c Ensure implementation of policies, procedures and standards;
- d Ensure consistent participation by funding recipients;
- e Schedule and facilitate regular HMIS Committee meetings;
- f Prepare the following data reports and analyses for review by the CoC Council and for submission to HUD: PIT Count; AHAR; HIC; unduplicated counts of clients served annually; count of lodging units in the HMIS; and other reports as necessary to measure progress in meeting goals set by the CoC;
- g Respond to CoC Council and HMIS Committee directives;
- h Work with the CoC Council to facilitate participation by all programs serving homeless people to participate in the HMIS.

System Administration and Security

- a Serve as the applicant to HUD for grant funds to be used for HMIS activities in the CoC’s geographic area, and enter into grant agreements with HUD to carry out HUD-approved activities, as further described in the HMIS Lead Agency MOU;
- b Oversee the day-to-day administration of the HMIS system;

- c Manage the HMIS Software System Vendor and other HMIS Vendors in compliance with current HUD requirements and Proposed HMIS Rule technical standards;
- d Retain copies of all contracts and agreements executed for HMIS administration;
- e Designate a Security Officer responsible for ensuring compliance with applicable security standards, after conducting a criminal background check;
- f Require persons with access to all HMIS records to undergo a background check;
- g Keep all signed statements for a period of at least 3 years;
- h Implement a policy and chain of communication for reporting and responding to security incidents;
- i Develop a disaster recovery plan, which includes protocols for communication with staff, CoC and CHOs;
- j Complete an annual security review.

CHO and End User Coordination

- a Monitor and enforce compliance by all CHOs with HUD requirements and report on compliance to the CoC and HUD;
- b Communicate HUD HMIS Standards updates to all CHO HMIS Administrators;
- c Prepare and execute Participation Agreements with each CHO, which include
 - a The obligations and authority of the HMIS Lead Agency and CHO;
 - b The requirements of the Security Plan with which the CHO must abide;
 - c The sanctions for violating the Participation Agreement;
 - d Agreement that the HMIS Lead Agency and CHO will process Protected Identifying Information consistent with the agreement;

- d Update contact list of all CHO HMIS Administrators in conjunction with annual Participation Agreement updates;
- e Manage and maintain mechanisms for soliciting, collecting and analyzing feedback from End Users, CHO HMIS Administrators, CHO Program Managers and Executive Directors, and homeless persons;
- f Document technical issues experienced by End Users.

Training and Technical Assistance

- a Develop and deliver a comprehensive training curriculum and protocol for CHO HMIS Administrators and End Users that assures all data being entered is complete and accurate.
- b Provide technical assistance and support to CHO HMIS Administrators and End Users.

Data Quality

- a Develop and implement the Data Quality Plan;
- b Establish data quality benchmarks for CHOs (calculated separately for: emergency shelter, safe haven, transitional housing and permanent housing), including bed coverage rates, service-volume coverage rates, missing/unknown value rates, timeliness criteria, and consistency criteria;
- c Coordinate with CHO HMIS Administrators to produce required reports;
- d Run and disseminate data quality reports on a quarterly basis to CHO programs indicating levels of data entry completion, consistency with program model, and timeliness;
- e Provide quarterly reports on HMIS participation rates, data quality and other analyses to the CoC Council and HMIS Committee.;
- f Monitor compliance by all CHOs with HMIS participation requirements, policies and procedures, privacy standards, security requirements, and data quality standards through an annual review per the process outlined in the Participation Agreement;

- g Manage HMIS Software System upgrades and ensure that they comply with the latest HUD Data Standards; and
- h Distribute HUD Data Standards and provide guidance to CHOs on compliance.

4. Contributing HMIS Organizations (CHOs)

CHOs operate a provider program and contribute Protected Personal Information or other client-level data to the HMIS Software System. CHOs must enter into and comply with CHO Participation Agreements in order to contribute such data to the HMIS Software System. Principle responsibilities described in this *HMIS Policies & Procedures Manual* include.

Data Quality

- a Collect the universal data elements, as defined by HUD, for all programs operated by the agency that primarily serve persons who are homeless or formerly homeless;
- b Collect program specific data elements, as defined by HUD, for all clients served by programs funded by HUD grants allocated to the CoC;
- c Enter client-level data into the HMIS within seven days of client interaction;
- d Follow, comply and enforce the CHO Participation Agreement.

Security

- a Designate a Security Officer;
- b Conduct criminal background checks on the Security Officer and all End Users;
- c Ensure that all End Users receive security training prior to being given access to the HMIS, and once annually.

Privacy

- a Uphold confidentiality requirements;
- b Receive a Client Acknowledgement of Data Entry for each Client PPI entered into the HMIS Software System;
- c Post the HMIS Notice of Privacy Practices so that is viewable to all Clients.

Training

- a Participate in comprehensive training curriculum developed by the HMIS Lead Agency.

5. CHO HMIS Administrator

A CHO HMIS Administrator is designated by each CHO to oversee day-to-day operation of its data collection system, ensuring program-level data quality according to the terms of the CHO Participation Agreement and associated Data Quality Plan, and managing data entry into the HMIS Software System. The CHO HMIS Administrator participates in quarterly HMIS Committee meetings and HMIS training meetings. Following are responsibilities with regard to Data Quality:

- a Be the first point of contact for End Users experiencing difficulties in using HMIS;
- b Maintain End User list within the CHO;
- c Monitor End User logins on a monthly basis;
- d Complete data entry when End Users are unable to complete data entry;
- e Ensure CHO compliance with the protocols of the Data Quality Plan, Security Plan and Privacy Plan;
- f Inform the HMIS Lead Agency when critical deadlines regarding data entry are missed; and

- g Maintain communication with the HMIS Lead Agency and HMIS Committee regarding HMIS data entry challenges and questions.

6. HMIS Software System Vendor

The HMIS Software System Provider licenses and manages the HMIS software used by the CoC by contract. The CoC also requires the HMIS Software System Provider to:

- a Support the HMIS Lead Agency in providing training and technical assistance to the HMIS Lead Agency, CHO HMIS Administrators and End Users;
- b Encrypt data at the server level;
- c Revise HMIS Software System Provider software at the HMIS Lead Agency's request in order to comply with HUD HMIS Standards; and
- d Coordinate with the HMIS Lead Agency to add and remove End Users.

7. End User

- a Complete a classroom or on-site training with the HMIS Lead Agency and CHO HMIS Administrator, as required by the HMIS Lead Agency;
- b Maintain security of login and work station;
- c Follow data entry standards as required in the Data Quality Plan regarding completeness and timeliness;
- d Follow protocols as required by the Security Plan and Privacy Plan;
- e Ensure that paper documentation or physical files are complete;
- f Notify CHO HMIS Administrator if deadlines appear to be in jeopardy; and
- g. Notify CHO HMIS Administrator with any questions, or if the HMIS Software System is not working properly.

Appendix D. Sample RFP

SSC HMIS RFP:

Attach SSC HMIS RFP Additional Forms here

Appendix E. Resources

Regulations and Requirements

HEARTH Act of 2009, S. 896 (<https://www.hudexchange.info/resource/1715/mckinney-vento-homeless-assistance-act-amended-by-hearth-act-of-2009/>)

CoC Program Interim Rule, 25 CFR Part 578
(<https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>)

HMIS Requirements Proposed Rule, 76 FR 22 76917
(<https://www.hudexchange.info/resource/1967/hearth-proposed-rule-for-hmis-requirements/>)

2014 HMIS Data Standards

HMIS Data Standards Manual, U.S. Dept. of Housing and Urban Development
(<https://www.hudexchange.info/resource/3826/hmis-data-standards-manual/>)

HMIS Data Dictionary, U.S. Dept. of Housing and Urban Development
(<https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>)

Guides and Tools

2014 HMIS Data Standards Mapping, U.S. Dept. of Housing and Urban Development
(<https://www.hudexchange.info/resource/4052/2014-hmis-data-standards-mapping/>)

HMIS Project Descriptor Data Elements Manual, U.S. Dept. of Housing and Urban Development
(<https://www.hudexchange.info/resource/4055/hmis-project-descriptor-data-elements-manual/>)