THREE COUNTY CONTINUUM OF CARE

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) GOVERNANCE CHARTER

Membership approved, September 23rd, 2021

Purpose

The Three County Continuum of Care (CoC) operates a Homeless Management Information System (HMIS) to record and store client-level information about the number, characteristics, and needs of persons who receive homelessness prevention, housing, and supportive services from organizations within the CoC, as required by the U.S. Department of Housing and Urban Development (HUD).

The HMIS provides opportunities to improve access to and delivery of services for people experiencing homelessness, and to strengthen community planning and resource allocation. It is also used to gather and aggregate data on homelessness at the local level to accurately describe the scope and the effectiveness of our efforts to end homelessness.

The Three County CoC follows a "CoC Lead Agency Governance Model" with support from the Data Evaluation Committee.

CoC Responsibilities

- Designate a single information system as the official HMIS software for the geographic area.
- Designate a HMIS lead.
- Provide governance of the HMIS Lead, including the requirement that the HMIS Lead enter into written HMIS Participation Agreements with each contributing HMIS organization and require the organization to comply with federal and state regulations regarding HMIS.
- Act as and fulfill all responsibilities of the HMIS Lead as described in this document
- Review, revise and approve the policies and plans required by federal regulations such as those described in the HMIS Proposed Rule.

Designation of HMIS

Community Action Pioneer Valley, as the Collaborative Applicant, has contracted with Bitfocus, Inc. to create an implementation of Clarity Human Services. The CoC designates **the CAPV Clarity HMIS, an implementation of Clarity Human Services provided by Bitfocus, Inc.,** as the HMIS for the Three County CoC.

Clarity Human Services includes standard HMIS data entry templates, standard HUD demographics and optional additional demographics, , the ability to customize data collection screens, a built-in By Names List called the Community Queue with multiple customizable prioritizations, and customized outcome tracking as well as access to Looker, a product dedicated to customized reporting and analysis.

Responsibilities and Duties of the HMIS Lead

The Three County CoC designates Community Action Pioneer Valley as the HMIS Lead to operate the Three County CoC HMIS.

Responsibilities and duties of the HMIS Lead:

- Serve as HMIS System Administrator;
- Contract with the HMIS vendor and ensure that the HMIS meets HUD technical and reporting standards;
- Develop written HMIS policies and procedures in accordance with HUD and ensure all CoC providers receive and understand the policies and procedures;
- Provide the HMIS platform to CoC providers and execute provider participation agreements which include the obligations and authority of the HMIS Lead and CoC providers;
- Monitor data quality and take any necessary actions to maintain input of high-quality data from CoC providers;
- Ensure consistent participation by CoC providers and Emergency Solutions Grants (ESG) program providers, including oversight of HMIS and any necessary corrective action to ensure that the HMIS is in compliance with federal requirements;
- Conduct CoC-wide Site Manager meetings;
- Serve as HMIS Grant Administrator and contract with HUD to receive HMIS funds as the HMIS grant recipient;
- Generate HUD required CoC reporting;
- Provide Custom reports and data analysis to evaluate CoC performance and identify areas of improvement and need;
- Develop custom reports as requested and necessary by CoC Board or CoC members;
- Provide technical HMIS assistance to CoC providers;
- Provide CoC training on HMIS use, information security, , and client confidentiality;
- Review and/or update, CoC documents and policies at least annually and submit to the CoC Board and membership for approval. This includes but is not limited to:
    a. Privacy & Security plan
    b. HMIS Charter
    c. Data Quality plan

>Commitment to Equity

The Three County CoC and the HMIS Lead both share a commitment to promoting equity in our responses to homelessness in Berkshire, Hampshire, and Franklin counties. While we are centering racial equity in our work due to the significant need we see in our data, we are committed to ensuring equity among all overrepresented and marginalized people including members of the LGBTQ+ community, people with disabilities, trauma survivors, people using substances, and persons of all genders. To that end, HMIS data will be analyzed at least yearly with a goal of determining where disparities exist in our CoC. The HMIS Lead will look for overrepresentations of people experiencing homelessness by race and ethnicity when compared to the general population in the Three County area as well as look at performance measures by certain demographic features to determine if people of certain populations achieve positive outcomes at higher rates than others. This type of disparities analysis will be conducted at the CoC level as well as the individual project level to identify areas for improvement. In addition to analyzing data for disparities, the HMIS Lead will coordinate with the CoC to support the Racial Equity Plan and provide training and scripting on how to gather data about race, ethnicity, and gender in culturally responsive and affirming ways. This list is non-exhaustive as new and better strategies to address inequities using data and HMIS may arise.

Stipulations Regarding HMIS Implementation Responsibilities

>HMIS Grant Award & Match

The Three County CoC prepares and submits the HMIS project grant application as part of the consolidated application process and ensures that funds awarded are drawn down and used appropriately. The CoC also ensures that sufficient Match is available for this grant fund. As a project without leasing, this amounts to 25% of the total amount requested; Project Assistance funding and Project Administration funding combined. The CoC secures Match for the HMIS grant through an annual charge to each CoC funded sub-recipient participating in HMIS based on the percentage of the total grant award each sub-recipient receives. More information on the HMIS Match can be found later in this document under Responsibilities of Participating Organizations.

>Data Quality

The Data & Evaluation Manager, on behalf of the CoC, regularly monitors HMIS data quality to assure that HUD standards are met, and that reports can be generated for the CoC and its stakeholders which clearly lay out areas for improvement, if necessary. Monitoring consists of quarterly data quality reporting coupled with direct communication, intervention, and follow up with each provider as needed. Overall data quality should meet current HUD and CoC standards as defined in the CoCs Data Quality Plan.

>Unduplicated Count

The Data & Evaluation Manager, on behalf of the CoC, submits an unduplicated count of clients served at least once annually or upon request from HUD. The unduplicated count must be premised on accurate program entry and exit dates. The CoCs methodology in assuring accurate program entry/exit dates is outlined in the CoCs Data Quality Plan.

>Reporting

The Data & Evaluation Manager submits reports to the CoC and HUD as required, including CoC and Subrecipient APRs, LSA reports, Systems Performance Measures, Point in Time Count HMIS reports, Housing Inventory Count HMIS reports, and CoC Program Application reports.

>Coordinated Entry and Assessment

Successful development and implementation of the CoCs Coordinated Entry System will rely upon effective use of the HMIS, including: integration of screening and assessment processes into HMIS data collection processes; effective use of HMIS data elements and report functionality to augment screening and assessment processes (e.g. using customized queries at regular intervals to identify candidates for housing, based upon eligibility criteria); and cross agency and cross-program referrals using Clarity's referral functionality or similar electronic processes. Towards this end, the Data & Evaluation Manager must participate in local and regional planning processes related to the Coordinated Entry System and provide technical assistance when necessary.

>Data Integration

The Data & Evaluation Manager, on behalf of the CoC, imports data in a timely and accurate manner to the Three County CoC's Green River Data Warehouse from the state's MAHMIS ETO ASIST, Soldier On's Caseworthy, and the City of Springfield's ETO Enterprise. Only Three County CoC data is pulled from these three systems and imported to both the Data Warehouse. Data from the MAHMIS ETO ASIST system which is not collected in the CAPV Clarity HMIS, specifically Massachusetts Emergency Assistance family shelter data, and Three County CoC data from Soldier On's Caseworthy HMIS are imported into the CAPV Clarity HMIS in order to accurately report on our CoC's status and performance from the CAPV Clarity HMIS.

Responsibilities of the CoC Board of Directors

The CoC Board of Directors provides fiscal oversight of the CoCs HMIS project to ensure accountability. It acts upon recommendations made by the CoC Data Evaluation Committee, e.g. regarding project activities so that they best meet CoC goals and objectives.

Responsibilities and duties of the Board of Directors relevant to the HMIS are outlined in Table

1.

Responsibilities of the CoC Data Evaluation Committee

The CoC Data Evaluation Committee works with the HMIS Lead/CoC to monitor and review the HMIS project as well as monitor and review CoC projects and systems outcomes. The Committee reviews and forwards approved documents, policies, procedures and the like to the CoC Board for final approval. The Committee, in collaboration with the HMIS Lead, is responsible for preparing annual progress reports to track the CoCs progress toward reducing and ending homelessness. The Data Evaluation Committee is also responsible for providing feedback about CoC and community level reporting, helping to revise HMIS policies, governance, and charter, and ensuring the rights and privacy of clients are protected. CoC committees, including the Data Evaluation Committee, may act on behalf the Three County CoC as specified in this document. Responsibilities and duties of the Committee are outlined in Table 1.

Responsibilities of the CoC Membership

The membership of the CoC is defined as those persons and organizations attending committee meetings or workgroups and/or is a member of the Western Massachusetts Network to End Homelessness. The CoC Membership is responsible for reviewing changes to HMIS policies and approving changes to the HMIS Charter (this document) and participates in CoC committees, including the Data Evaluation Committee, as needed. Responsibilities and duties of the CoC Membership relevant to the HMIS are outlined in Table 1.

Table 1.	Roles and Responsibilities Of the HMIS Entities	
Entity	**Role**	**Responsibilities**
HMIS Lead (Community	Administration,	➤ Serve as HMIS System Administrator
		➤ Contract with the HMIS vendor and assures that the HMIS meets HUD technical and reporting standards
		➤ Provide the HMIS platform to CoC Providers and execute provider participation agreements
		➤ Conduct CoC-wide Site Manager meetings

Action Pioneer Valley)	TA, and Reporting	➤ Serve as HMIS Grant Administrator and contract with HUD to receive HMIS funds as the HMIS grant recipient
		➤ HUD required CoC reporting
		➤ Custom reporting and data analysis to evaluate CoC performance and identify areas of improvement, with a specific focus on equity and racial equity in particular.
		➤ Custom reporting as requested by community
		➤ Technical HMIS assistance for providers

		➤ Review, update, and maintain data collection, reporting, and privacy policies at least annually and submit to the CoC Board and membership for approval. This includes but is not limited to:
		  a. HMIS Privacy & Security plan
		  b. HMIS Charter
		  c. Data quality plan

CoC Data Evaluation Committee	Monitoring and Review	➤ Support the Data and Evaluation processes of the CoC, making sure that HUD-required deliverables are received as needed and on time, including and not limited to:
		  a) The sheltered Point-In-Time Count report (PIT)
		  b) The Housing Inventory Count (HIC)
		  c) Longitudinal Systems Analysis (LSA)
		  d) The HMIS Annual Performance Report
		  e) The HMIS Renewal Project Application

		➢ Annually review, make recommendations, and help revise if necessary data collection, reporting, and privacy policies. This includes but is not limited to a privacy plan, a data security plan, HMIS Charter, and a data quality plan, required by HUD for implementation within 6 months of the published HMIS Final Rule.

		➢ In collaboration with the HMIS Lead, establish performance measures and targets to track the CoCs progress toward reducing and ending homelessness, in consultation with CoC providers. Possible tracking strategies include annual progress reports including but not limited to the following areas:
		  a) HMIS project outcomes
		  b) Provider participation and bed coverage
		  c) CoC system outcomes
		  d) CoC project outcomes
		  e) Equity and overrepresented populations

		➢ Monitor performance, evaluate outcomes, and make recommendations to the Board regarding actions to be taken to elevate poorly performing programs
		➢ Assure sustainability of the HMIS project by continually seeking new and diversified funding sources ➢ Support and protect the rights and privacy of clients
CoC Membership	Final Approval	➢ Provides final approval on changes to the HMIS Charter (this document)
CoC Board	Oversight and Final Approval	➢ Provides feedback regarding the HMIS renewal project submission to HUD

➢ Provide final approval on changes to the Data Quality, Privacy, and Data Security plans

➢ Provides fiscal oversight: Reviews HMIS activities and costs at least annually to assure that all activities and costs are eligible as defined by HUD (Attachment 1)

➢ Provides project oversight: Reviews HMIS project outcomes at least annually to assure that efforts are aligned with desired CoC outcomes

Stipulations Regarding HMIS Oversight Responsibilities

>HMIS Policies and Procedures

The HMIS Data Evaluation Committee must review written policies and procedures for the operation of the HMIS that apply to the CoC and its organizations participating in HMIS. These policies and procedures will be sent by the Collaborative Applicant to the Data & Evaluation Committee and must be approved by the CoC Board after review by the D&E Committee. They must be implemented within 6 months after the publication of the HMIS Final Rule and must comply with all applicable Federal law and regulations, and applicable state or local governmental requirements. The HMIS Lead, Collaborative Applicant, and the Data Evaluation Committee may not establish standards for any organization that contradicts, undermines, or interferes with the implementation of the HMIS standards as prescribed by HUD in the HMIS Data and Technical Standards.

>Privacy and Security

The CoC, through the Collaborative Applicant, must develop a privacy policy which may include: data collection limitations; purpose and use limitations; allowable uses and disclosures; accountability standards; protections for victims of domestic violence, dating violence, sexual assault, and stalking; and such additional information as may be established by HUD in applicable notices. The CoC may also develop a Data Release Authorization policy to designate when, how, and what type of information can be shared.

Every organization with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this charter as well as the Privacy & Security Plan and Data Quality Plan, including enforcement of sanctions for noncompliance. In addition, every participating organization must comply with the MA Privacy Law: **201 CMR 17.00: Standards For The Protection Of Personal Information Of**

Residents Of The Commonwealth which includes but is not limited to the development of a written information security program ("WISP"); the designation of one or more employees to supervise the implementation of the WISP; regular ongoing employee training; and procedures for monitoring employee compliance.

Responsibilities of Participating Organizations

All organizations participating in the Three County CoC HMIS must comply with federal regulations regarding HMIS. All participating organizations must comply with federal, state, and local laws that require additional privacy or confidentiality and must participate in an annual security and privacy training provided by the HMIS Lead or their internal IT staff. In addition, organizations participating in the Three County HMIS must adhere to responsibilities as specified in the signed participation agreement with the Three County CoC.

>HMIS Grant Match

All participating organizations which are also CoC Funded Project recipients must pay a portion of the 25% HMIS grant match annually as part of their contracted obligations. The amount each sub-recipient pays is based on the percentage of the total grant award that they receive. Organizations with CoC Funded Projects are responsible for paying the HMIS Match within 30 days of receiving a signed contract for their grant. CoC funds cannot be match for another CoC grant, so CoC Grant funds cannot be used to pay this fee and funds used to pay this fee cannot be used as match for any CoC grant funds.

Attachment 1 - HMIS Eligible Activities

HMIS Eligible Activities

The HMIS Lead will use the HMIS Project to carry out the following activities:

1. Host and maintain HMIS software or data;
2. Backup, recovery, and repair of the HMIS software or data;
3. Upgrade, customize, and enhance the HMIS;
4. Integrate and warehouse data, including development of a data warehouse for use in aggregating data from sub-recipients using multiple software systems;
5. System administration;
6. Report to providers, the Continuum, and HUD;
7. Conduct training for recipients on the use of the system, including the reasonable cost of travel to the training; and
8. Such additional activities as may be authorized by HUD in HUD's HMIS Proposed Rule.

The HMIS Lead may fund personnel costs associated with FTEs used for (1) HMIS project management and coordination; (2) Data analysis; (3) Programming; (4) Technical assistance and training; and (5) HMIS project support staff.

The HMIS Lead may pay for the space and operations necessary to support the HMIS and HMIS project staff, such as office space, central server space, electricity, and other operational costs.

Adapted from §580.23 the HMIS Proposed Rule (2013) and from HUD's Homeless Management Information Systems Budgeting and Staffing Toolkit (2011)