

Mahoning County Homeless Continuum of Care

**Homeless
Management
Information System
(HMIS) Governance
Charter**

Prepared August 2016

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Mahoning County Homeless Continuum of Care Homeless Management Information System Governance Charter

1. Purpose

The Mahoning County Homeless Continuum of Care (MCHCoC) utilizes a Homeless Management Information System (HMIS) to record and store client-level data including the numbers, characteristics and needs of persons utilizing shelter, housing assistance, and supportive services. This Governance Charter outlines how that HMIS will be managed, the responsible parties, and all other relevant items as required by the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care Program.

2. MCHCoC Responsibilities

The MCHCoC is responsible for:

- Designating a software product as the official HMIS product for the geographic area.
- Designating an HMIS Lead to operate the HMIS.
- Providing for governance of the HMIS Lead, including:
 - The requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Participating Agency (PA) requiring the PA to comply with the federal regulations regarding HMIS and imposing sanctions for failure to comply; and the Participation fee charged by the HMIS;
- Maintaining documentation of compliance with the entirety of the HMIS Governance Charter; and
- Reviewing, revising and approving the policies and plans required by federal regulation.

To meet these responsibilities, the MCHCoC relies on the leadership of the Executive Board. For more information on the MCHCoC Executive Board, see the [Mahoning County Homeless Continuum of Care Governance Charter](#).

3. Designations

3.1 HMIS Product

The MCHCoC designates the implementation of ServicePoint by Bowman Systems, as the official HMIS for the MCHCoC's geographic area.

3.2 HMIS Lead

The MCHCoC designates Catholic Charities Regional Agency (CCRA) as the HMIS Lead for the MCHCoC HMIS. CCRA in turn, contracts with the Coalition on Homelessness and Housing in Ohio (COHHIO) to administer and operate the HMIS.

4. Responsibilities and Duties of the HMIS Lead

The HMIS Lead is responsible for:

- Ensuring the operation of and consistent participation by recipients of Continuum of Care funds, Emergency Solutions Grants (ESG), Ohio Housing Trust Fund, state program funds, and other participating agencies housing the homeless in HMIS;

- Oversight of the HMIS and any necessary corrective action to ensure that the providers comply with federal requirements of HMIS;
- Submitting, at least once annually, or upon request from HUD, to the MCHCoC an unduplicated count of clients served and an analysis of unduplicated counts. This may be done as part of the annual Point-in-Time Count process;
- Executing a written HMIS Participation Agreement with each Participating Agency (PA), which includes the obligations and authority of the HMIS Lead and PA; the requirements of the security plan and privacy policy with which the PA must abide; sanctions for violations; and an agreement that the HMIS Lead and the PA will process Personally Identifying Information (PII) consistent with the agreement;
- Serving as the grantee for CoC grant funds to be used for HMIS activities for the MCHCoC, and entering into grant agreements with HUD to carry out HUD-approved HMIS activities;
- Monitoring and enforcing compliance by all PAs with HUD HMIS requirements and reporting on compliance to the MCHCoC and HUD;
- Monitoring data quality in accordance with our MCHCoC Data Quality Standards and taking necessary action to maintain input of high-quality data from all PAs;
- Adopting written policies and procedures for the operation of the HMIS that apply to the HMIS Lead, its PAs and the CoC. These policies and procedures must comply with all applicable federal law and regulations, and applicable state governmental requirements. The HMIS Lead may not establish local standards for any PA that contradict, undermine, or interfere with the implementation of the HMIS standards as prescribed in this part. These policies and procedures should be drafted by the HMIS Advisory Committee, which includes HMIS Lead and COHHIO HMIS staff. This document, which includes the HMIS security and privacy plan for the MCHCoC, and Data Quality Standards Document for MCHCoC Executive Board approval, must be reviewed annually and within six months after the date that any change is made to the MCHCoC HMIS. During this process, the HMIS Lead must seek and incorporate feedback from the MCHCoC Executive Board and PAs;
- Developing a privacy policy. At 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. Every organization with access to personally identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including sanctions for non-compliance;
- Outlining participation fees, based on established fees by Bowman Systems, and ensuring that PA's have the ability to purchase the number of licenses necessary to comply with HMIS requirements.

5. Responsibilities of the MCHCoC HMIS Advisory Committee

The MCHCoC HMIS Advisory Committee is comprised of staff from the HMIS Lead Agency, other providers and End Users represented, and the COHHIO HMIS Team, and is responsible for administering and managing the MCHCoC HMIS. The MCHCoC HMIS Advisory Committee will work to:

- Develop, annually review, and as necessary revise for MCHCoC Board approval the MCHCoC HMIS Policies and Procedures, which include privacy and security plans, and a Data Quality Standards document for the HMIS, as well as any other HMIS policies and procedures required by HUD.
- Develop for MCHCoC Executive Board approval and implement a plan for monitoring the HMIS to ensure that:
 - Grantees and subgrantees consistently participate in HMIS, meeting all applicable requirements and standards as outlined by HUD’s Data Standards, the MCHCoC HMIS Policies and Procedures and Data Quality Standards, and any other applicable regulations;
 - HMIS is satisfying the requirements of all regulations and notices issued by HUD;
 - The HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Charter including the obligation to enter into written participation agreements with each PA.
- Oversee and monitor HMIS Data collection and production of the following reports:
 - Annual Point-in-Time count;
 - Housing Inventory Count;
 - Annual Homeless Assessment Report (AHAR); and
 - Annual Performance Reports (APRs).
 - Data Quality Reports

6. Responsibilities of the Participating Agencies

A PA must comply with federal regulations regarding HMIS.

A PA 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 PA must adhere, the PA must contact the HMIS Lead and collaboratively update the applicable policies for the PA to accurately reflect the additional protections.

7. Joint HMIS Lead-PA Responsibility for Privacy

The HMIS Lead and PA using the HMIS are jointly responsible for ensuring that HMIS processing capabilities remain consistent with the privacy obligations of the PA.