
COMMISSION
ON
HOMELESSNESS
FOR VOLUSIA &
FLAGLER
COUNTIES

HOMELESS
MANAGEMENT
INFORMATION SYSTEM
(HMIS) GOVERNANCE
CHARTER

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1. Purpose

The Commission on Homelessness for Volusia & Flagler Counties (CoH) will designate the HMIS Lead Agency to operate the 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 supportive services and for persons who receive homeless prevention assistance.

HMIS is used 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 and education.

2. Commission on Homelessness for Volusia and Flagler Counties Responsibilities

The CoH is responsible for:

- Designating a single information system as the official HMIS software 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 (Agency) requiring the Agency to comply with federal regulations regarding HMIS and imposing sanctions for failure to comply; and
 - The participation fee, if any, charged by the HMIS Lead Agency;
- Maintaining documentation evidencing compliance with this part and with the governance charter; and
- Reviewing, revising and approving the policies and plans required by federal regulation.
- Will share the responsibilities in soliciting new Agencies to participate in HMIS with the HMIS Lead Agency.

3. Designations

3.1. HMIS System

The CoH designates a software provider as the official HMIS for the CoH geographic area.

3.2. HMIS Lead Agency

(a) The CoH will select an agency to serve as the official HMIS Lead Agency for the CoH geographic area.

4. Responsibilities of the HMIS Lead

The HMIS Lead is responsible for:

- Ensuring the operation of and consistent participation by recipients of, state and local funding, including oversight of the HMIS and any necessary corrective action to ensure that the HMIS complies with federal requirements;
- Developing written HMIS policies and procedures in accordance with §580.31 for all Agencies;
- Executing a written HMIS Participation Agreement with each Agency, which includes the obligations and authority of the HMIS Lead and Agency, the requirements of the security plan and privacy policy with which the Agency must abide, sanctions for violating the HMIS Participation Agreement, and an agreement that the HMIS Lead and the Agency will process Protected Identifying Information consistent with the agreement;
- Serving as the applicant to the US Department of Housing and Urban Development (HUD) for CoC grant funds to be used for HMIS activities for the CoC's geographic area, as directed by the CoH, and entering into grant agreements with HUD to carry out the HUD-approved HMIS activities;
- Monitoring and enforcing compliance by all Agencies with HUD requirements and reporting on compliance to the CoC and HUD;
- Monitoring data quality and taking necessary actions to maintain input of high-quality data from all Agencies;
- Submitting a security plan, an updated data quality plan, and a privacy policy to the CoC for approval within six months after the effective date of the HUD final rule establishing the requirements of these plans, and within 6 months after the date that any change is made to the local HMIS. The HMIS Lead must review and update the plans and policy at least annually. During this process, the HMIS Lead must seek and incorporate feedback from the CoC and Agency. The HMIS Lead must implement the plans and policy within six months of the date of approval by the CoH.
- Will share the responsibilities in soliciting new Agencies to participate in HMIS with the CoH.

5. Duties of the HMIS Lead

5.1. CoH HMIS Policies and Procedures

The HMIS Lead must adopt written policies and procedures for the operation of the HMIS that apply to the HMIS Lead, its Agencies, and the Commission on Homelessness. These policies and procedures must comply with all applicable Federal law and regulations, and applicable State or local governmental requirements. The HMIS Lead may not

establish local standards for any Agency that contradicts, undermines, or interferes with the implementation of the HMIS standards as prescribed in this part.

5.2. Unduplicated Count

The HMIS Lead must, at least once annually, or upon request from HUD, submit to the CoH an unduplicated count of clients served and an analysis of unduplicated counts, when requested by HUD.

5.3. Reporting

The HMIS Lead shall submit reports to HUD and CoH as required.

5.4. Privacy

The HMIS Lead must develop a privacy policy. 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. Every Agency with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including enforcement of sanctions for noncompliance.

5.5. HMIS Standards

The HMIS Lead will communicate any changes in HMIS standards and associated software updates to the agencies in a timely manner.

5.6. Participation Fees

The HMIS Lead may charge reasonable participation fees for Agency to help cover the costs of software licenses and fees, training, reporting, and HMIS operations. Allowable participation fees will be determined by the HMIS Committee in consultation with the HMIS Lead and will be approved by the CoH Board.

6. Responsibilities of the COH HMIS Committee

The HMIS Committee will work with the HMIS Lead to:

- Develop, review, and, as necessary, revise for Board approval a privacy plan, security plan, and data quality plan for the HMIS, as well as any other HMIS policies and procedures required by HUD.
- Develop for Board approval and implement a plan for monitoring the HMIS to

- ensure that:
 - Agencies consistently participate in HMIS;
 - 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 and Agreement with the CoH, including the obligation to enter into written participation agreements with each Agency.
 - Oversee the timeliness of:
 - Sheltered point-in-time count;
 - Housing Inventory Chart;
 - Annual Homeless Assessment Report (AHAR); and
 - Annual Performance Reports (APRs).

7. Responsibilities of the Agency

An Agency must comply with federal regulations regarding HMIS.

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

All agencies receiving federal local, or state funds for housing programs, must agree to input data into the HMIS database and participate in funding the operations of the HMIS database.

8. Joint HMIS Lead Agency Responsibility for Privacy

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

This document was reviewed and updated on February 24, 2017 by the full Board of directors of the Commission on Homelessness for Volusia & Flagler Counties.

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