HMIS GOVERNANCE CHARTER OF THE BROWARD HOMELESS CONTINUUM OF CARE FL-601

Approved by the CoC Board on: October 7th, 2015

Version 1.1
PURPOSE
The purpose of this document is to serve as the governance charter for oversight of the Homeless Management Information System (“HMIS”) for Broward County Homeless Continuum of Care FL-601 (Broward CoC). This charter is designed to provide a framework for the CoC HMIS implementation and delineate the roles and responsibilities related to key aspects of the governance and operations of the Broward CoC’s HMIS.

The Broward CoC operates the HMIS to record and store client-level information with regard to numbers, characteristics and needs of persons who use shelter, housing, supportive services, person(s) at risk of homelessness, and those experiencing homelessness within Broward County. 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 assist the Broward CoC to measure the effectiveness of homeless assistance projects and programs.

BACKGROUND
HMIS is a secure, shared homeless and non-homeless client level database in Broward County, FL. The HMIS Lead Agency through the HMIS Data Committee focuses on recruiting members who provide shelter and other related services including basic needs and case management. A Contributing HMIS Organization (“CHO”) also commonly referred to as a Covered Homeless Organization that enters and manages their client level data in HMIS. This data is critical to CHOs as they assist the client in navigating and exiting the social service system and the Broward CoC as it is responsible for tracking and reporting programmatic and system level data and outcomes.

The use of HMIS is mandated by the U.S. Department of Housing and Urban Development (HUD) for projects funded by the Continuum of Care (CoC) Program, Emergency Solutions Grant (ESG) Program, and Housing Opportunities for Persons with AIDS (HOPWA) Program, as well as by the U.S. Department of Veterans Affairs (VA) for projects funded by the Supportive Services for Veteran Families (SSVF) Program, and by the U.S. Department of Health & Human Services (HHS) for projects funded by the Runaway & Homeless Youth (RHY) and Projects for Assistance in Transition from Homelessness (PATH) Programs, or as required by federal, state or local government entities. In an effort to effectively coordinate homeless services, federal, state and local governments strongly encourage all homeless projects to participate in a CoC’s HMIS.

DESIGNATIONS
The Broward CoC FL-601:

1. Designates Broward County through its Community Partnership Division (CPD) as the HMIS Lead Agency. In August 2012, the Homeless Initiative Partnership (HIP) Advisory Board in its capacity as the Primary Decision Making Body of the Broward CoC reaffirmed Broward County as the CoC’s HMIS Lead Agency. The Broward Board of County Commissioners approved new
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HMIS End User, Privacy, Security and Data Standard Plans for Contributing Homeless Organizations on November 05, 2013.

2. Designates the ServicePoint software operated by Bowman System as the official HMIS vendor.

DURATION

This charter may be amended at any time, but it will minimally be updated and/or renewed annually. Annual renewal is intended to ensure continued consistency and compliance with HUD regulations. The review is undertaken by the HMIS Data Committee and any updates have to be approved by the CoC Board.

RESPONSIBILITIES

The Broward CoC Collaborative Applicant, HMIS Lead Agency, CHOs, and the HMIS Data Committee responsibilities are discussed below.

The Broward CoC Collaborative Applicant shall:

1. Oversee the implementation and operation of the HMIS. CPD that oversees HIP, will ensure the consistent participation in HMIS of all Broward CoC funded projects;
2. Monitor the performance of the HMIS Lead Agency, including ensuring HMIS is administered in accordance with requirements prescribed by federal law or regulation and the CoC;
3. Review on an annual basis the HMIS needs of the Continuum of Care and approve any substantial changes to the HMIS system;
4. Review, revise, and approve all policies and procedures that must be developed by the HMIS Lead Agency, including: data quality, privacy, and security plans;
5. The Broward CoC shall carry out its responsibilities through the work of Broward County Homeless Initiative Partnership staff, with input from the Broward CoC Advisory Board and the HMIS Data Committee;
6. Define the annual participation fee per HMIS End User; and
7. The Broward CoC, which is the HMIS Grantee, has adopted a drug free workplace policy.

The HMIS Lead Agency shall:

Ensure the operation of and consistent participation by recipients of funds from the Continuum of Care Program, Emergency Solutions Grants Program, Supportive Services for Veteran Families (SSVF), Broward County Homeless Fund, U.S. Department of Health & Human Services (HHS) for projects funded by the Runaway & Homeless Youth (RHY) and Projects for Assistance in Transition from Homelessness (PATH) Programs and from the other programs authorized by Title IV of the McKinney-Vento Act or as required by federal, state or local government entities.
Duties include:
1. Establishing the HMIS including the selection of the HMIS vendor(s) following established procurement procedures;
2. Conducting oversight of the HMIS;
3. Taking corrective action, if needed, to ensure that HMIS is compliant with all HUD standards;
4. Making recommendations for changes to the HMIS in order to better support the data reporting needs and requirements of the Broward CoC and the HMIS participating agencies;
5. Adopting written policies and procedures for the operation of the HMIS that apply to the HMIS Lead, the HMIS Participating Agencies, and the Broward CoC;
6. At least once annually, or as required by HUD, submit to the Broward CoC an unduplicated count of clients served and an analysis of the unduplicated counts;
7. Submitting reports to HUD as required;
8. Developing a privacy policy that, at a minimum, includes: 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 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;
9. Requiring the HMIS vendor and software to comply with HMIS standards issued by HUD as part of its contract;
10. Staff at least one local System Administrator and assure that each CHO has identified as an Agency Administrator. The System Administrator(s) will:
   a. Train local users on HUD and other prescribed workflows;
   b. Support data organization and completion of Provider Pages for participating agencies;
   c. Assign licenses to CHO Administrators and/or users;
   d. Host local HMIS operations meeting(s) and assure that CHO Administrators are attending the local User Meetings;
   e. Assure that all users are trained in privacy, security and system operation;
   f. Participate in HUD mandated measurement including Point-in-Time (PIT), Housing Inventory Count (HIC), Annual Performance Reports (APRs), Consolidated Annual Performance and Evaluation Report (CAPER) and the Annual Homeless Assessment Report (AHAR) as appropriate;
   g. Participating in the annual count process and support publication of local reports; and
   h. Support the CoC’s Continuous Data Quality Improvement efforts.
11. Require each HMIS participating agency to enter into a CHO End User License Agreement with Broward County; which includes:
    a. Obligations and authority of HMIS Lead Agency and each CHO;
b. Requirements of the security plan with which each HMIS participating agency must abide;
c. Requirements of the privacy policy with which each HMIS participating agency must abide;
d. Sanctions for violating the CHO End User License Agreement; and
e. Agreement that HMIS Lead Agency and HMIS participating agencies will process Protected Identifying Information consistent with the agreement;

12. Serve as the applicant to HUD for HMIS grant funds to be used for HMIS activities for the Broward CoC, as approved by the Broward Board of County Commissioners and/or Collaborative Applicant, and enter into a grant agreement with County to carry out the HUD-approved activities;

13. Monitor and enforce compliance by all HMIS participating agencies with all HUD requirements and report on compliance to the Broward Continuum of Care, Collaborative Applicant and HUD;

14. Monitor data quality and take necessary actions to maintain input of high-quality data from all HMIS Participating agencies;

15. Regularly run and disseminates data quality reports to participating programs that indicate level of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards;

16. Submit a security plan, a data quality plan, and a privacy policy to the Broward Continuum of Care Collaborative Applicant and HMIS Data Committee for approval within 6 months of the effective date of the HMIS final rule and within 6 months after the date that any change is made to the local HMIS. The HMIS Lead Agency must review and update the plans and policy at least annually. During this process, the HMIS Lead Agency must seek and incorporate feedback from the Broward Continuum of Care, Collaborative Applicant and from the HMIS participating agencies. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Broward Continuum of Care Collaborative Applicant; and

17. Maintains a current and accurate organization chart that clearly identifies all team members, roles and responsibilities, and general work functions;

The Contributing HMIS Organizations (CHOs) shall:

1. Comply with all applicable laws and regulations, which shall include but not be limited to the U.S. Department of Housing and Urban Development’s (“HUD”) HMIS regulations as found in:
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d. Any subsequent revisions to either notice.

2. Comply with the terms of the CHO End User License Agreement;

3. Comply with all policies and procedures that are developed by the HMIS Lead Agency, including: data quality, privacy, and security plans;

4. Participate in the Broward CoC Data Quality Monitoring efforts by implementing internal processes to reduce the percentage of client records containing null, don’t know, and refused values and to ensure valid program entry and exit dates are entered into HMIS in a timely fashion;

5. Monitor program and agency level participation in HMIS via comparison of point-in-time census beds versus client served and report findings to Broward CoC on a quarterly basis;

6. Ensures and maintains written inter-agency agreements with other participating agencies who share client level data; and

7. Provide to the HMIS Lead End User feedback that includes impressions of operational milestones and progress, system functionality, and general HMIS operations.

The HMIS Data Committee shall:

1. Annually review, and, as necessary, provide input for Broward CoC / Collaborative Applicant approval of a privacy plan, security plan, and data quality plan for HMIS, as well as any other HMIS policies and procedures required by HUD.

2. Review Broward CoC HMIS Lead Agency’s plan for monitoring HMIS to ensure that:
   a. All HMIS Participating Agencies consistently participate in HMIS;
   b. HMIS is satisfying the requirements of all regulations and notices issued by HUD; and
   c. The HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Charter and Agreement with the Broward CoC / Collaborative Applicant, including the obligation to enter into written participation agreements with each CHO.

3. Review HMIS production of the following reports and other report(s) as required by federal, state and local government funders:
   a. PIT;
   b. HIC;
   c. AHAR;
   d. APRs;
   e. CAPER; and
   f. Data Quality Monitoring Reports.

4. Shall meet at a minimum once every quarter.
Appendix A

HMIS Governance Definitions

Annual Homeless Assessment Report (AHAR) – A report to the U.S. Congress on the extent and nature of homelessness in America. The report is prepared by the Department of Housing and Urban Development (HUD) and provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The report is based primarily on Homeless Management Information Systems (HMIS) data about persons who experience homelessness during a 12-month period.

Annual Performance Report (APR) – A report that tracks program progress and accomplishments in HUD’s competitive homeless assistance programs. The APR provides the grantee and HUD with information necessary to assess each grantee’s performance.

CHO – Contributing HMIS Organization.

CAPER - Consolidated Annual Performance and Evaluation Report

Continuum of Care (CoC) – A community with a unified plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency. HUD funds many homeless programs and HMIS implementations through Continuums of Care grants.

Data Quality – The accuracy and completeness of all information collected and reported to the HMIS.

Data Standards – See the current HUD HMIS Data Standard.

Emergency Solutions Grant (ESG) – A federal grant program designed to help improve the quality of existing emergency shelters for the homeless, to make available additional shelters, to meet the costs of operating shelters, to provide essential social services to homeless individuals, and to help prevent homelessness.

Housing Inventory Count (HIC) - The Housing Inventory Count collects information about all of the beds and units in each Continuum of Care homeless system.

Homeless Management Information System (HMIS) – Computerized data collection tool designed to capture client-level information over time on the characteristics and service needs of men, women, and children experiencing homelessness.

HMIS Grantee – Broward County Board of County Commissioners.

HMIS Lead Organization – An organization designated to operate the CoC’s HMIS on its behalf.

McKinney-Vento Act – The McKinney-Vento Homeless Assistance Act was signed into law by President Ronald Reagan on July 22, 1987. The McKinney-Vento Act funds numerous programs providing a range of services to homeless people.

NOFA – Notice of Funding Availability (NOFA) establishes the funding criteria for the Continuum of Care (CoC) Programs.

Participating Agency – An agency that uses HMIS to collect data.
**Point-in-Time (PIT)** – A snapshot of the homeless population on a given day. Since 2005 HUD requires all CoC applicants to complete this count annually in the last week of January that provides a count of sheltered and unsheltered homeless persons.

**Unduplicated Count** – The number of people who are homeless within a specified location and time period. An unduplicated count ensures that individuals are counted only once regardless of the number of times they entered or exited the homeless system or the number of programs in which they participated. Congress directed HUD to develop a strategy for data collection on homelessness so that an unduplicated count of the homeless at the local level could be produced.