

Ohio Balance of State Continuum of Care

Homeless Management Information System (HMIS) Governance Charter

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1. Purpose

The Ohio Balance of State Continuum of Care (Ohio BoSCoC) employs 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 (CoC) Program.

2. Ohio BoSCoC Responsibilities

The Ohio BoSCoC 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 Covered Homeless Organization (CHO) requiring the CHO 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 Ohio BoSCoC relies on the leadership of the Board. For more information on the Ohio BoSCoC Board, see the [Ohio Balance of State Continuum of Care Governance Charter](#) .

3. Designations

3.1 HMIS Product

The Ohio BoSCoC designates the implementation of ServicePoint by Mediware, operated by the Coalition on Homelessness and Housing in Ohio (COHHIO), as the official HMIS for the Ohio BoSCoC's geographic area.

3.2 . HMIS Lead

The Ohio BoSCoC designates COHHIO as the HMIS Lead for the Ohio BoSCoC 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 CoC, Emergency Solutions Grants (ESG), Ohio Housing Trust Fund, and state program funds, including oversight of the HMIS and any necessary corrective action to ensure that the HMIS complies with federal requirements;
- Submitting, at least once annually, or upon request from HUD, to the Ohio BoSCoC 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 CHO, which includes the obligations and authority of the HMIS Lead and CHO, the requirements of the security plan and privacy policy with

which the CHO must abide, sanctions for violating the HMIS Participation Agreement, and an agreement that the HMIS Lead and the CHO 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 Ohio BoSCoC, and entering into grant agreements with HUD to carry out HUD-approved HMIS activities;
- Monitoring and enforcing compliance by all CHOs with HUD HMIS requirements and reporting on compliance to the CoC and HUD;
- Monitoring data quality in accordance with our Ohio BoSCoC Data Quality Standards and taking necessary action to maintain input of high-quality data from all CHOs;
- Developing written policies and procedures for the operation of the HMIS that apply to the HMIS Lead, its CHOs 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 CHO 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 Ohio BoSCoC HMIS Management Committee, which includes HMIS Lead and CoC staff. The policies, which include the HMIS security and privacy plan for the Ohio BoSCoC, and Data Quality Standards document, must be approved by the CoC Board, and must be reviewed annually and within six months after the date that any change is made to the Ohio BoSCoC HMIS. During this

process, the HMIS Lead must seek and incorporate feedback from the Ohio BoSCoC Board and CHOs;

- 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 and ensuring that CHOs have the ability to purchase the number of licenses necessary to comply with HMIS requirements.

5. Responsibilities of the Ohio BoSCoC HMIS Management Committee

The Ohio BoSCoC HMIS Ohio BoSCoC HMIS Management Committee is comprised of staff from the HMIS Lead Agency and from the CoC Team, and is responsible for administering and managing the Ohio BoSCoC HMIS. The Ohio BoSCoC HMIS Management Committee will work to:

- Develop, annually review, and as necessary revise for CoC Board approval Ohio BoSCoC 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 CoC Board approval and implement a plan for monitoring the HMIS to ensure that:
 - Grantees and sub grantees consistently participate in HMIS, meeting all applicable requirements and standards as outlined by HUD’s Data Standards, the Ohio BoSCoC 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 CHO.
- 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 CHO

A CHO must comply with federal regulations regarding HMIS.

A CHO 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 CHO must adhere, the CHO must contact the HMIS Lead and collaboratively update the

applicable policies for the CHO to accurately reflect the additional protections.

7. Joint HMIS Lead-CHO Responsibility for Privacy

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