



Continuum of Care 2.0

Continuum of Care Responsibilities: Designating and Operating a Homeless Management Information System (HMIS)



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Welcome to the HUD Broadcast on the Continuum of Care Responsibilities in designating and operating a Homeless Management Information System. In this presentation, we will talk about designating and operating an HMIS, one of the major responsibilities assigned to the CoC in the CoC Program interim rule.

While this broadcast provides a brief introduction on this topic, as always, we encourage you to seek complete information on the CoC Program regulation at 24 CFR 578.

Today's Broadcast will cover...

- Overview of CoC's responsibility related to HMIS
- Specific HMIS-related duties assigned to the CoC
- Role of the CoC versus HMIS lead organization



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You may be confused by that statement – “one of the major responsibilities assigned to the CoC.” Perhaps you’re asking, “Why the CoC? So, then what is the role of the HMIS lead organization?”

That is what we will be tackling in today’s presentation.

We will begin by helping viewers understand the CoC’s responsibility for the HMIS and the intent behind it, then we will briefly discuss the specific HMIS-related duties listed in the CoC Program interim rule. We will close by comparing the role of the CoC with that envisioned for the HMIS lead to help clarify how these two entities can work together to ensure the HMIS is a widely-used, effective tool for managing information on homelessness within each community.

Accountability for HMIS

CoC Program interim rule assigns ultimate responsibility for HMIS to the CoC

- Management of the HMIS is delegated to HMIS lead agency
- CoC maintains an oversight role



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As I just stated, the CoC Program interim rule assigns responsibility for the HMIS to the CoC. Establishing and operating an HMIS has been an expectation for communities for a long time, but responsibility for it has been unclear.

The CoC Program interim rule makes clear that the CoC is ultimately responsible for HMIS, and not the agency that gets the grant because the grant is awarded on behalf of the CoC.

Thus the *management* of HMIS is delegated to the HMIS lead agency, but the CoC maintains an oversight role. Let's talk a little more about why the CoC has been given this role.

HMIS Is Important to the CoC

HMIS can help the CoC:

- measure homelessness and how well the system is working to address it
- operate the system, including coordinated assessment
- report to HUD



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Homeless system design, operation and evaluation are the responsibility of the CoC; therefore, it makes sense that the CoC should be ultimately accountable for the HMIS, the system that will support these functions as well.

HMIS data are fundamental to help the CoC understand the extent and nature of homelessness and how well the system is working to address it.

If implemented well, the HMIS should also support the operation of the housing and service system, including the coordinated assessment system.

And of course, the CoC is responsible for reporting HMIS data to HUD to communicate how well the system and its projects are doing.

The CoC Is Important to the HMIS

CoC can help strengthen the HMIS:

- leverage greater provider participation and higher data quality
- reinforce the role of HMIS in supporting other CoC functions
- ensure HMIS policies and procedures are consistent with CoC goals



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By making the CoC accountable for HMIS, the expectation is that CoCs will get more involved in helping to support the strength of the HMIS implementation.

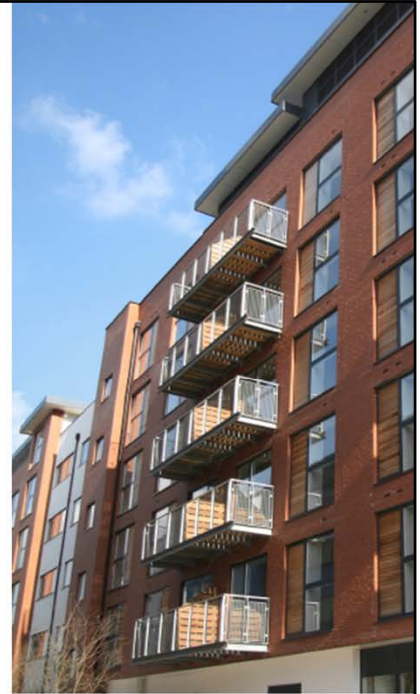
For instance, through its role of setting priorities for CoC Program funding, the CoC may be able to secure stronger participation from providers who are not consistently entering data.

The CoC may be more likely to use the HMIS as the foundation for its other functions, which in turn enhances the HMIS's value and avoids the proliferation of data systems within the CoC.

And finally, as it reviews and approves the HMIS privacy, security, and data quality plans, the CoC may be in a better position to ensure that the HMIS policies are consistent with the CoC's goals and system processes.

CoC Responsibilities for HMIS

- Designate single HMIS system for a geographic area
- Designate HMIS lead to manage HMIS
- Review, revise and approve HMIS privacy, security, and data quality plans
- Ensure HMIS administered in compliance with HUD requirements
- Ensure consistent participation in HMIS of recipients and subrecipients



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Let's summarize the HMIS-related responsibilities that are specifically listed in the CoC Program interim rule for the CoC.

First, the CoC must designate a single HMIS system for the geographic area and a single eligible applicant as the HMIS lead. The HMIS lead is the only applicant eligible to apply for CoC funds under the HMIS program component.

The CoC must review, revise and approve the HMIS privacy plan, security plan, and data quality plan.

It must ensure the HMIS is administered in compliance with HUD requirements, and it must ensure consistent participation in HMIS of all recipients and subrecipients.

Sample Division of Duties

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- Designate HMIS and delegate responsibilities to HMIS lead in governance charter (and related agreements)
- Approve plans, policies and procedures governing the HMIS
- Track and reinforce recipient and subrecipient participation in HMIS



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Before we close today's broadcast, I'd like to review the relative roles of the CoC versus the HMIS lead. The CoC is ultimately responsible for designating the HMIS and the HMIS lead and it is broadly responsible for the HMIS implementation, which encompasses the plans, policies and procedures governing the HMIS, the HMIS Lead, and the contributing HMIS organizations (CHOs).

Sample Division of Duties

HMIS Lead

- Develop plans, policies and procedures for review and approval by the CoC
- Execute participation agreements with every contributing HMIS organization and user agreements with every user
- Provide technical support and training for users



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The role of the HMIS Lead will have to be negotiated with the CoC, but as the custodian of the HMIS implementation, it seems reasonable to imagine that the HMIS lead would be responsible for developing the plans, policies and procedures for review and approval by the CoC. The HMIS lead also executes Participation Agreements with each contributing HMIS organization, ensures that each HMIS user has signed an HMIS User Agreement, manages the system on a day-to-day basis, and provides technical support and training to users.

Written Agreements

- Governance Charter
- Memorandum of Agreement between HMIS Lead and CoC
- HMIS Policies and Procedures



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Because the HMIS is a shared responsibility between the CoC and the HMIS lead, expectations around each entity's role must be clearly documented and agreed to, along with any role envisioned for the CoC board, collaborative applicant, and advisory committees.

Each CoC is required to formalize the designation of the HMIS system and lead agency through a written agreement.

The CoC can make a local determination as to whether all of the details should be outlined within the CoC's written governance charter or whether only general roles are specified in the governance charter, augmented by a separate more detailed memorandum of agreement or other written agreement between the CoC and HMIS lead.

And of course, some expectations may be best documented as part of the HMIS policies and procedures.



You can obtain additional information or assistance by going to [OneCPD Resource Exchange](#) and searching the [Resource Library](#), checking out [Training & Events and News](#), using [Ask a Question](#) or [requesting technical assistance](#)



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Thank you for joining us for this broadcast on the CoC's responsibilities related to HMIS. This broadcast provided information on the CoC's responsibility for the HMIS and the intent behind it, specific HMIS-related duties listed in the CoC Program interim rule and a comparison of the CoC role versus the HMIS leads role.

Please refer to the related training materials on the responsibilities of the Continuum of Care in regard to the HMIS that are provided on the OneCPD Resource Exchange. In the event that you have a specific question, please contact your Field Office or submit a question to the Ask-a-question section of www.oneCPD.info

As a reminder, while this broadcast provides a brief introduction on this topic, as always, we encourage you to seek complete information on the CoC Program regulation at 24 CFR 578.



Thank you.

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