



HMIS Lead Improvement Evaluation Matrix

How to use this HMIS Lead Improvement Evaluation Matrix

Continuums of Care (CoCs) must designate an Homeless Management Information Systems (HMIS) Lead, responsible for managing the HMIS for the CoC's geographic area in accordance with the [CoC Program interim rule](#) (24 CFR Part 578) and any HMIS requirements prescribed by HUD. Additional responsibilities may also be assigned to the HMIS Lead by the CoC through governance charters, memoranda of understanding, or other binding documents such as contracts or statements of work. The assignment of roles and responsibilities to the HMIS Lead by the CoC establishes a baseline for HMIS administration, performance management, and quality service delivery against which the HMIS Lead can be monitored. Without a well-defined agreement that specifies what activities, services, and tasks the HMIS Lead is responsible for completing or providing, HMIS Lead monitoring will at best be a brief and subjective process that only considers past performance without an actionable set of outputs or outcomes to improve future performance. At worst, HMIS Lead monitoring could lead the CoC to misunderstand fundamental limitations of the HMIS implementation and pursue a complex or costly option—such as HMIS Lead transition—without addressing the underlying issues related to funding, capacity, HMIS governance, and other core competencies of HMIS Lead staff.

The CoC will want to identify who will be involved in the HMIS Lead monitoring process from the CoC and HMIS Lead. Keep in mind, for HMIS Leads that are municipal, county, or state governmental entities, the departments of contracts or finance may be involved in monitoring and management, even if they are not included in the day-to-day administration and operation of the HMIS. For HMIS Leads that are nonprofit entities, the finance director, operations director, and other HMIS Lead personnel who understand the performance of the HMIS as well as the financial and legal aspects of contract management may be involved. CoC data leadership should be informed of the monitoring results and action steps, even if they are not participants in the actual monitoring process.

CoCs may choose the **HMIS Lead Improvement Evaluation Matrix** as the basis of their locally developed HMIS Lead monitoring tool, but should clearly define the requirements that are applicable to their own CoC, HMIS implementation, and HMIS Lead. HUD prescribes certain requirements of CoCs and HMIS Leads, but many of the activities, services, and tasks the HMIS Lead is responsible for completing or providing are locally defined. HUD encourages CoCs to use the HMIS Lead Improvement Evaluation Matrix as a monitoring tool after reviewing written agreements, contracts, and statements of work and consulting local requirements and performance standards to which the HMIS Lead is held.

This resource is prepared by technical assistance providers and intended only to provide guidance. The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

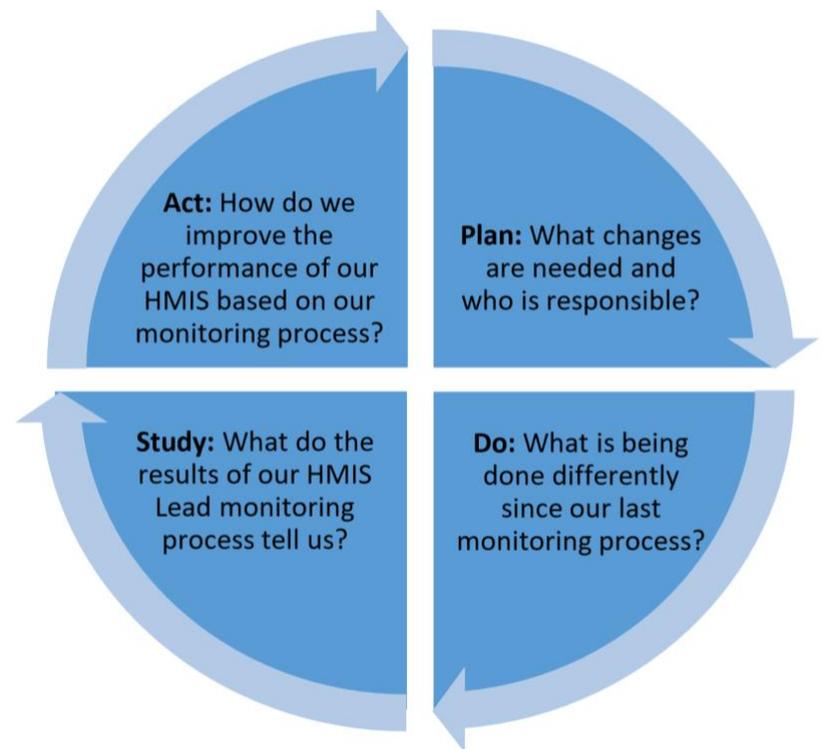
Monitoring should not be thought of as simply an annual checklist for compliance. Instead, think of the monitoring process as being most effective when engaged in as a continuous quality improvement cycle that identifies both areas of improvement **and** action steps and strategies for addressing the underlying cause of the monitoring finding. Consider the following approaches to monitoring HMIS data quality:

1. “Does the HMIS Lead monitor all HMIS-participating agencies for data quality?”
2. “Has the HMIS Lead’s data quality monitoring process led to improvements in HMIS-participating agency data quality?”

In both examples, the monitoring questions can be answered with a simple “yes” or “no” response. However, a “yes” response in the first example indicates a measure of compliance, but not a measure of success, whereas a “yes” response in the second example indicates both compliance and success since the monitoring process is leading to an improvement in data quality, the intended outcome of monitoring data quality. The improvement may be due to:

- Stronger incentives and/or sanctions for data quality issues;
- Increased availability of data quality results through reports to the CoC or the publishing of community-wide data quality dashboards; or
- The ability to monitoring for underlying causes of data quality issues, such as insufficient license allocations, frequent staff turnover, an HMIS workflow that is difficult to navigate, or other causes.

Communities that strive to incorporate the monitoring process into a set of quality improvement strategies should think of monitoring as an ongoing process that reinforces the knowledge gained through monitoring with new opportunities for funding, training, capacity building, and strategic planning:



Documentation to Complete the Monitoring Process

1. The results of the monitoring process will largely depend on the specific roles, responsibilities, functions, and deliverables that the CoC's HMIS Lead is required to fulfill per the terms of any applicable governance charters, memorandums of understanding (MOUs), or other binding documents such as contracts or statements of work. Do not extrapolate assumptions or expectations with requirements when it comes to monitoring.
2. Review the HMIS Annual Performance Report (APR) for accuracy and consistency between information provided to HUD and information used for baseline HMIS Lead monitoring requirements. Comparison between the monitoring tool and the [HMIS APR](#) may include:
 - Implementation Information and Policy Development
 - HMIS Software Information and Reporting
 - Staff Responsibilities and Support
 - HMIS End User Training
 - Governance and Standards
 - System Coverage and HMIS Use
 - Financial Information
3. Update the CoC's HMIS Lead monitoring tool and process based on the most up-to-date and specific information drawn from applicable governance charters, memoranda of understanding, or other binding documents such as contracts or statements of work.
4. Supplement the previous process with the following HMIS Lead Improvement Evaluation Matrix to ensure that monitoring results lead the CoC to make informed decisions regarding investment, training and capacity building, restructured agreements, and defined outputs and outcomes regarding the performance of the HMIS Lead.

Preparing for and Conducting the Monitoring Process

The monitoring process is best used as a collaborative, transparent, and strategic activity that leads to continuous quality improvement, improved collaboration across HMIS stakeholders, increased resources to support a CoC's HMIS, and enhanced use of data to support efforts to prevent and end homelessness. Communities can employ a project management or process change approach to setting up the monitoring process. A common approach may look like the following Plan-Do-Study-Act example:

1. **Plan:** Planning for the monitoring process must include a determination of *who* will be involved in the monitoring process, *what* documentation and performance indicators will be included as baseline measurement sources, and *how* the monitoring process will be conducted.
 - a. **Who?** CoCs need to determine who will be involved in the monitoring process. A CoC's HMIS or Data Committee may have valuable insight into the overall performance of the HMIS Lead from the perspective of both quality and compliance. The Collaborative Applicant or CoC lead organization may also have resources and infrastructure support to assist the monitoring process, or an

external evaluator may partner with data leadership from the CoC to conduct a formal monitoring and evaluation process. In some communities, the same organization has been designated as both the HMIS Lead and the Collaborative Applicant, or otherwise serves as the CoC lead organization; in these cases, the CoC must ensure that no conflicts of interest are present. The CoC should reference the HMIS Governance Charter and other applicable agreements to define which specific roles and responsibilities regarding HMIS are assigned to various stakeholders and monitor accordingly.

- b. **What?** CoCs need to ensure that the monitoring process is connected to binding agreements, contracts, policies, or other HMIS governing and operational documents to make the monitoring process as transparent and objective as possible. CoCs should review any applicable governance charters, memoranda of understanding, or other binding documents such as contracts or statements of work and compare the requirements, terms, conditions, and other deliverables to form the basis of the CoC's HMIS Lead monitoring process. Every CoC is different and every CoC has different needs when it comes to HMIS administration and management. The CoC's monitoring tool that is used for monitoring the HMIS Lead should account for these local requirements and contexts. CoCs may choose to utilize the HMIS Lead Improvement Evaluation Matrix as the basis of their locally developed HMIS Lead monitoring tool, but should clearly define the requirements that are applicable to their own CoC, HMIS implementation, and HMIS Lead.
 - c. **How?** CoCs need to plan for the monitoring process in the context of human resources, stakeholder roles and responsibilities, and other CoC-wide data and HMIS priorities. Depending on the specific administrative, customer service, management, operational, and reporting tasks that are required of the HMIS Lead, different sources of measurement will need to be incorporated into the monitoring process. For instance, if the HMIS Lead is responsible for operating the HMIS service desk, data related to ticket response times may be of interest.
2. **Do:** Monitoring outputs and outcomes for both compliance and performance is crucial for CoCs to understand how their HMIS is being administered and what can be done to improve its performance. Effective management of the HMIS should incorporate regular monitoring across all HMIS components, including administration, data quality and reporting, and training. Some components are easier to monitor than others, and CoCs should allocate resources according to the level of effort, local priorities, and the ability to improve quality and performance. For instance, many CoCs have automated data quality reports that can be used to monitor and report on data quality indicators, such as timeliness and completeness on a regular weekly or monthly cycle. Monitoring the compliance and performance of an HMIS Lead's capability to administer the HMIS may require a much higher level of effort, given the complexity of tasks for which the HMIS Lead is responsible and the qualitative nature of system administration. CoCs must incorporate written documentation and agreements—such as memoranda of understanding, contracts, or statements of work—into the monitoring process to set objective and transparent baselines. Monitoring performance against assumptions or ambiguous expectations is a meaningless exercise likely to lead to fraught relationships and irreparable damage to the CoC's HMIS governance structure. When engaging in the monitoring process, it is imperative to be precise—meaning detailed and specific—and accurate—meaning correct and unambiguous to all entities involved in the monitoring

process. A few helpful steps that CoCs can take to ensure precision and accuracy include:

- a. **Define:** CoCs should carefully define the output or outcome being monitored, using specific deliverables and terminology from written agreements, contracts, or statements of work, as applicable. Definitions should be known to both the CoC and HMIS Lead (and other entities involved in the monitoring process) and not open to interpretation.
 - b. **Select:** CoCs should select a measure or monitoring variable that accurately represents the performance or quality of the HMIS Lead. Is there any value in only measuring the response times for service desk tickets, when few of the tickets are resolved on the first try and subsequently need to be reopened or escalated? It can be difficult to account for every qualitative or quantitative metric in the monitoring process, so CoCs should select measures and metrics that are no more or less specific than the performance indicators written into agreements, contracts, and scopes of work.
 - c. **Measure and Monitor:** CoCs should work to build out data collection and measurement processes to ensure that information is available to inform the monitoring process. A CoC's contract with an HMIS Lead that requires the provision of service desk and technical support without further detail may be difficult to monitor, as measures of quality such as timeliness of response, comprehensiveness of the information provided, and successful resolution without escalation are not included. CoCs should document any gaps in data collection or measurement processes, and incorporate additional detail into written agreements, contracts, and statements of work as terms are renewed.
3. **Study:** Studying the results of the monitoring process needs to be a deliberate, transparent, and objective activity. Given that HMIS administration, management, and operation is typically a shared responsibility across multiple groups of stakeholders, CoCs need to carefully review how the monitoring findings or results impact each stakeholder group. CoCs should also consider how clearly and accurately roles and responsibilities have been defined, communicated, and operationalized. HMIS roles and responsibilities should be defined and codified in the CoC's HMIS governance charter, communicated through written agreements and training opportunities, and then operationalized and reinforced through monitoring, measurement, and evaluation processes. CoCs owe it to themselves and their HMIS partners—including the HMIS Lead and HMIS end users—to fully build out this process to ensure that the best course of action is being taken in response to monitoring findings. Just as a doctor reviews lab tests before prescribing a course of treatment to a patient, CoCs should review monitoring findings and the underlying cause of compliance and performance results before investing resources in a plan of action to improve the HMIS implementation.
 4. **Act:** Taking action based on the monitoring process results is the only way a community can expect to improve the administration and operation of its HMIS implementation. CoC and HMIS leadership should carefully assess the findings and results of the monitoring process, and work to identify the underlying causes of these findings. In many cases, the outputs and outcomes that reflect baseline standards and requirements used to form the monitoring process can indicate other issues related to resource constraints, capacity issues, or HMIS governance and structure. Developing a

plan for action should consider the community context and specific organizational readiness factors, including some of those listed below:

- a. **Prioritizing Activities:** The CoC’s HMIS Lead monitoring process may identify multiple areas for performance improvement. The CoC should determine which activities or monitoring findings are the most important to address, based on HUD reporting or funding requirements, data quality or reporting components that impact competitiveness for grant funding, end user satisfaction and capacity, or administrative and management capabilities.
- b. **Adopting Best Practices:** CoCs should collect information and identify promising practices for the administration and operation of their HMIS implementation and adopt best practices in conjunction with their HMIS Lead. The attendance at conferences, peer-to-peer calls, or other learning opportunities presented by HUD are great ways to learn about innovation and successful strategies regarding HMIS.
- c. **Adapting for Local Context:** CoCs should consider their local context—such as the size and type of the CoC, the strength of the local HMIS governance structure, and HMIS vision and strategy—and adapt best practices accordingly. Resource constraints are variation in HMIS participation across partner agencies may inform how and when certain practices are implemented within the CoC.
- d. **Securing Resources:** CoCs should assess local priorities and consider whether existing resources can be reallocated to implement HMIS improvements, or new resources need to be secured. CoCs should approach conversations regarding resources as strategically as possible, accounting for both current and future needs. CoCs should also think beyond financial resources and address the number and capacity of HMIS Lead personnel, the proficiency of HMIS end users, and the continuing investments in training and capacity building opportunities and development of organizational partnerships. CoCs should work to ensure that resource constraints do not limit action plans or improvement strategies from being implemented, but should instead build capacity to secure additional resources as needed to support an ongoing cycle of improvement by the HMIS Lead and other HMIS stakeholders.
- e. **Implementing and Managing Change:** Implementation of new policies and practices is a long-term undertaking. CoCs should be open and honest about the time, resources, and level of commitment necessary to implement change. Establishing an end point for when success will be measured is important to define and communicate to HMIS stakeholders.

The following HMIS Lead Improvement Evaluation Matrix is meant to support the improvement process by measuring the quality and effectiveness of the HMIS Lead across nine distinct domains:

1. HMIS Lead Requirements
2. HMIS Governance
3. System Administration
4. Policy Development and Implementation
5. HMIS Software Vendor Monitoring

6. Training, Customer Service, and End User Support Services
7. Data Analysis and Reporting
8. Staff Management and Capacity
9. Strategic Planning and HMIS Growth

The components of the HMIS Lead Improvement Evaluation Matrix are defined below:

- **Question ID:** Organizing structure for monitoring the HMIS Lead across each of the nine domains.
- **Improvement Assessment Question:** Monitoring question that establishes a baseline against which a community may choose to monitor its HMIS Lead. Some questions are HUD requirements, but many are common administrative, reporting, or training areas that CoCs often want or need from their HMIS Lead. These Improvement Assessment Questions should be compared with applicable contracts, the HMIS governance charter, MOUs, or other written agreements that specifically define the roles and responsibilities of the HMIS Lead. Depending on a CoC's HMIS governance structure, the HMIS Lead may be responsible for all roles and responsibilities, or they may be delegated to or shared with other HMIS stakeholders such as HMIS participating agency administrators, the HMIS Software Vendor or other external consultant, or the relevant CoC data committee.
- **Response:** CoC and HMIS leadership should select the appropriate “yes” or “no” response for each Improvement Assessment Question. The questions are generally structured with multiple parts to measure 1) whether the activity is being done by the HMIS Lead, 2) whether the frequency, modality, or quality of the activity is appropriate, and 3) whether the activity has led to improved performance or effectiveness across the HMIS implementation during the monitoring period.
- **Response Justification:** Communities should clearly document a justification for the monitoring response, based on both qualitative and quantitative data as available and applicable. Improving performance requires both completion of the monitoring process and the ability to diagnose or otherwise discern the underlying cause of a finding to appropriately address the issues of non-compliance or poor performance. References to written agreements, HMIS governance charters and policies and procedures, or other objective performance metrics are highly recommended to support the monitoring response.
- **How to Monitor:** Recommended processes to support the transparent and collaborative monitoring process. Communities should document the policies, procedures, or agreements—as well as sources such as surveys, performance audits, and focus groups—to ensure transparency in the monitoring process and to provide the HMIS Lead with an opportunity to respond to the findings of the monitoring process. Sources must be used to identify the baseline and ensure appropriate definitions, clear roles, and responsibilities.
- **Proposed Improvement Strategy:** Building from the Response Justification, communities should select one or more Improvement Strategies to address the underlying cause of the monitoring findings. Issues related to organization or human capacity may need to be addressed, as well as the need to implement a revised governance structure or clarify roles and responsibilities. Incorporating feedback loops and accountability mechanisms are also helpful strategies that are broadly applicable across many domains.

Section 1: HMIS Lead Requirements. HUD has prescribed certain requirements of HMIS Leads in the CoC Program interim rule, through notice, and through HMIS Data and Technical Standards. Many HMIS implementations are supported by federal funding from the CoC Program, Emergency Solutions Grants (ESG) Program, and federal partner programs. The CoC Program Interim rule, ESG Program interim rule, and federal partner program regulations establish eligible costs and recordkeeping requirements that CoCs and HMIS Leads should be familiar with. The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR § 200 establish additional standards for administering federal grants. While HUD will continue to update and refine requirements and expectations of HMIS Leads at the organizational level through rules, notices, and standards, CoCs should maintain continuous oversight of the HMIS Lead in the context of local data and reporting requirements, the needs of HMIS end users and other stakeholders, and as a trusted partner to assist the community in its work to prevent and end homelessness.

Question ID	Improvement Assessment Question	Response	Response Justification	How to Monitor	Improvement Strategies
1.1	Can the HMIS Lead document that it has been formally designated by the CoC to manage the Continuum’s HMIS for its geographic area?	Yes No	Responsibilities of the Continuum of Care S.578.7(b)(2)	The CoC should review the CoC governance charter, HMIS governance charter, relevant written agreements and policies and procedures, and CoC meeting minutes for documentation of the HMIS Lead designation.	1: The HMIS Lead and CoC should ensure the CoC and HMIS governance charter(s) are publicly available on organizational websites. 2: The CoC should determine a regular timeframe for assessing the HMIS Lead’s performance and engaging in a procurement or designation process to ensure transparency.
1.2	Can the HMIS Lead document that it is a nonprofit organization, state or local government, or instrumentality of State or local governments, and is otherwise eligible to apply for HMIS project grants?	Yes No	CoC Program interim rule definition of “eligible applicant” and S.578.15(a)	The CoC should review tax eligibility records or nonprofit incorporation certification of HMIS Lead agency, if the HMIS Lead is a nonprofit entity. The CoC should confirm the correct project applicant profile information in <i>e-snaps</i> .	1: If the HMIS Lead is an eligible applicant but cannot provide nonprofit status, the HMIS Lead must obtain nonprofit certification from federal or state taxing authorities. 2: If the HMIS Lead cannot document that it is an eligible applicant, the CoC must immediately engage in the HMIS Lead transition process and should engage with HUD to secure technical assistance resources.
1.3	Does the HMIS Lead consult with the CoC and collaborative applicant to update annually, and	Yes No	Responsibilities of the Continuum of Care S.578.7(a)(5)	The CoC should review the CoC’s governance charter, HMIS governance charter, and HMIS policies and procedures and document 1) the	1: The CoC and HMIS Lead should collaboratively review the governance charter to determine whether there are areas for clarification or improvement. Formal documentation and approval by

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	develop and follow, a governance charter that includes all policies and procedures needed to comply with HMIS requirements prescribed by HUD?			HMIS Lead's role in consulting on the development and update of the documents, and 2) that the development and update of the documents occurred annually and with the involvement of all appropriate stakeholders	the CoC of any updates should follow CoC processes. 2: The HMIS Lead and CoC should create a written process for future reviews of governance charter, to ensure that a review and revision of the governance charter occurs at least annually and that the appropriate stakeholders are involved.
1.4	Does the HMIS Lead provide performance and outcomes data from the HMIS to support the establishment of performance targets appropriate for population and program type by the CoC, and support the CoC's evaluation of performance outcomes?	Yes No	Responsibilities of the Continuum of Care S.578.7(a)(6)	The CoC should review the process for requesting standard and custom reports from the HMIS Lead for the purposes of performance and outcomes review, and measure the timeliness, responsiveness, and accuracy or validity of data provided by the HMIS Lead.	1: The CoC and HMIS Lead should define a process for prioritizing report requests according to impact, such as funding opportunity, CoC-wide trend analyses, or policy implication. 2: The HMIS Lead should automate or routinize standard performance and outcomes reports. 3: The HMIS Lead should consolidate custom reports of a similar nature to increase efficiency. 4: The CoC and HMIS Lead should develop or improve linkages and feedback loops between those who provide performance and outcomes data and those who interpret or act upon the data.
1.5	Does the HMIS Lead provide HMIS data as needed by the CoC to evaluate project-level performance outcomes for CoC and ESG program-funded projects?	Yes No	Responsibilities of the Continuum of Care S.578.7(a)(7)	The CoC and HMIS Lead should collaboratively assess what project-level performance outcomes data is required to evaluate CoC and ESG program-funded projects, and review whether all necessary data from	1: The CoC and HMIS Lead should review HUD's guidance on project-level rating and ranking for the CoC Program Competition and incorporate HMIS data that can be measured objectively. 2: The HMIS Lead should automate or routinize standard performance and outcomes reports.

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				HMIS has been provided in a timely, responsive, and accurate manner.	
1.6	Does the HMIS Lead implement the HMIS privacy plan, security plan, and data quality plan that has been approved by the CoC, to the extent the HMIS Lead is responsible for doing so, in accordance with the HMIS governance charter and applicable agreements?	Yes No	Responsibilities of the Continuum of Care S.578.7(b)(3)	The CoC and HMIS Lead should jointly review HMIS privacy, security, and data quality plans. The CoC should review the findings of privacy, security, and data quality monitoring processes to ensure policies and procedures are accurately implemented and adhered to by HMIS stakeholders, and that the monitoring process is documented and results are used to improve the overall administration and operation of the CoC's HMIS.	1: The CoC and HMIS Lead should implement feedback mechanisms, such as an HMIS end user working group, to ensure that written plans, policies, and procedures are operationalized with fidelity. 2: The CoC and HMIS Lead should ensure a regular monitoring process with clearly defined privacy, security, and data quality policies and procedures providing a measurable baseline.
1.7	Does the HMIS Lead provide information regarding HMIS participation to the CoC to ensure consistent participation of recipients and subrecipients in the HMIS?	Yes No	Responsibilities of the Continuum of Care S.578.7(b)(4)	The CoC and HMIS Lead collectively review bed coverage and HMIS participation rates for the CoC's geographic area. If necessary, the CoC should define HMIS participation, accounting for expectations or requirements related to direct HMIS data entry, or data integration solutions available to the CoC. The CoC should use a standard methodology for calculating bed coverage	1: The CoC and HMIS Lead should regularly review bed coverage rates, utilization rates, and data completeness rates to ensure consistent participation in the single HMIS designated by the CoC for the geographic area. 2: The CoC and HMIS Lead should develop policies and procedures to codify bed coverage and HMIS participation requirements. 3: The CoC and HMIS Lead should review HUD guidance regarding bed coverage rates, and provide incentives

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				by dividing the HMIS participating beds by the number of year-round beds dedicated to homeless persons in the geographic area covered by the CoC, excluding beds funded by victim service providers.	as available and appropriate to encourage increased HMIS participation.
1.8	Does the HMIS Lead provide information to the CoC regarding HMIS administration in relation to HUD's requirements to ensure compliance?	Yes No	Responsibilities of the Continuum of Care S.578.7(b)(5)	The CoC and HMIS Lead should regularly review HUD's requirements of HMIS and compare regulation and notice to the local administration of the HMIS. The CoC should evaluate the extent to which the HMIS Lead stays informed of HUD requirements and how changes are made to HMIS implementation based on changing HUD regulations.	1: The CoC and HMIS Lead should ensure consistent connection to, and participation in, HUD's System Administrator forums and other group learning opportunities, to remain up to date with all HMIS guidance. 2: The CoC and HMIS Lead should review written guidance and training materials to remain knowledgeable about HUD's HMIS requirements. 3: The CoC and HMIS Lead should use the CoC's HMIS or Data Committee to review HMIS administration requirements and best practices, and implement them locally with HMIS stakeholders across the CoC.
1.9	Is the HMIS Lead the only entity that incurs costs for the activities listed in the CoC Program interim rule at 578.57(a)(2)?	Yes No	CoC Program interim rule Homeless Management Information System 578.57(a)(2)	The CoC and HMIS Lead reviews accounting and auditing reports, general ledgers, and revenue—expense statements along with all HMIS project grants to assure compliance with grant administration requirements.	1: The CoC should align the expected roles and responsibilities of the HMIS Lead with HMIS eligible costs as defined by HUD. For costs not eligible through 578.57(a)(2), the CoC and HMIS Lead should develop a funding strategy to identify which non-CoC funds will be used to incur those costs. 2: The HMIS Lead should improve its recordkeeping, accounting, or financial systems to indicate the eligibility of any

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					costs incurred with HMIS-dedicated project grants. 3: The HMIS Lead should ensure clear and transparent documentation that costs are allowable and allocable per the requirements of HMIS grants, accounting for grant operating years and approved and eligible cost categories within the HMIS grant.
1.10	Can the HMIS Lead document that it draws down funds from eLOCCS at least once per quarter of the program year, in accordance with 578.85(c)(3) of the CoC Program interim rule?	Yes No	CoC Program interim rule Timeliness Standards S.578.85(c)(3)	The CoC and HMIS Lead reviews eLOCCS payment invoices, accounting and auditing reports, general ledgers, and revenue—expense statements along with all HMIS project grants to assure compliance with grant administration requirements.	1: The HMIS Lead must ensure that recordkeeping procedures and documentation exist that reflects minimum timeliness standards for accessing CoC Program funds. 2: The HMIS Lead should consult with the CoC to ensure that the drawdown of CoC programming funds is sufficient to support continuous and ongoing support of the CoC and HMIS end users by the HMIS Lead. 3: The HMIS Lead ensures that approving officials have accessed eLOCCS at least every 90 days to prevent suspension of system access due to inactivity.
1.11	Does the HMIS Lead maintain the necessary records and documentation that may be needed to complete a HUD performance review, in accordance with (578.107(a)(1) of	Yes No	CoC Program interim rule Sanctions S.578.107(a)(1)	The CoC should review applicable timekeeping, recordkeeping, audit reports, and other financial and reporting documentation—including procurement, bid development, and solicitation—that are provided by the HMIS Lead.	1: The HMIS Lead should implement a recordkeeping and documentation process, including a method for documenting expenditures on eligible costs. 2: The HMIS Lead should ensure that timekeeping, recordkeeping, and documentation policies are sufficiently detailed to ensure costs are allocable

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	the CoC Program interim rule?				and allowable to specific budget line items. 3: The CoC should reference HUD's CoC Program monitoring exhibit for HMIS requirements to confirm the appropriateness of costs.
1.12	Does the HMIS Lead maintain documented procurement procedures and maintain oversight of all contractors or vendors in accordance with 2 CFR § 200?	Yes No	2 CFR 200	The CoC should review applicable timekeeping, recordkeeping, audit reports, and other financial and reporting documentation—including procurement, bid development, and solicitation—that are provided by the HMIS Lead.	1: The HMIS Lead must develop a procurement policy that complies with 2 CFR § 200 and all other federal procurement standards. 2: The HMIS Lead should demonstrate an understanding of all procurement methods through its procurement policies and procedures, to include: micro-purchases, small purchases, sealed bids, competitive proposals, noncompetitive proposals, and the thresholds that each method entails. 3: The HMIS Lead should continue to maintain knowledge of all GAAP and Office of Management and Budget threshold requirements in accordance with 2 CFR § 200. 4: The HMIS Lead should ensure that its recordkeeping and accounting system or software provides a sufficient level of detail to track revenue and expenses by funding source.
1.13	Does the HMIS Lead keep records to show compliance with its organizational conflict-of-interest requirements, the CoC Board conflict-	Yes No	CoC Program interim rule requirements on Conflicts of Interest at 578.95 and	The CoC and HMIS Lead collectively review the HMIS Lead's organizational conflict of interest policy and adherence to any CoC-	The HMIS Lead should update any organizational conflict of interest policies to align with HUD's requirements as identified in the CoC Program interim rule.

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	of-interest requirements, a copy of the personal conflict-of-interest policy developed and implemented to address personal gain or benefit, and records supporting exceptions to the personal conflict-of-interest prohibitions?		Recordkeeping Requirements at 578.103(a)(11)	wide conflict of interest policies.	
1.14	Does the HMIS Lead have oversight and data entry/editing ability for Project Descriptor Data Elements (PDDE)?	Yes No	HMIS Data Standards Manual	The CoC and HMIS Lead should jointly review system administration controls as provided by the HMIS Software Vendor and implemented by the HMIS Lead.	The HMIS Lead should review all HUD guidance related to HMIS standards and project setup to ensure correct project setup and accurate representation of project type and service delivery components in the HMIS.
1.15	Does the HMIS Lead regularly review duplicate client records, and work to de-duplicate multiple records with distinct Personal Identifier metadata elements that represent the same individual based on identifying information (such as name, date of	Yes No	HMIS Data Standards Manual	The CoC and HMIS Lead should review data quality plans and reports on duplicate data quality indicators based on Universal Data Elements and Metadata Elements that can be used to identify possible duplicate clients. The CoC should also assess the ways in which the HMIS Lead uses system functionality to de-duplicate client records to assure	1: The HMIS should implement regular data quality checks and reviews to ensure a minimal number of duplicate clients are in the HMIS at any given time. 2: The HMIS Lead should develop an automated or routinized process for identifying possible duplicate client records and addressing duplicate records through a record merge process. 3: The HMIS Lead should incorporate data quality standards and de-duplication processes to merge duplicate client records when a confidence level has been met (such as merging client records when a 95 percent likelihood of

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	birth, or Social Security Number)?			appropriateness and efficiency.	multiple records identifying the same client).

Section 2: HMIS Governance. Establishing a well-defined governance structure for a CoC’s HMIS implementation can ensure success through clear roles and responsibilities, transparent lines of communication, and objective requirements for supporting the HMIS implementation by the CoC, HMIS Lead, HMIS Participating Agencies, HMIS Vendor, and other HMIS stakeholders. Because HMIS is generally a shared responsibility across the CoC, HMIS Lead, HMIS participating agencies and end users, and the HMIS Software Vendor, a comprehensive HMIS governance model is essential to provide requirements and expectations across the HMIS implementation and data management lifecycle from data collection and entry, system administration and operation, to reporting and data analysis.

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2.1	Is there a written agreement (such as an MOU or governance charter) that clearly defines the roles and responsibilities of the HMIS Lead, CoC, and all other HMIS stakeholders across the HMIS implementation?	Yes No	Locally determined	The CoC and HMIS Lead should collaboratively review written agreements to ensure accuracy, clarity, and common understanding of all defined roles and responsibilities of the HMIS Lead and other HMIS stakeholders, as applicable within the CoC’s HMIS structure. The written agreement should always be current and include authorization from relevant parties.	1: The CoC and HMIS Lead should jointly develop and implement an MOU or governance charter that clearly and accurately describes all roles and responsibilities of all entities in relation to the HMIS implementation. 2: HMIS Lead, CoC, and other HMIS stakeholders should regularly review the written agreement(s) to ensure accuracy between the required and expected activities of the HMIS Lead and other HMIS stakeholders and the actual administration and operation of the HMIS by stakeholders. 3: The HMIS Lead and CoC should consider sharing a written agreement on the CoC website or other public space to further common understanding of roles and responsibilities.
2.2	Is there a written agreement between the HMIS Lead, CoC, and HMIS participating agencies that defines the specific roles and responsibilities of HMIS	Yes No		The CoC and HMIS Lead should collaboratively review written agreements to ensure accuracy, clarity, and common understanding of all defined roles and responsibilities of HMIS participating agencies, and solicit feedback on the separate and/or shared roles and responsibilities of	1: The HMIS Lead, CoC, and HMIS participating agencies should develop and agree upon defined roles and responsibilities for all HMIS participating agencies, including any agency manager or administrator and end users or data collection and entry staff. 2: The HMIS Lead, CoC, and HMIS participating agencies should review

Question ID	Improvement Assessment Question	Response	Response Justification	How to Monitor	Improvement Strategies
	participating agencies?			administering the HMIS between the HMIS Lead and HMIS participating agencies. The written agreement should always be current and include authorization from relevant parties.	agreements for accuracy and clarity, and make revisions or updates as needed to assure applicability.
2.3	Is there a written agreement between the HMIS Lead, CoC, and HMIS end users that defines the specific roles and responsibilities of HMIS end users, and that is clearly linked to the HMIS policies and procedures and plans related to privacy, security, and data quality?	Yes No		<p>The CoC and HMIS Lead should collaboratively review the quality and comprehensiveness of the written agreement with HMIS end users and ensure its accuracy with and alignment to CoC-wide HMIS policies and procedures and privacy plan, security plan, and data quality plan.</p> <p>HMIS stakeholders should collect feedback on the accuracy of the written agreement compared to the actual practice or implementation of the HMIS end users' roles and responsibilities. The written agreement should always be current and include authorization from relevant parties.</p>	<p>1: The HMIS Lead and CoC should assess how the HMIS policies, procedures, and plan have been operationalized by HMIS end users through surveys, focus groups, monitoring, evaluation, and reporting strategies.</p> <p>2: The HMIS Lead and CoC should revise and update agreements to accurately reflect the defined roles and responsibilities of all HMIS end users and license holders, including any agency manager, administrator and end users, or data collection and entry staff.</p> <p>3: The HMIS Lead should incorporate these agreed-upon roles and responsibilities of HMIS participating agencies into the end user monitoring process for these baselines, particularly regarding privacy, confidentiality, and data security through HMIS access and use protocols.</p> <p>4: The HMIS Lead and CoC should develop and deliver training or provide technical assistance to HMIS end users on HMIS policies and procedures and plans related to privacy, security, and data quality to fill any gaps in knowledge and to ensure that HMIS use</p>

Question ID	Improvement Assessment Question	Response	Response Justification	How to Monitor	Improvement Strategies
					accurately reflects the CoC's HMIS policies and procedures.
2.4	Does the HMIS Lead actively participate in and contribute to CoC policy and planning decisions, including providing reports on data quality and performance at the levels of system, agency, and project?	Yes No		The CoC and HMIS Lead should collaboratively review applicable CoC and committee-level work plans, scopes of work, or deliverables to assure appropriate levels of HMIS Lead participation within the CoC-wide data leadership structure, such as active leadership or facilitation of applicable HMIS user workgroups or relevant data or performance management committees of the CoC.	<p>1: The HMIS Lead attends all relevant CoC policy and planning meetings, including those focused on data quality and performance at the levels of system, agency, and project.</p> <p>2: The HMIS Lead produces data quality and performance reports for the levels of system, agency, and project that are used during CoC policy and planning meetings.</p> <p>3: The HMIS Lead actively engages in CoC policy and planning discussions, providing data quality and performance reports for the levels of system, agency, and project, including analysis and interpretation.</p> <p>4: HMIS Lead organizes, facilitates, and leads all relevant HMIS user workgroups and data or CoC performance management committee meetings, to the extent desirable by the CoC.</p> <p>5: The HMIS Lead reviews CoC data priorities and organizes workgroups and committees to address unmet needs.</p> <p>6: The CoC and HMIS Lead identify resources to add staff capacity or otherwise increases ability to support data use and data literacy for CoC planning purposes.</p>

Section 3: System Administration. System administration of the CoC’s HMIS is one of the most critical services that the HMIS Lead provides to a CoC. Effective system administration ensures that the CoC’s HMIS operates as consistently and reliably as possible, with all HMIS projects correctly set up, all reports generated accurately, and all policies and procedures implemented with fidelity. HUD does not define system administration as being distinct from the roles and responsibilities of the HMIS Lead; however, some communities have defined specific duties of an individual System Administrator within the HMIS Lead organization, due to the specialized and technical nature of HMIS administration. CoCs and HMIS Leads should clearly define the required system administration services that are to be provided locally and those system administration services that are provided by the HMIS Software Vendor.

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3.1	Does the HMIS Lead perform all system administration, management, and operational tasks in accordance with applicable MOUs, contracts, or statements of work?	Yes No	Locally determined	The CoC should review applicable MOUs, contracts, or statements of work that it has with the HMIS Lead and monitor performance against specific measurable outputs and outcomes. If the CoC does not have an MOU, contract, or statement of work with the HMIS Lead, the CoC should ensure that one is developed and that the monitoring process includes any requirements of the HMIS Lead and excludes any undefined activities or tasks.	1: Use HUD’s System Administrator Checklist to assess the tasks required or expected of the HMIS Lead. 2: The HMIS Lead and CoC should develop an MOU, contract, or statement of work that is binding and specifically defines, in measurable terms, the activities, tasks, roles, and responsibilities by which the HMIS Lead will be monitored.
3.2	Has the HMIS Lead implemented project set up and data collection guidance per HUD and federal partner program HMIS Manuals?	Yes No		The CoC and HMIS Lead should confirm and validate all project typing, set up, and workflow and data collection requirements for all HMIS participating projects, and consult with HMIS participating agencies to correct reporting outputs.	1: Access and review HUD’s CoC and ESG Program HMIS Manuals and federal partner program manuals as necessary to complete project set up and data collection guidance in the HMIS. 2: The HMIS Lead should use the HMIS Project Set Up Tool to ensure correct project set up in accordance with funding source requirements, program design, and housing and service delivery methods.

Question ID	Improvement Assessment Question	Response	Response Justification	How to Monitor	Improvement Strategies
					<p>3: Review HIC to ensure accurate reporting of beds and project types.</p> <p>4: Review programming specifications with the HMIS Software Vendor to ensure accurate project set up and data collection capabilities in the software per HUD and federal partner guidance.</p>
3.3	Does the HMIS Lead maintain documentation on and demonstrate sufficient understanding of the HMIS Software Vendor’s table structure, data model, and naming conventions to ensure accuracy and reliability of HUD required and CoC custom reports?	Yes No		The CoC and HMIS Lead jointly compare available HUD reporting guidance—including report specifications, HMIS Data Dictionary, and HMIS Standard Reporting Terminology Glossary—to reporting guidance provided by the HMIS Software Vendor to ensure accurate report generation.	<p>1: The HMIS Lead should review HMIS software vendor documentation to ensure correct programming specifications and report logic.</p> <p>2: The HMIS Lead should periodically review HUD’s HMIS Data Dictionary, Data Standards Manual, and CSV/XML format specifications to ensure accuracy in data types, data elements, and response categories.</p> <p>3: The HMIS Lead and CoC data leadership define a process for standardizing custom data (assessment, prioritization, service, referral, or goal planning/exit data) and documents custom data elements and response categories.</p> <p>4: The HMIS Lead should use the HUD AAQ help desk to receive specific guidance on HMIS data and HUD required report programming specifications.</p>
3.4	Does the HMIS Lead monitor and test HMIS Software Vendor updates, upgrades, patches, and fixes to ensure seamless HMIS access and use by	Yes No		The HMIS Lead should make available to the CoC documentation of their monitoring efforts of HMIS Software Vendor updates and fixes, such as notifications that HMIS Software Vendor updates are available for	<p>1: HMIS Lead monitors, tests, and has awareness of report updates and upgrades, system logic, and HUD report updates as released.</p> <p>2: The CoC and HMIS Lead updates the terms and conditions of the contract with the HMIS Software Vendor to</p>

Question ID	Improvement Assessment Question	Response	Response Justification	How to Monitor	Improvement Strategies
	HMIS participating agencies?			testing, or evidence that the HMIS Lead has used test cases or scenarios to validate updates and upgrades, per local HMIS work flow or reporting requirements.	ensure that updates, upgrades, patches, and fixes are released with sufficient time for testing by the HMIS Lead.
3.5	Does the HMIS Lead monitor license allocations across the CoC and license utilization at the agency and end-user levels to ensure appropriate access to the system, in accordance with a documented methodology for HMIS end-user license allocation as defined in HMIS Policies and Procedures?	Yes No		The CoC and HMIS Lead jointly review HMIS user license allocation by agency or program on a regular basis and use a written plan for managing license allocations and system access in a transparent and strategic manner. The CoC should review the HMIS Lead's process for ensuring licenses are managed according to the CoC's approved plan.	<p>1: The CoC and HMIS Lead develop a license allocation plan with a transparent methodology and work to align license allocation processes with HMIS security and training requirements as outlined in the HMIS policies and procedures.</p> <p>2: The HMIS Lead reviews license utilization by frequency of log-in or data entry reports to ensure appropriate license allocation by agency and HMIS end users.</p> <p>3: The CoC and HMIS Lead take action to deactivate or rescind licenses that have not been recently used, in accordance with the CoC's HMIS security plan.</p> <p>4: The HMIS Lead provides remedial training to end users whose licenses have been deactivated or rescinded due to inactivity.</p> <p>5: The CoC and HMIS Lead conduct a gaps analysis to increase the availability of HMIS licenses based on current demand and expected HMIS participation increases.</p>

Section 4: Policy Development and Implementation. HMIS Leads, in consultation with the CoC and collaborative applicant, are required to develop, follow, and annually update HMIS policies and procedures that ensure compliance with HUD requirements and that ensure consistent operation of—and participation in—the CoC’s HMIS implementation (578.7(a)(5). The CoC is also required to review, revise, and approve a privacy plan, security plan, and data quality for the HMIS, (578.7(b)(3) which is most effectively done in collaboration with the HMIS Lead. Because the privacy, security, and data quality plans are implemented in the HMIS, the HMIS Lead is well-suited to monitor compliance with these plans, even if other stakeholders (the CoC or HMIS end users) are effectively responsible for ensuring compliance with these requirements. A CoC may designate the HMIS Lead as the responsible entity through its HMIS governance charter or MOU, contract, or other binding agreement such as a statement of work.

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4.1	Does the HMIS Lead actively collaborate with the CoC to review, revise, and approve a privacy plan, security plan, and data quality for the HMIS?	Yes No		The CoC should review the steps that the HMIS Lead has taken to collaborate with the CoC when reviewing, revising, and making recommendations to the CoC’s privacy plan, security plan, and data quality for the HMIS.	The CoC should ensure appropriate linkages between the CoC and HMIS Lead through a CoC HMIS or Data Committee, and that HMIS policies, procedures, and plans are discussed by CoC leadership during Board meetings or Executive Committee sessions. While HUD requires the CoC to review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS, the HMIS Lead is a necessary partner in this process as the administrator and manager of the HMIS.
4.2	Does the HMIS Lead actively support the CoC in the development and implementation of a data-sharing and consent framework that facilitates the sharing of client records based on applicable federal, state, and local statutes and the business needs (such as	Yes No		The CoC should review data-sharing needs across the CoC to support care coordination, eligibility determination, and other uses of data-sharing to support the improved operation of the CoC. The CoC should also review the steps that the HMIS Lead has taken to implement privacy plans and policies, relevant agency agreements, and HMIS data-sharing and privacy configuration documentation.	1: The HMIS Lead and CoC should engage in a review of privacy policies and HMIS data-sharing functionality to ensure practices align with data-sharing and privacy policies, and collaboratively communicate any changes as a result of the review to all HMIS stakeholders. 2: The HMIS Lead and CoC should review the programs and services provided by all HMIS participating agencies and determine the applicability of federal, state, and local privacy regulations. 3: The HMIS Lead and CoC should plan for future data-sharing needs—including data matching with other source systems and enhanced data-sharing for coordinated entry purposes—and update privacy and

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	coordinated entry) of the CoC?				data-sharing policies and procedures as necessary.
4.3	Does the HMIS Lead actively manage data-sharing settings by end users, programs, projects, and agencies to appropriately support data-sharing in the HMIS implementation in accordance with the CoC's HMIS Privacy Plan?	Yes No		The CoC should review both privacy policies and procedures, HMIS sharing configurations, and any applicable data-sharing settings (such as user roles or agency sharing groups) in the HMIS to ensure that the requirements of the HMIS privacy plan have been correctly operationalized. The CoC should further review agreements and forms on file to ensure that only authorized HMIS end users have been provided system access.	1: The HMIS Lead and CoC must ensure that local control to manage data-sharing settings is available to the HMIS Lead, and that data-sharing settings are appropriate based on agency programs and user access rights and privileges. 2: The HMIS Lead should coordinate with the CoC to review privacy policies and current business needs for data-sharing in the HMIS implementation, and update access rights and privileges as needed. 3: The CoC and HMIS Lead should implement documentation and recordkeeping protocols to clearly and consistently track signed forms and agreements that ensure all privacy and data-sharing requirements are communicated to HMIS end users.
4.4	Does the HMIS Lead work collaboratively with the CoC to define data ownership policies both at the individual and household level as well as at the HMIS implementation level, to account for scenarios related to client revocation of consent or for	Yes No		The CoC should review the HMIS privacy plan and policies and procedures and review specific use cases for how data is managed, including addressing data ownership by the CoC and HMIS participating agencies.	1: The CoC and HMIS Lead develop written policies and procedures to determine CoC data ownership over the combined data within the HMIS, and HMIS participating agency data ownership over the specific data provided to HUD to meet reporting requirements. 2: The CoC and HMIS Lead should incorporate language into the contract with the HMIS Software Vendor regarding ownership of HMIS data for the purposes of data transfer, import, and export. 3: The CoC and HMIS Lead should document the policies and procedures for data ownership at the individual or household level, including the provision of

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	HMIS Software Vendor change?				client data to the client from whom the data was first collected, and the management of data in relation to the revocation of consent to share data in the HMIS.
4.5	Does the HMIS Lead monitor HMIS-participating agencies and HMIS end users for electronic compliance with the CoC's HMIS security plan, such as user account management and password resets, system inactivity, internet browser security, firewall protections, and antivirus programs?	Yes No		The CoC and HMIS Lead should jointly review any HMIS security monitoring tools, processes, and findings, and ensure that the HMIS Lead follows a transparent process for either identifying security risk or conducting HMIS security monitoring processes. The CoC and HMIS Lead should become familiar with guidance related to information security provided by the HMIS Software Vendor, as well as risk management frameworks, such as NIST Special Publication 800-37 (Risk Management Framework for Information Systems and Organizations).	<p>1: The HMIS Lead and CoC should develop a report of system access to ensure that HMIS information is secure and confidential in accordance with the CoC's HMIS security plan.</p> <p>2: The HMIS Lead and CoC should routinely monitor system access and implement corrective actions when necessary.</p> <p>3: The HMIS Lead and CoC should set standards for ensuring HMIS access is regular, used for legitimate reporting and care coordination purposes, and that only authorized users are accessing the system.</p> <p>4: The CoC and HMIS Lead should develop and implement information security policies and risk assessments that address risks at the levels of the organization, individual, and systems, which may include the use of multi-factor authentication, revised roles and responsibilities across HMIS stakeholders by user type (end user or administrator), and continuous monitoring of data-sharing groups.</p>
4.6	Does the HMIS Lead monitor HMIS participating agencies and HMIS end users for physical compliance with	Yes No		The CoC and HMIS Lead should jointly review any HMIS security monitoring tools, processes, and findings, and ensure that the HMIS Lead follows a transparent process for	<p>1: The CoC and HMIS Lead should ensure that on-site monitoring of HMIS participating agencies and HMIS end users incorporates components of physical security policies and procedures.</p> <p>2: The CoC and HMIS Lead should develop and deliver HMIS security training as</p>

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	the CoC's HMIS security plan, and is the monitoring process effective at decreasing security issues related to physical compliance?			either identifying security risk or conducting HMIS security monitoring processes. The CoC should assess the HMIS Lead's security monitoring tools and processes to ensure physical areas meet compliance, such as workstation security protections, hard copy file management protocols, and device locks and security cables.	indicated by the findings of the HMIS security monitoring process.
4.7	Does the HMIS Lead provide quality improvement strategies, training and capacity building opportunities, and corrective action planning to agencies and end users based on the findings of the HMIS end user monitoring process regarding privacy, security, and data quality?	Yes No		The CoC should review the HMIS training curricula that is provided by the HMIS Lead to HMIS participating agencies and end users and collect qualitative and quantitative information regarding the appropriateness and effectiveness of the quality improvement strategies and training opportunities provided by the HMIS Lead.	1: The CoC and HMIS Lead should comprehensively review all training curricula and resources and HMIS policies and procedures to ensure appropriate training is provided to HMIS stakeholders on HMIS requirements prescribed by HUD and approved by the CoC. 2: The CoC and HMIS Lead should review staffing levels at the HMIS Lead that are dedicated or available to develop and deliver training and capacity-building opportunities for HMIS end users. 3: The CoC and HMIS Lead should collaboratively develop a strategic plan that accounts for any increases in HMIS participation or new HMIS Software functionality and develop training and capacity building opportunities to maximize the features and functionality of the HMIS implementation.
4.8	Does the HMIS Lead work collaboratively with the CoC to	Yes		The CoC and HMIS Lead should jointly review the HMIS data quality plan and review any data quality	1: The CoC and HMIS Lead should review HUD's CoC Data Quality Brief and Data Quality Management Program resources,

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	establish standards for each component of data quality and monitoring to these standards: completeness, accuracy, timeliness, and consistency?	No		monitoring findings as a result of the HMIS Lead’s data quality monitoring process to determine the overall effectiveness of the data quality monitoring process.	and incorporate strategies and operational guidance into local data quality plans. 2: The CoC and HMIS Lead should develop and implement specific data quality standards for each component of data quality, according to program or project type, or other locally defined criteria.
4.9	Does the HMIS Lead’s data quality monitoring process lead to improvements in data quality performance related to completeness, accuracy, timeliness, and consistency?	Yes No		The CoC and HMIS Lead should jointly review the HMIS data quality plan and review any data quality monitoring findings as a result of the HMIS Lead’s data quality monitoring process to determine the overall effectiveness of the data quality monitoring process.	1: The CoC and HMIS Lead should review HUD’s CoC Data Quality Brief and Data Quality Management Program resources and incorporate strategies and operational guidance into local data quality plans. 2: The CoC and HMIS Lead should review and revise the data quality management program or monitoring plan for comprehensiveness and clarity. 3: The CoC and HMIS Lead should develop or update any enforceable agreements—such as a written HMIS participation agreement—to specify data quality standards are requirements.
4.10	Does the HMIS Lead monitor HMIS stakeholders (such as end users) to ensure that the privacy plan, security plan, and data quality for the HMIS have been accurately implemented and operationalized, and has data	Yes No		The CoC reviews the HMIS end user monitoring tool used by the HMIS Lead and CoC data leadership to ensure 1) consistent and objective monitoring guidelines and 2) a comprehensive scope of monitoring that includes assessment and evaluation of privacy, security, and data quality, and that accurately reflects the HMIS standards established in the	1: The CoC should ensure that the HMIS Lead has funding and staffing capacity to adequately support the development and implementation of improvement strategies, training and capacity building opportunities, and corrective action planning. 2: The HMIS Lead should ensure that its staffing structure includes roles and responsibilities for technical training, monitoring and evaluation, and quality improvement.

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	quality metrics improved during the monitoring period?			approved HMIS policies and procedures. The CoC should review data quality indicators to determine whether data quality is improving as a result of the HMIS Lead's approach to monitoring.	3: The CoC and HMIS Lead revise the HMIS plans, policies, and standards based on monitoring findings to increase HMIS performance and the use of data throughout the CoC.
4.11	Does the HMIS Lead have escalation protocols in place to inform leadership from HMIS participating agencies and the CoC when non-compliance with any HMIS privacy, security, or data quality plans is identified through the monitoring process?	Yes No		The CoC and HMIS Lead review escalation protocols based on risk, severity, or impact. The CoC should consider whether escalation protocols sufficiently account for monitoring findings or risk assessments across privacy, security, and data quality components.	1: The CoC and HMIS Lead should establish an escalation protocol or process that is inclusive of HMIS stakeholders, and engages agency and CoC leadership depending on the severity of non-compliance findings 2: The CoC and HMIS Lead should establish a notification process or communication plan to inform clients of security breaches involving their HMIS records 3: The CoC and HMIS Lead should identify common indicators of risk across privacy, security, and data quality, and frequently assess and evaluate these indicators as needed.

Section 5: HMIS Software Vendor Monitoring. In most HMIS implementations, the HMIS Lead is also the holder of the contract with the HMIS vendor or fiduciary on behalf of the CoC. While the CoC is responsible for designating the HMIS for the CoC’s geographic area, the HMIS Lead is typically the entity that has the most knowledge of the HMIS software and services provided to the CoC by the HMIS vendor. HUD also recommends that the HMIS Lead be included in planning for managing data in the coordinated entry process, as the HMIS Lead can provide information about HMIS capacity and limitations and help identify which data system will best support coordinated entry implementation. CoCs and HMIS Leads may benefit from the development of Software Requirement Specification (SRS) documents, which detail software functionality and performance standards for all HMIS users. CoCs and HMIS Lead should ensure that all contractual terms and conditions are unambiguous, measurable, and enforceable.

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5.1	<p>Does the HMIS Lead monitor the HMIS software to ensure that the HMIS meets all data and functionality requirements as prescribed by HUD, including:</p> <p>1) The HMIS collects all current HMIS data elements and response categories;</p> <p>2) The HMIS has the ability to un-duplicate client records;</p> <p>3) The HMIS is compliant with HUD HMIS programming specifications and HMIS CSV Format Specifications; and</p> <p>4) The HMIS produces all reports required by HUD</p>	<p>Yes</p> <p>No</p>		<p>The CoC should obtain and review any documentation from the HMIS Lead and the entity that holds the contract with the HMIS Software Vendor to review all HMIS monitoring documentation and findings.</p> <p>The CoC should identify expertise to support a review of data standards and programming specifications in conjunction with HUD HMIS guidance and HMIS Lead monitoring documents to ensure compliance with HUD’s HMIS Data Standards and reporting requirements. Other contracts, software requirements, and enforceable agreements should also be reviewed and used as the monitoring baseline, as applicable and appropriate.</p>	<p>1: The CoC and HMIS Lead should review all available HUD HMIS requirements and the contract with the HMIS Software Vendor for compliance with all terms and conditions as prescribed by HUD, the CoC, and the contract holder or fiduciary.</p> <p>2: The CoC and HMIS Lead should clarify any HMIS regulatory questions with CoC data leadership, the HMIS Software Vendor, and HUD (via the HUD Exchange Ask A Question portal).</p> <p>3: The HMIS Lead should analyze, on at least an annual basis and at each major software release, the data elements collected by the HMIS software and determine whether they include all data elements currently required by HUD.</p> <p>4: The CoC and HMIS Lead should ensure communication or escalation protocols are in place to report any technical, functional, or reporting issues to CoC leadership and to the HMIS Software Vendor and reference the contract for remediation options in conjunction with the CoC or contract holder.</p>

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	and federal partners who require HMIS participation for programs?				<p>5: The CoC and HMIS Lead should conduct joint monitoring of the HMIS Software Vendor by using HUD’s HMIS Software Vendor Monitoring Tool and HMIS Software Vendor Capacity Checklist, locally developed monitoring processes, and the contract with the HMIS Software Vendor.</p> <p>6: The HMIS Lead should validate the report types generated by the HMIS software on a regular basis and at each major software release, and determine whether they include all reports required by HUD and federal partners who require HMIS participation.</p>
5.2	Does the HMIS Lead regularly monitor the HMIS Software Vendor and utilize incentives or penalties—as permitted by the CoC and defined in the contract—to ensure compliance with all contractual terms and conditions between the community and vendor?	Yes No		The CoC and HMIS Lead jointly review any monitoring documentation— such as corrective action plans or monitoring findings—to ensure that the HMIS Software Vendor is being monitored to the terms and conditions of the contract, and utilize HUD’s HMIS Software Vendor Monitoring Tool to develop measurable baselines of HMIS Software Vendor Performance and compliance with contractual terms and conditions.	<p>1: The HMIS Lead should compare HMIS vendor performance against all measurable contractual terms and conditions on a regular basis, which may range from annual performance and compliance monitoring to monthly assessments prior to remitting payment for services.</p> <p>2: The HMIS Lead and CoC should jointly update their local HMIS Software Vendor monitoring tool and process to monitor and evaluate defined measurable contractual terms and conditions, service level agreements, and escalation protocols related to HMIS vendor performance.</p> <p>3: The HMIS Lead should immediately report any discrepancies to the software vendor and CoC.</p> <p>4: The HMIS Lead should support efforts by the CoC to refine the HMIS Software Vendor contract to ensure</p>

Question ID	Improvement Assessment Question	Response	Response Justification	How to Monitor	Improvement Strategies
					clearly defined and measurable terms and conditions.
5.3	Does the HMIS Lead work collaboratively with CoC leadership and HMIS stakeholders to review vendor monitoring findings and performance measures?	Yes No		The CoC should ensure a transparent review process with HMIS stakeholders regarding HMIS Software Vendor monitoring findings and ensure appropriate feedback loops and accountability mechanisms exist to implement action plans or improvement strategies.	<p>1: The CoC and HMIS Lead collaboratively define performance measurement requirements of the HMIS Software Vendor and work to incorporate requirements into contracts and enforceable agreements.</p> <p>2: The CoC and HMIS Lead use performance-based contracting approaches to assess the quality and cost-effectiveness of both the HMIS software and any services provided to the CoC and HMIS Lead by the HMIS Software Vendor.</p> <p>3: The HMIS Lead and CoC (or contract holder or fiduciary) should ensure that specific and measurable terms and conditions are incorporated into the contract with the HMIS Software Vendor during the next opportunity for contract negotiation and execution.</p>

Section 6: Training, Customer Service, and End User Support Services. Depending on the administrative and operational structure of the HMIS implementation, the HMIS Lead may be operating the CoC’s HMIS service desk, providing technical support to end users, and developing and delivering training and learning opportunities to enhance the capacity of HMIS end users. The CoC, HMIS Lead, and other HMIS stakeholders have an interest in ensuring that service desk requests are promptly and comprehensively addressed, and that training and technical assistance activities provided by the HMIS Lead to HMIS end users are effective, relevant, and lead to increased knowledge retention and understanding of HMIS and the technical and functional capabilities that the software offers. The CoC should clearly define the training method or approach across the HMIS implementation and define any initial and continuing training requirements in written agreements.

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6.1	Does the HMIS Lead require new end users to complete HMIS training prior to allocating HMIS end user licenses or granting system access, and provide appropriate training on a frequent basis?	Yes No		The CoC should review available data quality reports, service desk tickets, and other qualitative and quantitative information to determine the frequency and effectiveness of HMIS end user trainings as provided by the HMIS Lead. The CoC should also monitor to ensure that all HMIS end users have documentation verifying that new user trainings have been completed, as defined in the CoC’s approved HMIS policies and procedures.	1: The CoC and HMIS Lead should ensure that HMIS Policies and Procedures contain a provision requiring that new end users complete HMIS training to gain access to the system. 2: The CoC and HMIS Lead should ensure that HMIS training for new end users is provided regularly and with the following characteristics: 1) through a modality that is appropriate for the size and geography of the CoC, 2) in a manner that addresses both HUD requirements (such as HMIS data standards) and local requirements of privacy, security, and data quality, and 3) that accounts for program-specific data collection or workflow requirements.
6.2	Does the HMIS Lead incorporate pre-test and post-test assessments to measure knowledge retention and the efficacy of training sessions?	Yes No		The CoC should review pre-test and post-test assessments (if available) to ensure 1) applicability to the training material presented by the HMIS Lead to HMIS end users and 2) increases in post-test results from participants to ensure effective delivery of HMIS end user training material.	1: The CoC and HMIS Lead should ensure that HMIS Policies and Procedures contain a provision requiring that end users complete HMIS training pre- and post-tests to gain or retain access to the system. These surveys serve to consistently measure knowledge retention and the effectiveness of HMIS end user training sessions.

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					2: The CoC and HMIS Lead should define through written HMIS Policies and Procedures any training completion requirements or minimum post-test scores that must be attained prior to grant licenses or system access to HMIS end users.
6.3	Does the HMIS Lead offer regularly occurring training sessions as well as on-demand trainings, technical assistance, and/or individualized or group learning opportunities based on identified training needs or at the request of HMIS end users, including remedial trainings for new end users and advanced trainings for experienced end users?	Yes No		The CoC should review the HMIS training curriculum developed and delivered by the HMIS Lead to ensure appropriateness for the training needs of HMIS end users in the CoC. The CoC should further assess feedback loops, survey responses, and other information to ensure that training curricula is appropriate for the type of HMIS end user, that the material delivered is relevant and accurate, and that the HMIS Lead appropriately prioritizes the development and delivery of HMIS end user training among its other roles and responsibilities.	1: The HMIS Lead, in consultation with the CoC, should develop and implement a training plan or curricula for HMIS end users that includes frequent training sessions at regular intervals, different levels of training and topics for both new end users and advanced end users, and provides flexibility as needed for the CoC such as conducting on-demand trainings or technical assistance in a physical or virtual manner that is most appropriate for the needs of HMIS end users. 2: The CoC and HMIS Lead should regularly assess the training needs of HMIS end users— by reviewing service desk tickets or requests for technical assistance—and use the results to design curricula that meets HMIS end users’ needs. 3: The HMIS Lead should periodically measure the effectiveness of HMIS end user training and technical assistance through surveys and other data collection methods, and share the results with the CoC
6.4	Does the HMIS Lead solicit feedback from HMIS stakeholders	Yes		The CoC should review surveys, forms, and meeting minutes to determine whether feedback loops are	1: The CoC and HMIS Lead defines or clarifies the specific administrative, management, and operational roles and responsibilities of the HMIS Lead,

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	on the administration, management, and operation of the HMIS implementation to identify areas for improvement, and incorporate feedback into training or capacity building opportunities?	No		provided by the HMIS Lead and compare feedback to available training curricula to ensure alignment of end user training needs and the training material that is available.	and solicits targeted feedback on the topics for which the HMIS Lead is responsible. 2: The HMIS Lead develops and administers surveys, scorecards, focus groups, interviews, or other feedback mechanisms to measure the effectiveness of HMIS Lead services and to identify areas for improvement. 3: The CoC and HMIS Lead incorporate feedback loops and communication standards into applicable contracts, statements of work, or MOUs and other agreements to ensure the HMIS Lead is provided with improvements planning opportunities.
6.5	Does the HMIS Lead adequately respond to service desk tickets (timeliness and comprehensiveness of the response), as determined in the MOU, contract, or statement of work and in accordance with any defined escalation protocols?	Yes No		The CoC and HMIS Lead should review performance reports related to the timeliness of service desk ticket responses, including escalation of priority tickets, timeliness standards, and other performance metrics.	1: The CoC and HMIS Lead should continuously measure its service desk performance against metrics or expectations defined in written agreements through the MOU, contract, or statement of work between the HMIS Lead and CoC. 2: The CoC and HMIS Lead should review roles and responsibilities across the HMIS implementation related to training and HMIS oversight, including roles and responsibilities of HMIS participating agency leadership and HMIS Software Vendor, and identify opportunities for increased cost-effectiveness, responsiveness, or efficiency in the management of service desk support.
6.6	Does the HMIS Lead provide accurate and timely	Yes		The CoC should evaluate timeliness and accuracy of communication provided to	1: The HMIS Lead should collaborate with the CoC to define standards for

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	communication to HMIS stakeholders regarding changes to HUD's HMIS requirement or updates to the HMIS implementation by the vendor?	No		HMIS stakeholders by the HMIS Lead, accounting for 1) when the information was first made available, when it was accessed by the HMIS Lead, and when it was disseminated to local HMIS stakeholders and 2) the accuracy, relevance, and effectiveness of HMIS communications, such as how and when Listserv messages are provided to HMIS end users.	<p>accurate and timely communication with HMIS stakeholders.</p> <p>2: The CoC and HMIS Lead should ensure that communication with HMIS end users or other stakeholders is timely and relevant, and supports the implementation of any new requirements or standards through the use of how-to guides or other practice examples.</p> <p>3: The CoC and HMIS Lead use the CoC's HMIS or data committee to identify upcoming changes to HUD's HMIS requirements or data standards, or technical or functional updates provided by the HMIS Software Vendor, and develops and implements a change management plan with appropriate resources, training, and communication strategies.</p>

Section 7: Data Analysis and Reporting. Reporting HMIS data to HUD and to the CoC is an essential function of the HMIS Lead. These reports are not only requirements of funders, but can help CoC and HMIS leadership improve the homeless crisis response system by identifying population trends, measuring performance across systems, programs, agencies, and projects, and informing the resource allocation process. Data analysis and reporting needs vary widely across CoCs, based on how the HMIS implementation is utilized, but the HMIS Lead should ensure not only high-quality data in the HMIS but also support how the data is used. While many stakeholders are involved in ensuring that the HMIS has high quality, accurate, and timely data, the HMIS Lead is often well-positioned to generate custom reports, submit mandatory reports to HUD or other funders, and provide analysis and interpretation of the data to improve the operation of the CoC.

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7.1	Does the HMIS Lead work collaboratively with the CoC to review HUD and federal partner reports, and address any data quality or report validation concerns, prior to report submission?	Yes No		The CoC should review the number, types, and frequency of reports submitted to HUD and federal partners and determine 1) whether there is a process to review data quality prior to report submission with agency and/or CoC leadership and 2) whether that process was followed.	1: The CoC and HMIS Lead develop and implement a specific policy and review process detailing the responsibilities of each entity regarding the review of HUD and federal partner reports. 2: The CoC, HMIS Lead, and other HMIS stakeholders proactively review data quality and report validation concerns of HUD and federal partner reports in advance of submission and takes action to correct deficiencies. 3: The CoC and HMIS Lead implement automated data quality or report validation review processes to improve the report review and submission process.
7.2	Does the HMIS Lead work collaboratively with the CoC to ensure that HMIS bed and unit inventories correspond with the Housing Inventory Count (HIC) and that all projects are accurately typed?	Yes No		The CoC should collect qualitative (such as program design) and quantitative information (such as bed and unit inventories and budget information) from the recipient or subrecipient leadership, and compare project descriptor and project inventory information with the project information available in HMIS.	1: The CoC and HMIS Lead develops, implements, and updates a specific policy or project descriptor management plan that details the responsibilities of each entity regarding HMIS bed and unit inventories. 2: The HMIS Lead, in consultation with the CoC, manages project descriptor data elements and reviews them for accuracy at least annually, or more frequently if needed to ensure that reporting is accurate.

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7.3	Does the HMIS Lead provide timely and accurate performance data to the CoC to support agency and project evaluation and the annual project ranking and selection process?	Yes No		The CoC should review its data and reporting needs for project performance evaluation and the CoC competition rating and ranking process, and measure 1) the HMIS Lead's timeliness to report requests, 2) the accuracy and consistency of reports provided by the HMIS Lead, and 3) the overall efficiency and quality of communication with the HMIS Lead for defining report parameters and receiving completed reports. The CoC should reference any HMIS Policies and Procedures; agency and project performance data reports; rating and ranking or selection process policies and procedures, and relevant measures of the HMIS Lead's performance.	1: The CoC should develop and implement a specific policy detailing the responsibilities of the HMIS Lead to provide data to the CoC. The policy should include mutually agreed-upon timelines, document standard and custom reporting needs, and track changes in performance reports and the project ranking criteria over time. 2: The CoC and HMIS Lead should collaboratively access and review project performance data in advance of the annual project rating and ranking or selection process. 3: The CoC and HMIS Lead institute ongoing data quality monitoring processes to ensure that project performance reports can be developed with minimal effort to clean or correct historical data. 4: The HMIS Lead develops a report library of common project-level performance reports for use across the CoC.
7.4	Does the HMIS Lead provide timely and accurate reports to the CoC and other HMIS stakeholders as required or requested, in accordance with any reporting or evaluation			The CoC and HMIS Lead should review any reporting processes in conjunction with HMIS data analysis and reporting performance metrics, such as length of time to develop ad hoc reports, the number of ad hoc report requests received by HMIS stakeholders, and	1: The HMIS Lead and CoC create annual schedule of anticipated data needs that includes reporting deadlines across project operating years, and annual reporting deadlines set by HUD and federal partners, as well as other locally determined reporting deadlines and known data needs. 2: The CoC and HMIS Lead regularly monitors HMIS data quality in

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	protocols, policies, and procedures?			the priority of report requests by funder requirement or other data use.	<p>conjunction with HMIS participating agency stakeholders, and generates draft reports prior to submission deadlines for review and correction by HMIS participating agencies.</p> <p>3: The CoC and HMIS Lead develop and implement a policy and process to manage ad hoc or custom report requests, including defined timelines, standard definitions for reporting parameters, and a transparent prioritization process for custom report requests that includes CoC-wide or agency-specific funding, policy, and operational criteria.</p> <p>4: The CoC and HMIS Lead develop reporting dashboards or publicly available reporting templates that provide information to CoC and HMIS stakeholders faster and more efficiently than developing custom reports in response to ad hoc data requests.</p> <p>5: The CoC and HMIS Lead collaboratively develop evaluation frameworks and performance assessment approaches for project-, agency-, and system-level monitoring and evaluation processes, including evaluating coordinated entry performance in consultation with the CoC's coordinated entry management entity.</p>
7.5	Does the HMIS Lead appropriately support data literacy efforts with CoC stakeholders, including data	Yes No		The CoC reviews HMIS guidance developed by the HMIS Lead to ensure that report manuals, end user guides, and terminology glossaries or data	1: The CoC and HMIS Lead should review HUD's Data TA Strategy to Improve Data and Performance and incorporate strategies into local HMIS policies, procedures, and plans.

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	documentation, data interpretation, and report management for both Point-in-Time Counts and longitudinal analyses?			dictionaries are clear and consistent and support data use across the CoC.	<p>2: The CoC and HMIS Lead work to identify the capacity for the use of data, including the CoC Data Committee, HMIS Lead staff, or other community partners with data expertise to increase data literacy across the CoC, such as colleges and universities or policy and research institutes.</p> <p>3: The HMIS Lead should develop or update data documentation and reporting guidance to enhance data availability and standardization of reporting processes.</p> <p>4: The HMIS Lead and CoC should continue building capacity for enhanced strategic and prospective data analyses and reporting.</p>

Section 8: Staff Management and Capacity. Attaining a stable, quality, and appropriate staffing structure is crucial for quality service delivery by an HMIS Lead to the CoC, HMIS end users and participating agencies, and other HMIS stakeholders. CoCs and HMIS implementations vary in size, complexity, and use, so CoCs should collaborate with their HMIS Leads to determine transparent methods of measuring appropriateness of HMIS Lead staffing. Some CoCs may delegate certain tasks to other HMIS stakeholders to effectively use the capacity of the HMIS Lead. Others may choose to target a desired portion of total CoC Program funding for the management and operation of the HMIS implementation by the HMIS Lead. Other CoCs and HMIS Leads may choose to base staffing models on a ratio of HMIS end users to ensure growth in the HMIS Lead staffing structure in accordance with the growth and demands of the system. It is crucial that CoCs define the specific roles and responsibilities of the HMIS Lead through written agreements or contracts so that the HMIS Lead’s performance can be appropriately assessed and that any roles and responsibilities that the HMIS Lead shares with the CoC, HMIS participating agencies and end users, and the HMIS Software Vendor, are clearly communicated and transparently documented.

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8.1	Does the HMIS Lead maintain a staffing structure that meets the needs of the CoC, based on the size of the HMIS implementation and the roles and responsibilities that have been assigned to the HMIS Lead?	Yes No		The CoC should reference the HMIS governance charter and written agreements to establish the baseline that the HMIS Lead is specifically responsible for attaining. The CoC should further review any unfilled positions within the HMIS Lead, identify how long those positions have been vacant, and the action steps that the HMIS Lead is taking to meet staffing expectations.	<p>1: The CoC and HMIS Lead review the HUD HMIS Budget and Staffing Toolkit for strategies and action steps to improve the performance of the HMIS Lead, or revise the HMIS Lead’s staffing model, structure, or capacity to appropriately meet the HMIS needs of the CoC.</p> <p>2: The CoC and HMIS Lead should review organizational staffing structure, job descriptions, and assigned duties to HMIS Lead staff to ensure alignment of HMIS Lead capacity and CoC needs regarding administration and operation of the HMIS implementation.</p> <p>3: The HMIS Lead updates job descriptions, positions or titles, and staffing structure as necessary to ensure that staff roles and responsibilities are clearly and accurately assigned and that the roles and responsibilities are effectively carried out by designated staff.</p> <p>4: The CoC and HMIS Lead review and revise any contracts or statements of work that define the requirements of the HMIS Lead to inform hiring and</p>

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					staffing practices by the HMIS Lead across administrative, management, operational, and reporting domains.
8.2	Does the HMIS Lead provide capacity building opportunities to staff members as appropriate, such as training opportunities, conference attendance, and professional development courses?	Yes No		The CoC should review any professional development curricula from the HMIS Lead, and assess for frequency, appropriateness, and cost-effectiveness. The CoC and HMIS Lead should be able to mutually understand how professional development opportunities offered to staff lead to positive impacts for building HMIS capacity.	<p>1: The CoC and HMIS Lead provide training and capacity building opportunities through conference attendance or other professional development forums, such as national HMIS training events, data analytic conferences, and attendance at HMIS System Administrator webinars, and other training/capacity building events.</p> <p>2: The HMIS Lead develops and implements a formal staff development plan that includes career tracks, goal plans, and individualized and group learning opportunities.</p> <p>3: The CoC and HMIS Lead make resources available to support capacity-building opportunities, such as travel stipends or allocating staff time to be used for professional development opportunities.</p> <p>4: The CoC and HMIS Lead should review the HMIS Lead Budget and Staffing Toolkit and incorporate organizational capacity building strategies and formal training curriculum development into the HMIS Lead’s management practices.</p>
8.3	Does the HMIS Lead appropriately prioritize HMIS Lead roles and responsibilities? If the HMIS Lead also	Yes No		The CoC reviews organization budgets and staffing plans provided by the HMIS Lead in the context of required roles and responsibilities assigned to the HMIS Lead. A	1: The CoC and HMIS Lead review the HUD HMIS Budget and Staffing Toolkit for strategies and action steps to improve the performance of the HMIS Lead.

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	<p>provides other services or business functions, do they demonstrate adequate funding and resource capacity to recruit and retain staff that meet the HMIS management and data reporting needs of the CoC?</p>			<p>review of publicly available documents for completeness and accuracy (such as active links on the HMIS Lead’s website) may be used to inform this monitoring component. The CoC may also pull from stakeholder surveys, focus groups, or other qualitative sources to help evaluate the HMIS Lead’s capacity to recruit and retain staff that meet the CoC’s needs.</p>	<p>2: The CoC and HMIS Lead develop or define core functions of the HMIS Lead in the context of other services provided by the HMIS Lead organization, and incorporate accountability mechanisms into agreements between the CoC and HMIS Lead to ensure appropriate prioritization of HMIS Lead services, roles, and responsibilities.</p> <p>3: The CoC and HMIS Lead identify and allocate funds that support professional development or capacity development for staff and themselves to enhance data management and analytical skills to maintain and develop a highly skilled workforce.</p>

Section 9: Strategic Planning and HMIS Growth. Developing a strategic plan or defining a set of goals and objectives for the HMIS Lead and the HMIS implementation at large can be helpful to determine resources, strategies, and structures to help operationalize a short-, medium-, and long-term plan as a way to meet these needs. Enhanced HMIS functionality or reporting capabilities may support new funding opportunities or other initiatives to help prevent and end homelessness. Similarly, diverse funding sources can ensure a broad base of stakeholder involvement and limit the risk posed by possible decreases in any single funding source. In addition, strategic planning can bring increased transparency and enhanced collaboration to the CoC’s vision for HMIS by aligning the CoC’s data needs with the resources and capacity of the HMIS Lead.

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9.1	Does the HMIS Lead work collaboratively with the CoC to develop a strategic plan that sets goals for increases in HMIS participation, funding, and the capacity of HMIS stakeholders?	Yes No		The CoC should review any HMIS strategic planning documents and the specific responsibilities that have been assigned to the HMIS Lead, and assess the HMIS Lead’s effectiveness at meeting identified goals and objectives.	<p>1: The CoC and HMIS Lead should develop a strategic planning framework that 1) identifies stakeholders and organizational capacity, 2) provides organizing principles and a vision for HMIS and data to end homelessness in the CoC, 3) prioritizes goals, objectives, activities, and tasks, and 4) determines resources for plan implementation and measurement.</p> <p>2: The HMIS Lead and CoC should develop benchmarks for increasing HMIS participation by project type and funding source, or other locally defined HMIS priorities.</p> <p>3: The CoC and HMIS Lead should review the strategies and characteristics of the SNAPS Data TA Strategy to Improve Data and Performance and implement relevant strategies and work to attain characteristics identified in the Strategy.</p>
9.2	Does the HMIS Lead work collaboratively with the CoC to provide incentives to increase HMIS participation for agencies that are not required to	Yes No		The CoC should assess bed coverage and HMIS participation rates and review the action steps that have been taken by HMIS stakeholders to increase HMIS participation.	<p>1: The CoC and HMIS Lead should identify both financial and non-financial resources to incentivize increased HMIS participation, or otherwise expand the availability of incentives such as discounted rates on user licenses, increased training and</p>

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	participate in HMIS as a condition of their grant, and do these incentives lead to increased HMIS participation?				<p>end user support, and enhanced reporting capabilities.</p> <p>2: The CoC and HMIS Lead should codify the incentive structure in agreements or MOUs (if necessary) and plan strategically for the continued resourcing of incentives.</p>
9.3	Does the HMIS Lead work collaboratively with the CoC to diversify funding sources for HMIS across federal, state, local, and private or philanthropic organizations?	Yes No		The CoC should review any HMIS strategic planning and budgeting documents and assess the effectiveness of the HMIS Lead in supporting the implementation of funding diversification strategies.	<p>1: The CoC and HMIS Lead review the HMIS Budget and Staffing Toolkit to assess funding and resourcing strategies across multiple funding sources, and collaboratively review operating budgets and leverage funding opportunities to increase the number of funding sources that are used to support the HMIS Lead.</p> <p>2: The CoC and HMIS Lead assess user fees or fee-for-service structures across funding sources and HMIS participating agencies to diversify HMIS funding.</p> <p>3: The CoC and HMIS Lead develop an HMIS strategic plan that includes ideal funding or staffing targets which guides to identification and implementation of funding strategies.</p>
9.4	If HMIS participation fees or service charges are collected by the HMIS Lead from HMIS Participating Agencies, are the fee structures, collection mechanisms, and use of fees clearly	Yes No		The CoC should review the available budget and planning documents, accounting ledgers and balance sheets, and other documentation provided by the HMIS Lead to ensure appropriate collection and use of revenue generated by HMIS participation fees.	<p>1: The CoC and HMIS Lead should ensure that appropriate agreements or memoranda of understanding are in place to determine the cost of licenses borne by HMIS participating agencies.</p> <p>2: The CoC and HMIS Lead should regularly review fee structures and revenue generated by participation fees to ensure that 1) revenue is sufficient and 2) participation fees are not a</p>

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	documented and used to support costs and expenses of the HMIS, or otherwise reinvested to enhance the HMIS?				<p>barrier to increased HMIS participation.</p> <p>3: The CoC and HMIS Lead should monitor HMIS Participating Agencies to ensure that participation fees are paid for with eligible sources of funding.</p> <p>4: The CoC and HMIS Lead should review how HMIS participation fees support the HMIS Lead as part of a strategic funding diversification plan.</p>
9.5	Does the HMIS Lead work collaboratively with the CoC to enhance the CoC's use of HMIS to support coordinated entry and by-name list functionalities?	Yes No		The CoC should review Section III.E of HUD Notice CPD-17-01 (Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System) and any local coordinated entry data management requirements for which the HMIS Lead is responsible, and evaluate the HMIS Lead's performance.	<p>1: The CoC and HMIS Lead should assess and document gaps in current coordinated entry processes and reporting needs.</p> <p>2: The CoC and HMIS Lead should determine whether new coordinated entry functionality is needed in HMIS and, if so, begin a cost-effective analysis and development of requirements in conjunction with HMIS stakeholders and the HMIS Software Vendor.</p> <p>3: The CoC, HMIS Lead, and coordinated entry management entity should review coordinated entry project set up and data collection requirements in conjunction with the HMIS Vendor to ensure the appropriate use of software functionality and accurate workflows.</p>