Present:

1. Welcome and Public Comment

2. Committee Administrative Business
   - Next Meeting: 9-11AM on Wednesday June 19 at 101 Callan Ave Suite 230, San Leandro CA 9457.
   - Selecting Co-Chairs

3. Updates
   - HMIS Work Plan
     i. Find a current version of the HMIS workplan: [HMIS Oversight Committee (Public Access)]
   - Document upload feature
   - Services Options
   - User Licenses
   - HMIS TA

4. Planning for New Clarity Feature: Contacts Tab

5. Planning for HMIS Lead Monitoring
   - Prepare for this conversation by looking at the MOU between CoC Committee and HCD, “Roles and Responsibilities of CoC and HMIS Lead,” and, “Summary of HMIS Functions and Responsibilities.”

6. Closing and Next Steps
Roles and Responsibilities of CoC and HMIS Lead

CoC Responsibilities:
The CoC is the primary decision-making entity that is ultimately responsible for the HMIS and must conduct appropriate oversight of the HMIS to ensure that it is compliant with the HMIS Standards and is meeting local needs. Responsibilities include:

- **CoC HMIS Policy Review:** The CoC has final authority to review, revise, and approve all policies and procedures that HMIS Lead is required to develop. Including:
- **CoC Oversight:** CoC oversight of the HMIS is established through a formal process. This process identifies the various entities that contribute to a successful HMIS and documents their responsibilities through a written Governance Charter or Agreement.
- **CoC Monitoring:** The CoC must monitor the HMIS Lead annually. Monitoring of recipients/subrecipients by the CoC is required and HMIS Lead monitoring documentation must be retained for a minimum of 5 years.
- **Enforce HMIS Data Quality Plan:** CoC will need to review and approve the DQ Plan. CoC should also be heavily involved in determining expectations for monitoring and compliance. This work should not fall on the shoulders of just the HMIS Lead Agency.

HMIS Lead Responsibilities:

- Develops plans, policies and procedures on behalf of the CoC including: Data Quality Plan, Security Plan, Privacy Plan
- Program compliance with applicable agreements: Monitoring and enforcing compliance by all CHOs with HUD established HMIS requirements, local policies, and requirements in HMIS Participation Agreement
- Leads HMIS Operation and Management: Reporting, training and technical assistance
- Ensures compliance with functionality standards
- Increasing HMIS Participation
- Eligible costs of the HMIS Lead are defined at 578.57(b) of the CoC Program interim rule

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<tr>
<th>Continuum of Care</th>
<th>HMIS Lead Agency</th>
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<td>• Designates the HMIS Lead and HMIS Vendor</td>
<td>• Leads HMIS Operation and Management</td>
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<td>• Monitors the HMIS Lead and overall data quality</td>
<td>• Develops plans, policies and procedures in coordination with the CoC</td>
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<td>• Reviews, revises, and approves HMIS policies &amp; procedures</td>
<td>• Ensures CHO program compliance with applicable agreements</td>
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<td>• Enforces HMIS Data Quality Plan</td>
<td>• Ensures compliance with functionality standards</td>
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<td>• Ensure the HMIS is administered in compliance with requirements prescribed by HUD.</td>
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MEMORANDUM OF UNDERSTANDING
BETWEEN
ALAMEDA COUNTY HUD CONTINUUM OF CARE
COMMITTEE, (ACTING AS THE CONTINUUM OF CARE
BOARD) AND
ALAMEDA COUNTY DEPARTMENT OF HOUSING AND
COMMUNITY DEVELOPMENT, (ACTING AS THE
HOMELESS MANAGEMENT INFORMATION SYSTEM
(HMIS) LEAD

I. Introduction and Purpose
The Alameda County Continuum of Care (the “CoC”) is the governing body organized to carry out the responsibilities required under HUD’s Homeless Emergency Assistance and Rapid Transition to Housing Continuum of Care Program Interim Final Rule at 24 CFR Part 578.7(b) (the “Interim Rule”), including designating a Homeless Management Information System (HMIS) lead to operate HMIS. In addition, the CoC is responsible for making decisions about HMIS management and administration as required under 24 CFR Part 580, a separate rule establishing regulations for HMIS issued by HUD as part of the implementation of the HEEK Act of 2009. The CoC is responsible for ensuring that the HMIS is operated in accordance with the provisions of the new regulations and other applicable laws (24 CFR Part 580.5).

The Alameda CoC is part of EveryOne Home, a collective impact effort to end homelessness. It is composed of representatives of organizations including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons. The HUD Continuum of Care Committee (the “CoC Board”) functions as the Alameda County CoC Board, required by the Interim Rule to act on behalf of the membership to ensure the CoC responsibilities are fulfilled.

The CoC relies upon data collected in the HMIS to understand the extent and nature of homelessness, and how well the system is working to address it, and to report system and project performance to HUD. If implemented well, the HMIS should also support the operation of the housing and service system, including the CoC’s coordinated entry. Under HUD mandates, the CoC must designate a single information system as the official HMIS software for the geographic area, and an HMIS Lead, an entity designated to operate the HMIS (24 CFR Part 580.7). While the CoC must review, revise and approve all policies and plans the HMIS Lead is required to develop, the HMIS Lead must develop written policies and procedures for all Covered Homeless Organizations (CHOs), serve as the applicant to HUD for any HMIS grants, and monitor compliance by all CHO’s of the CoC (24 CFR Part 580.9).

Because managing the HMIS is a shared responsibility between the CoC and the HMIS Lead, expectations around each entity’s role must be agreed to and clearly documented, along with any role envisioned for the CoC Board and CoC Lead agency in its relationship to the HMIS.

This MOU describes in detail the roles, responsibilities, and accountability that guide the collaboration for the Alameda County Homeless Management Information System (HMIS) among
the Parties described below, consistent with the Alameda County Continuum of Care/EveryOne Home Governance Charter approved in October of 2017 and 24 CFR Parts 578 and 580.

II. Parties to this Memorandum of Understanding:

1. **The Continuum of Care Board (“CoC Board”): HUD Continuum of Care Committee**

   The Alameda County CoC has designated the HUD Continuum of Care Committee (HUD CoC) to function as the CoC Board. The CoC Board is required by the Interim Rule, and acts on behalf of the membership to ensure the CoC responsibilities are fulfilled. The CoC is responsible for ensuring that the HMIS for the Continuum of Care is operated in accordance with the provisions of the new regulations and other applicable laws. (24 CFR Part 580.5).

   The CoC Committee, acting as the CoC Board, may designate an organization to act on its behalf and/or provide staff support. That entity, identified as the CoC Lead, may undertake the activities of the CoC specified in this MOU.

2. **The Homeless Management Information System Lead (“HMIS Lead”): Alameda County Department of Housing and Community Development (HCD)**

   The Alameda County CoC has designated the Alameda County Department of Housing and Community Development Department as the HMIS Lead to operate the HMIS as required under 24 CFR Part 580.7, for assuring the CoC is compliant with all applicable HUD rules and regulations. HCD administers the HMIS funds provided by the CoC funding as well as the local match.

III. Roles and Responsibilities of Parties

A. **Roles and responsibilities of the HUD Continuum of Care Committee (CoC Board) with respect to HMIS:**

   1. Act on behalf of the membership to ensure HMIS is administered in compliance with HUD CoC regulations.

   2. Designate a single Homeless Management Information System (HMIS) for the geographical area (24 CFR Part 578.7(b)(1) and 24 CFR Part 580.5

   3. “Designate an eligible applicant to manage the Continuum’s HMIS, which will be known as the HMIS Lead.” (24 CFR Part 578.7(b)(2).

   4. “Review, revise and approve the policies and plans required by this part and by any notices issued from time to time (24 CFR Part 580.7),” including but not limited to a privacy plan, security plan, and data quality plan for the HMIS (24 CFR Part 578.7(b)(3).

   5. “Ensure consistent participation of recipients and subrecipients in the HMIS.” (24 CFR Part 578.7(b)(4).

   6. Analyze and approve the annual review of the HMIS system’s performance and functionality, using HMIS work-plan to measure progress.

B. **Roles and Responsibilities of Alameda County Housing and Community Development as HMIS Lead Agency (HMIS Lead):**

   1. As per 24 CFR 580.9(a), the HMIS lead must ensure the operation of and consistent participation by recipients of funds from the Emergency Solutions Grants Program and from the other programs authorized by Title IV of the McKinney-Vento Act. Duties include
establishing the HMIS; conducting oversight of the HMIS; and taking corrective action, if
needed, to ensure that the HMIS is compliant with the requirements of this part.

2. Develop written HMIS policies and procedures in accordance with § 580.31 for all Covered
Homeless Organizations (CHOs) (24 CFR Part 580.9).

3. Execute a written HMIS Participation Agreement with each CHO, which includes the obligations
and authority of the HMIS Lead and CHO (24 CFR Part 580.9), the requirements of the security
plan with which the CHO must abide (24 CFR Parts 580.31), the requirements of the privacy
policy with which the CHO must abide, the sanctions for violating the HMIS Participation
Agreement (e.g., imposing a financial penalty, requiring completion of standardized or
specialized training, suspending or revoking user licenses, suspending or revoking system
privileges, or pursuing criminal prosecution), and an agreement that the HMIS Lead and the
CHO will process Protected Identifying Information consistent with the agreement. The HMIS
Participation Agreement may address other activities to meet local needs. (24 CFR Part 580.9).

4. Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Continuum
of Care’s geographic area (24 CFR Part 580.9), as directed by the Continuum, and, if selected
for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved
activities.

5. Monitor and enforce compliance by all CHO’s with the requirements of this part and report on
compliance to the Continuum of Care and HUD.

6. The HMIS Lead must submit a security plan (see § 580.35), a data quality plan (see § 580.37),
and a privacy policy (see § 580.31(g)) to the Continuum of Care for approval within [the date
that is 6 months after the effective date of the final rule to be inserted at final rule stage] and
within 6 months after the date that any change is made to the local HMIS. The HMIS Lead must
review and update the plans and policy at least annually. During this process, the HMIS Lead
must seek and incorporate feedback from the Continuum of Care and CHO. The HMIS Lead
must implement the plans and policy within 6 months of the date of approval by the
Continuum of Care.

7. Provide staffing for HMIS.

8. Provide standard and customized reports, and technical support, as applicable and requested
by participating agencies in accordance with the mutually adopted customization policy.

9. Develop and implement HMIS-related training for end users, including regular Privacy and
Security training and software training. Develop written procedures and job aides for users.

10. Review data quality monthly and take necessary actions per mutually adopted data quality
assurance policy to maintain input of high-quality data from all HMIS-utilizing agencies. Report
to the COC Committee on data quality and quality assurance activities on a quarterly basis.

11. Solicit HMIS user feedback through using a variety of mechanisms, such as on-line forums,
surveys and user groups, such as the HMIS User Group. The User Group will work with the
HMIS Lead to: 1) Provide recommendations on use of software and software enhancements; 2)
Trouble-shoot frequent data quality errors; 3) Recommend modifications to HMIS staff created
reports; and 4) Improve coordinated entry workflow.

12. To the extent possible, ensure that CoC projects using an alternate data collection system
(such as Domestic Violence providers) are compliant with maintaining a “comparable
database” and collecting the necessary HMIS data elements.
13. Generate reports on HMIS data and additional data available to present results to HUD CoC Committee for gap analysis. Configure and maintain the HMIS to be an effective performance management system that is capable of measuring progress in meeting the system and project performance measures established through the EveryOne Home's Results Based Accountability (RBA) Committee.

14. Develop an effective communication plan to reach all HMIS participants to communicate changes to policy and procedures.

15. Develop an annual work plan for the HMIS System for review and final approval by HUD CoC. The annual work plan will be presented along with the HMIS budget proposal to the Board of Supervisors, including costs and funding sources.

C. Joint Responsibilities of the HUD CoC Committee (CoC Board) and Alameda County Housing and Community Development (HMIS Lead)

1. Participate in the HUD Continuum of Care Committee, and its HMIS-related sub-committees, including the HMIS Oversight Subcommittee.

2. Support the implementation of, and compliance with local HMIS policies such as, data quality and security, participation, and customization.

3. Collaborate to design and modify the configuration of HMIS projects, such that it meets program reporting and system analysis needs.

4. Participate in the EveryOne Home Results Based Accountability (RBA) Committee in using the HMIS to develop system performance measures, data dashboards, and other analytical tools that follow HUD HMIS standards and meet community needs.

5. Analyze system and programmatic data for trends, costs, performance, compliance, and progress on the Alameda CoC Plan to End Homelessness.

6. Work collaboratively with other committees in analyzing annual reports from HMIS, including the Longitudinal Analysis report (formerly AHAR), System Performance Measures, PIT Count, and HIC chart.

7. Establish the HMIS Oversight Subcommittee, that will act as a liaison between the HUD CoC Committee and the HMIS Lead Agency, with the following responsibilities:
   a. Review data quality reports and recommend a quality improvement program to the HUD CoC.
   b. Ensure compliance with federal requirements.
   c. Support and protect the rights and privacy of service users.
   d. Recommend to the HUD CoC a policy and set of procedures that will guide decisions about customization including establishing: A) a process through which a Contributing HMIS Organization (CHO) may request that project configuration, custom data collection fields, and/or assessments be built into the HMIS; B) the criteria upon which those requests are evaluated; and C) guidance for CHOs to appropriately manage requests for custom data collection fields and assessments.
   e. Collaborate with the HMIS lead on all HMIS policies the HMIS Lead is required to develop, including Privacy, Security, and Data Quality Plans as required by federal
regulation.

8. Review data quality reports and take appropriate action to ensure accountability and improved performance of CHO’s and system per approved policies.

9. Conduct an annual review of the HMIS system’s performance and functionality, using HMIS work-plan to measure progress. Criteria will be discussed with HMIS Lead.

10. Revisit license users’ policies and collaborate when additional funding is needed to expand programs and users.

IV. DURATION AND RENEWAL

1. Except as provided in the TERMINATION section, the duration of the MOU shall be for an initial five-year term from June 6, 2018, through June 6, 2023.

2. This agreement may be renewed by written agreement of both parties.

V. AMENDMENTS/NOTICES

The MOU may be amended in writing by the parties and is in effect upon signature of all parties. Notices shall be mailed, emailed or delivered to:

1. Chair of the HUD CoC Committee
2. Director of Alameda County Department of Housing and Community Development

VI. TERMINATION

Any party may terminate this MOU at a date prior to the renewal date specified in the MOU by giving 120 days written notice to the other party. The termination shall be effective on the date specified in the notice of termination.

In addition, if any of the Parties to this Memorandum of Understanding shall fail to fulfill in a timely and proper manner its obligations under this agreement, or if the Parties shall violate any of the covenants, agreements, or stipulations of this agreement, any of the Parties shall thereupon have the right to terminate this agreement by giving written notice of such termination and specifying the effective date thereof, which shall be at least 120 days before the effective date of such termination.

Signatures:

Chair, HUD CoC Committee, on behalf of the Alameda County Continuum of Care (CoC Board

Date: 6/1/18

Director, Alameda County of Housing and Community Development (HMIS Lead)

Date: 6/14/18

MOU Page 4
Summary of HMIS Functions and Responsibilities
Requirements and Best Practices
ICF, February 2019

Elements of High-Performing HMIS Leads
HMIS is a central component of ensuring coordination across multiple providers, funding sources, and programs and services, and for providing the data that informs resource allocation, performance measurement, and for supporting efforts to prevent and end homelessness in communities. As a result, HMIS Leads are expected to support the CoC collect high-quality data, evaluate program outcomes, and ensure that scarce resources are being used as effectively as possible by the homeless individuals and families who need assistance the most.

The leadership roles and operational functions that high-functioning HMIS Leads are responsible for include:

- Providing data analysis, reports, and program/project evaluation to the CoC, and ensuring that the CoC membership understands what data is available, how the data can be used, and how HMIS can be leveraged with other data sources to secure additional funding for programs and services
- Ensuring that client-level, project-level, and systems-level data meets quality standards regarding accuracy, completeness, reliability, and timeliness
- Providing training and technical assistance to HMIS end users to ensure the system is used as intended
- Developing agreements, plans, policies and procedures to ensure the effective operation of the system by end users
- Managing contracts with the HMIS vendor, and ensuring compliance with the terms of the contract
- Monitoring end users for compliance with data quality, privacy, security, and other components as defined in participation agreements, plans, policies and procedures
- Providing recommendations to the CoC to ensure adequate resourcing of HMIS, and for developing the necessary HMIS functionality to support local programmatic efforts to prevent and end homelessness
- Seeking advice from the CoC, HMIS advisory boards, and other community stakeholders regarding the use of HMIS, the strategic direction of HMIS, and necessary changes to policies and/or functionality to ensure that HMIS is used as effectively as possible
- Staffing of and participation in relevant boards, committees, sub-committees, and other groups that provide guidance, direction, and input on the strategic use of HMIS
- Ensuring that HMIS can support community-wide efforts to coordinate care, share data, and delivery homeless services through Coordinated Entry systems and process, 100 Day Challenges, data warehousing and analysis efforts, and other locally-defined approaches to delivering homeless services
- Regularly assessing the over use of, and access to, HMIS to ensure that the system is meeting the needs of contracted providers, community-based stakeholders, and households experiencing homelessness

In Houston, the Coalition for the Homeless of Houston/Harris County serves as the HMIS Lead for the CoC. The Coalition is supported by the HMIS Support Committee of the CoC, which is composed of nine members (only one of which is a representative of the HMIS Lead) and is charged with recommending policies, assisting in the development of procedures and documents, and supporting coordination between the HMIS Lead, the CoC, and participating organizations. In its advisory role, the HMIS Support Committee is also responsible for providing
advice and guidance to the HMIS Lead regarding overall operational and strategic use of HMIS to support local efforts to prevent and end homelessness.

In Detroit, the Homeless Action Network of Detroit (HAND) participates in a statewide HMIS implementation. The Michigan Coalition Against Homelessness (MCAH) serves as the statewide HMIS Lead, while HAND serves the Detroit CoC as the local system administrator, or “local HMIS Lead.” Staff from HAND chair the Data Committee and the Performance & Evaluation Committee of the Detroit CoC. The staffing of CoC data and performance committees by local HMIS Lead personnel creates a clear line of communication between the HMIS Lead and CoC stakeholders to understand and use HMIS data for planning and evaluation purposes.

In Los Angeles, the Los Angeles Homeless Services Authority develops forms, reports, HMIS functionality, and supplemental training and technical assistance opportunities to expand to the use of HMIS to support coordinated entry processes, implement swipe card technology for recording client entries and exits from programs and services, and expanding HMIS reporting capacity to meet the needs of funders, local stakeholders, and homeless households.

Requirements of an HMIS Lead
An HMIS Lead is the entity designated by the Continuum of Care to operate the CoC’s HMIS implementation on behalf of the CoC. The CoC is responsible for reviewing, revising, and approving a privacy plan, security plan, and data quality plan for the HMIS, as well as ensuring consistent participation in HMIS by recipients and subrecipients. The CoC is also responsible for ensuring that the HMIS is administered in compliance with HUD requirements, including meeting all project set up and reporting requirements for federal partner program participation in HMIS.

While the CoC is ultimately responsible for operating a compliant HMIS and for approving the privacy, security, and data quality plans that establish the basis for a CoC’s HMIS governance framework, it is the HMIS Lead that develops the plans, policies and procedures, and other agreements and standards that ensure that the HMIS is administered and operated in a way that both ensures compliance and meets the needs of community stakeholders to improve the delivery of homeless services. The HMIS Lead is the only organization given the authority by the Continuum of Care to make system-wide decisions regarding HMIS that impact all participating agencies within the CoC, and because system administration and related activities are done on behalf of the CoC and all community stakeholders.

The CoC Program interim rule specifies that the HMIS Lead is the only entity that can use CoC Program funds for the following activities:

- Hosting and maintaining HMIS software or data
- Backing up, recovering, or repairing HMIS software or data
- Upgrading, customizing, and enhancing the HMIS
- Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems
- Administering the system
- Reporting to providers, the Continuum of Care, and HUD
- Conducting training on using the system, including traveling to the training


These essential elements of HMIS administration ensure that the CoC’s HMIS is administered and operated in a standardized and transparent manner, and that the CoC, HMIS Lead, and contributing recipients and subrecipients have clearly defined roles and responsibilities regarding system use and data management.

The HMIS Lead must execute a written HMIS participation agreement with each organization using HMIS. The participation agreement specifies the functions, roles and responsibilities of the participating organization and those of the HMIS Lead. The agreement also delineates the penalties for non-compliance with any of the plans, policies and procedures, standards, or agreements that are required of a participating organization. Such penalties may include remedial training, revocation of licenses or system access, financial penalties and/or fees, or other penalties for non-compliance as determined.

The HMIS Lead must monitor participating organizations and enforce compliance with HMIS requirements. The areas of monitoring and enforcement include, but are not limited to, privacy, security, data quality, data use and access, training completion, and cost eligibility. HMIS Leads must report on compliance to the CoC and to HUD.

HUD requires the HMIS Lead to review and updates all plans and policies at least annually. During this annual review, the HMIS Lead must solicit and incorporate feedback on current plans and policies, as well as proposed changes, from both the Continuum of Care and recipients and subrecipients that participate in HMIS. HUD expects HMIS Leads to implement any changes approved by the CoC within six months of the date of approval.