

Homeless Management Information System (HMIS) Lead Agency



Delaware Continuum of Care

Memorandum of Understanding Between the Delaware Continuum of Care and Housing Alliance Delaware

I. INTRODUCTION

The purpose of this Memorandum of Understanding (MOU) is to confirm agreements between the Delaware Continuum of Care (CoC) and HOUSING ALLIANCE DELAWARE related to management of the CoC's Homeless Management Information System Database (HMIS). This MOU establishes HOUSING ALLIANCE DELAWARE, or any duly authorized successor entity, as the CoC's HMIS Lead Agency, and defines the roles and specific responsibilities of each party related to key aspects of the governance and operation of the HMIS.

II. DURATION

Except as provided in Section VII (Amendment) or VIII (Termination), or IX (Failure to Adhere to the MOU), the duration of this MOU shall be from **11/1/2021 — 10/31/2026**.

III. DEFINITIONS

A. CoC

The Delaware CoC, consisting of voting and non-voting members (i.e., the CoC membership), as well as a Board and Committees, is a community-based collaborative that ensures a responsive, fair, and just approach to addressing homelessness, and strives to achieve housing for all. The CoC voting members elect membership of the CoC Board. The Board makes decisions and acts on behalf of the CoC. It is the responsibility of the CoC Board and CoC Funding Committee (in collaboration with the CoC Lead Agency) to ensure that the HMIS Lead Agency is operating the HMIS in compliance with current HUD HMIS Regulations and other applicable laws.

B. HMIS

HMIS is the information system designated by the CoC to comply with the requirements of the CoC regulation 24 CFR 578. The HMIS is used to record, analyze, and transmit client and activity data in regard to the provision of shelter, housing, and services to individuals and families who are experiencing homeless or at risk of experiencing homelessness. HMIS is mandated by the U.S. Department of Housing and Urban Development (HUD) for all communities and agencies receiving HUD CoC and Emergency Solutions Grant program (ESG) funding. Locally, HMIS is known as the

Community Management Information System (CMIS); as such, “HMIS” and “CMIS” are functionally interchangeable.

C. HMIS Lead Agency Designation

The HMIS Lead Agency manages HMIS database operations on behalf of the CoC and provides HMIS administrative functions at the direction of the CoC.

D. Agency Partner (AP)

An AP contributes Protected Identifying Information (PII) or other client-level data to an HMIS.

E. AP Administrator

An AP Administrator is defined as a single point-of-contact established by each AP who is responsible for day-to-day operation of the AP data entry, ensuring program-level data quality according to the terms of the Partner Agency Agreement.

F. User

A User is defined as an employee, volunteer, affiliate, associate, and any other individual who uses or enters data in the HMIS or another administrative database from which data is periodically provided to the HMIS.

G. Software and Hosting

The CoC selects an HMIS vendor to provide the sole HMIS database for the CoC. The system is established as a direct data entry system; all APs are expected to regularly update data through mechanisms specified in Partner Agency Agreements. The authority to enter into contracts with the HMIS vendor for the purposes of operating and overseeing HMIS is the responsibility of the HMIS Lead Agency.

IV. SPECIFIC RESPONSIBILITIES OF THE PARTIES

A. CoC Responsibilities

These responsibilities are as follows:

1. Establish a single HMIS throughout the CoC’s geographic area
2. Monitor the HMIS Lead for compliance with relevant HUD regulations and standards, and ensure such responsibilities are being met
3. Designate the HMIS Lead Agency and the software to be used for HMIS, and approve any changes to the HMIS Lead Agency or software
4. Review and approval of all HMIS operational agreements, policies, and procedures
5. Promote the effective use of HMIS data, including measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs
6. Use HMIS data to inform CoC program and system design, and measure progress toward implementation of the CoC’s strategic goals
7. Coordinate, in collaboration with the HMIS Lead, participation in the HMIS (and broader

Continuum of Care) by all homeless assistance programs and other mainstream programs serving people experiencing homelessness

8. In official meeting minutes, the CoC Lead will record all approvals, resolutions, and other key decisions of the CoC that may be required by HUD rules related to the HMIS governing body.

B. HMIS Lead Agency Responsibilities

HOUSING ALLIANCE DELAWARE serves as the Lead Agency for HMIS, managing and administering all HMIS operations and activities. These responsibilities are contingent on continued receipt of the appropriate HUD grant funding, and are as follows:

1. Technical Expertise

- a. Maintain knowledge of HMIS data and technical requirements
- b. Attend HMIS training opportunities
- c. Attend software training opportunities
- d. Get connected to HMIS related distributions/listservs/ social media
- e. Participate in HMIS regional collaboration
- f. Provide data needed to inform the CoC of its progress toward achieving its strategic goals

2. System Administration

- a. Oversee the day-to-day administration of the HMIS system
- b. Provide staffing for operation of the HMIS
- c. Work with HMIS staff to implement an HMIS operations plan to ensure all responsibilities are fulfilled in a timely manner
- d. Develop policies and procedures to establish and manage fees
- e. Maintain a calendar of events, such as report due dates, training dates, monitoring dates, data committee meeting dates, annual recertification due dates, to support ongoing and cyclical HMIS operational activities
- f. Ensure the HMIS network infrastructure is up and running
- g. Ensure hosting, storage, and back-up procedures are completed in accordance with CoC expectations (if a vendor function, the system administrator should verify)
- h. Develop and execute HMIS AP and User Agreements, including:
 - i. Obligations and authority of the HMIS Lead and the AP
 - ii. Protocols for participation in HMIS
 - iii. Requirements of the policies and procedures by which the AP must abide
 - iv. Sanctions for violating the HMIS Agency Partner Agreement
 - v. Security and confidentiality requirements
 - vi. Terms of sharing and processing Protected Identifying Information between the HMIS Lead and the AP
- i. Add, remove, or update user account information, reset passwords, set and monitor end user access levels
- j. Update contact list of AP administrators and APs in conjunction with annual Partner Agency Agreement updates
- k. Ensure correct set up of projects in HMIS

- l. Customize/configure workflows within the capacity of the software, as authorized by the CoC, and in accordance with the CoC Privacy Plan, Privacy Notice, and data use and disclosure agreements.
- m. Assess and conduct HMIS software performance for improvement
- n. Manage contracts for the HMIS vendor, which includes training for APs and HMIS Lead Agency staff, and licensing of HMIS server
- o. Work with HMIS staff and software vendor to develop and implement custom project work plans
- p. Manage HMIS software updates
- q. Test, monitor, and validate software fixes
- r. Ensure technical requirements are incorporated into planning for special software projects
- s. Ensure the existence of current software technical documentation, such as system configuration and a local HMIS specific data dictionary
- t. Remove or archive client data from HMIS as authorized by the CoC
- u. Work with software vendor/ensure presence of a disaster protection and recovery plan for data hosting sites, including back-up sites and accessibility protocols
- v. Develop and manage a disaster recovery protocol for System Admin/HMIS Lead paper and electronic HMIS documents and agreements
- w. Support non-HMIS programs with a comparable database
- x. Install and configure new hardware and software, as applicable
- y. Determine length of time that HMIS records must be maintained for inspection and monitoring purposes per HUD standards and ensure compliance with these standards

3. Technical Support

- a. Develop and establish HMIS support structure, helpdesk, HMIS Policies and Procedures
- b. Conduct HMIS support and help desk activities within the scope of established HMIS policies, procedures, and protocols
- c. Respond to technical queries and assist end users
- d. Troubleshoot and resolve HMIS issues/bug/default tracking with HMIS software vendor
- e. Monitor data collection and review report compliance with HUD standards and federal partner requirements, when applicable
- f. Manage communication with the HMIS software vendor; report ongoing issues in accordance with HMIS Policies and Procedures
- g. Work with HMIS software vendor to plan and implement software upgrades and fixes
- h. Oversee and relate small- and large-scale changes to the HMIS database through coordination with the HMIS vendor and AP HMIS agency administrators, if applicable
- i. Design and implement a customer feedback forum (HMIS User group) to convene at least annually to discuss implementation of policies and procedures and data entry procedures
- j. Manage HMIS public website and community dashboard reporting
- k. Develop and, upon adoption by the CoC, implement written policies and procedures for the operation of the HMIS, including requirements and standards

for any APs and Users, and provide for the regular update of these procedures, as required by changes to policy

- l. Work with the CoC to facilitate HMIS participation of all homeless assistance programs and other mainstream programs serving people experiencing homelessness
- m. Ensure the consistent contribution of data that meets all HUD-established technical data standards to the HMIS database by, at minimum, every program operating with funds authorized by the McKinney-Vento Act as amended by the HEARTH Act, including ESG funds
- n. Manage and maintain mechanisms for soliciting, collecting and analyzing feedback from Users, AP HMIS agency administrators, CoC project managers, AP executive directors, and persons experiencing homelessness
- o. Establish policies, procedures, and conduct security standard monitoring, including HMIS related hard copy documents, such as completed intake forms, printed By Name Lists, printed documents with Personal Identifying Information (PII), and filing systems used to house these documents
- p. Create and implement a system security plan
- q. Implement technical safeguards to protect HMIS data, assuring devices used for HMIS are password protected, have up-to-date antivirus software, have locking screensavers, have individual or network firewalls, and physical device locations are secure
- r. Ensure that the HMIS software is configured correctly to ensure compliance with CoC established security policies and procedures
- s. Monitor audit logs for unauthorized access to client records and report deviations from security protocol according to an established channel of communication
- t. Ensure security of data during any electronic transfer of data
- u. Conduct security standard monitoring in accordance with established policies and procedures
- v. Document technical issues experienced by providers
- w. Ensure the consistent participation of recipients and subrecipients in the HMIS
- x. Monitor compliance by all APs with HMIS participation requirements, policies and procedures, privacy standards, security requirements, and data quality standards through an annual review, per the process outlined in the HMIS AP and User Agreements
- y. Establish protocols for addressing APs' compliance with data quality standards
- z. To the extent possible, ensure that projects using an alternate data collection system (such as Victim Service Providers) are compliant with maintaining a "comparable database" in compliance with relevant and current HMIS standards

4. HMIS Privacy

- a. Establish policies, procedures, and monitoring plan for the Privacy Notice; client authorization form (Release of Information); and electronic and paper documents

containing personal identifying information (i.e., intake forms, assessment tools, By Name Lists, referral forms, etc.).

- b. Ensure that the HMIS software is configured correctly to ensure compliance with CoC established privacy policies and procedures
- c. Conduct monitoring for compliance to established policies, procedures, and plans and report deviations from privacy protocol according to an established channel of communication
- d. Ensure HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data; and the maintenance of privacy, security, and confidentiality protections
- e. Develop and, upon adoption by the CoC, implement a privacy policy specifying data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; and process and protections for victims of domestic violence, dating violence, sexual assault, and stalking included in the HMIS database

5. Data Quality

- a. Develop and, upon adoption by the CoC, implement a data quality assurance plan and HMIS privacy and security policies and procedures, consistent with requirements established by HUD, and review and update this plan annually and upon update to HUD regulations, notice, or guidance
- b. Responsible for the implementation of the CoC's data quality plan
- c. Establish data quality standards and inform users of these standards
- d. Develop and maintain a data quality improvement/ maintenance plan
- e. Test, monitor, validate, and verify HMIS software can collect required data elements
- f. Monitor data quality in accordance with CoC established Data Quality Management Plan and/or provides support to users to increase data quality
- g. Work with end users to identify and resolve data quality issues
- h. Perform data integrity maintenance, such as record deduplication/merger, as authorized by the CoC
- i. Develop and operate a data quality monitoring plan to ensure HMIS collects required data as per the most recent HUD specifications, including federal partner requirements
- j. Establish, maintain, and monitor data and hardware disposal policies and procedures

6. Training

- a. Develop and implement a regular training plan for APs, that:
 - i. Ensures all required HMIS participants have received training and orientation on regulations pertaining to their funding
 - ii. Includes but is not limited to data entry requirements, capabilities and techniques; system security; privacy; HMIS policies and procedures; data quality; report generation, relevant to the audience (CoC Annual Performance Report, System Performance Measures, Emergency Solutions

Grant Consolidated Annual Performance and Evaluation Report); and HMIS vendor data entry/Database

- iii. Requires all AP System Administrators to participate in trainings (it is the responsibility of the AP System Administrator to ensure Users at the AP receive training)
 - iv. Trains **new** users on how to use HMIS before they receive password protected access to the system (scoring) or collect any HMIS data
 - v. Ensures every **current** AP completes a training update at least annually
 - vi. Meets AP needs
- b. Receive user input on training experience and training needs

7. Reporting

- a. Manage data imports and exports
- b. Create and maintain documentation of custom reports
- c. Extract, compile, and analyze HMIS data, in accordance with CoC policies and procedures
- d. Create and submit HUD-required reporting (i.e., PIT Count, HIC, LSA, etc.) on time and on behalf of the CoC
- e. Extract, compile, and analyze HMIS data, in accordance with CoC policies and procedures, to support service program staff in the creation and submission of federal project reports
- f. Contribute to and/or prepare and submit the HMIS APR

8. Grant Administration

- a. Prepare and submit HMIS Project Applications for HUD grants in e-snaps
- b. Create annual budgets outlining the most efficient resource allocation to meet HMIS requirements
- c. Support HMIS by funding eligible HMIS activities with eligible matching sources to serve as the HUD-required match
- d. Manage spending for all HMIS HUD grants
- e. Manage the reimbursement payment process and maintain records of all reimbursement documents, funds, approvals, denials, and other required or relevant records
- f. Ensure accurate and regular (quarterly, at minimum) draw down of grant funding
- g. Complete and submit APR for HUD grants in e-snaps

9. Other

- a. HMIS Lead Agency fully participates in/cooperates with the CoC Board in reviewing/updating the roles and responsibilities for CMIS in the Delaware CoC's governance charter document, when/as requested
- b. Attend Quarterly CoC, System Performance Committee, and CI Committee meetings

- c. Respond to CoC recommendations
- d. Sit on and participate in the System Performance Committee

V. DATA ACCESS AND MANAGEMENT

The HMIS Lead Agency’s authorized staff shall manage the data that is maintained in the HMIS database and will have access to all data entered by APs. HMIS Lead Agency staff will only use the data for purposes having to do with the CoC. The CoC will have access to aggregated and/or otherwise de-identified data that have met quality assurance standards as stipulated by the HMIS Lead Agency’s staff.

VI. COMMENCEMENT

This MOU will commence upon the signature of the affected parties.

VII. AMENDMENT/NOTICES

This MOU *may* be amended in writing by either party, so long as changes are mutually agreed upon by all parties.

VIII. TERMINATION

Either party, or duly authorized successor entity, may terminate this MOU at any time by giving sixty (60) days written notice to the other parties. If the funds relied upon to undertake activities described in this MOU are withdrawn or reduced, or if additional conditions are placed on such funding, any party may terminate this MOU within thirty (30) days by providing written notice to the other parties. The termination shall be effective on the date specified in the notice of termination.

Any dispute around termination shall not delay the CoC’s ability to submit HUD-required reporting. In the event that this MOU is terminated by either party, both are obligated to adhere to HUD’s guidance during the transition period.


IX. FAILURE TO ADHERE TO MOU

Failure to adhere to this MOU and/or concerns brought forth by the Board may result in the institution of a performance improvement plan and/or termination of HMIS Lead Agency designation.



Rachel Stucker
Executive Director, Housing Alliance Delaware

10/3/21
Date



Carrie Casey
Chair, Delaware Continuum of Care Board

10/19/2021
Date