

Santa Barbara County HMIS Administrative Policies & Procedures

Continuum of Care:

CA-603 Santa Maria/Santa Barbara County

HMIS Lead Agency:

County of Santa Barbara
Community Services Department
Housing and Community Development Division
105 E. Anapamu St., Room 105
Santa Barbara, CA 93101
Telephone: (805) 568-3520
Fax: (805) 560-1091

Contents

1. Introduction	3
2. Revision History	5
3. Project Overview.....	6
4. Governing Principles	7
5. Roles and Responsibilities.....	8
6. Operating Procedures	11
6.1 Project Participation	11
6.2 Training	13
6.3 System Administration.....	13
6.4 Compliance	14
6.5 Technical Support	14
6.6 Changes to This and Other Documents	15
7. Other Obligations and Agreements	16
8. Forms Control	17

1. Introduction

This document provides the framework for the ongoing operations of the Homeless Management Information System (HMIS) for the Santa Maria/Santa Barbara County Continuum of Care.

As described in the March 2010 HMIS Data Standards Revised Notice, an HMIS is an electronic data collection system that stores historical, person-level information about persons who access the homeless services system in a Continuum of Care. HMIS is a valuable resource because of its capacity to integrate and unduplicate data from all participating homeless assistance and homeless prevention programs in a Continuum of Care. Aggregate HMIS data can be used to understand the size, characteristics and needs of the homeless population at the local, state and national levels. The HMIS Data and Technical Standards are issued by the U.S. Department of Housing and Urban Development (HUD).

The following HUD HMIS Standards were referenced in the creation of this document:

- 2004 HMIS Data and Technical Standards Final Notice
- Guidance on HPRP Subgrantee Data Collection and Reporting for Victim Service Providers
- 2011 HMIS Requirements Proposed Rule
- 2017 HMIS Data Standards Revised Notice

The roles and responsibilities described in this document will primarily be fulfilled by the Continuum of Care, the HMIS Lead Agency, and HMIS Partner Agencies (referred to by HUD as Contributing Homeless Organizations or CHOs).

A Continuum of Care is a group composed of representatives of organizations, including nonprofit providers of homeless services, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, veterans service providers, mental health agencies, hospitals, universities, affordable housing developers and law enforcement, that serve homeless and formerly homeless persons and that carry out the responsibilities delegated to a Continuum of Care under HUD's regulations for a particular community. A Continuum of Care is ultimately responsible for oversight and guidance of HMIS. A Continuum of Care is also responsible for oversight of the security of the data and any public use of the data.

The Director of the Community Services Department, or his/her designee, is the authorizing agent for all agreements made between HMIS Partner Agencies and the HMIS Lead Agency. In all HMIS governance decisions, the Continuum of Care will balance the interests and needs of all HMIS stakeholders, including homeless men, women and children, service providers, and policy makers.

The HMIS Lead Agency provides day-to-day management of system participation, operations and security. In Santa Barbara County, the role of HMIS Lead Agency is currently filled by the Housing and Community Development Division of the Community Services Department of the County of Santa Barbara.

An HMIS Partner Agency is an entity that has agreed to uphold these Policies and Procedures by executing a Memorandum of Understanding with the County of Santa Barbara. Some HMIS Partner Agencies may be obligated to comply with the Health Insurance Portability and Accountability Act ("HIPAA"), and/or with 42 CFR Part 2, regarding the confidentiality of substance use disorder patient records. Where possible, these agencies should comply with HIPAA, with 42 CFR Part 2, and with the HMIS Data Privacy Plan. If it is not possible to reconcile all of the applicable rules, then agencies should comply with federal law. Agencies and programs are responsible for ensuring HIPAA and 42 CFR Part 2 compliance.

This document should, at a minimum, reflect the baseline requirements listed in the HMIS Data and Technical Standards Final Notice, published by HUD in July 2004 and revised in March 2010. All HMIS End Users are required to read and comply with the HMIS Data and Technical Standards. Failure to comply with the HUD standards carries the same consequences as failure to comply with these Policies and Procedures. In any instance where these Policies and Procedures and Security Plan are not consistent with the HUD HMIS Standards, the HUD Standards take precedence. Should any inconsistencies be identified, please immediately notify the HMIS Lead Agency.

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements (as specified in those requirements) and these Policies and Procedures. Agencies and programs are responsible for ensuring HIPAA compliance.

The Project Overview provides the main objectives, direction and benefits of HMIS. Governing Principles establish the values that are the basis for all policy statements and subsequent decisions. Operating Procedures provides specific policies and steps necessary to control the operational environment and enforce compliance in project participation, workstation security, user authorization and passwords, collection and entry of client data, release and disclosure of client data, training, compliance, and technical support. The Other Obligations and Agreements section discusses additional considerations of this project and the Forms Control section provides information on obtaining forms, filing and record keeping.

For convenience, the HMIS Data Quality, Privacy, and Security Plans are broken out as three separate documents. However, these documents (and associated policies) are an integral part of these Administrative Policies and Procedures, which collectively set forth the roles and responsibilities of the CoC, the HMIS Lead, and participating agencies.

2. Revision History

These Policies and Procedures, Data Quality Plan, Privacy Plan and Security Plan shall be reviewed and, if necessary, revised at least annually by the Continuum of Care. See Section 6.6 for Policies and Procedures related to changes of this and other documents.

Date	Author	Description
11/30/2013	N/A	Full revision referencing all HUD standards and 2011 HEARTH HMIS Proposed Rule
4/14/2014	County of Santa Barbara Community Services Department	Revisions referencing designations
10/20/2017	HomeBase	Split off Data Quality Plan, Privacy Plan and Security Plan into separate documents. Technical revisions based on best practices in other communities.

3. Project Overview

The long-term vision of HMIS is to enhance Partner Agencies' collaboration, service delivery and data collection capabilities by sharing information. Accurate information will put the Continuum of Care in a better position to request funding from various sources and help plan better for future needs. HMIS is designed to be an integrated network of homeless and other service providers that use a central database to collect, track and report uniform information on client needs and services. This system will not only meet Federal requirements but also enhance service planning and delivery.

A fundamental goal of HMIS is to document the demographics of homelessness in Santa Barbara County according to the HUD HMIS directive. It is the goal of the Continuum of Care to achieve an accurate count of the number of community residents experiencing homelessness, identify patterns in the utilization of assistance, and document the effectiveness of the services for the client. This will be accomplished through analysis of data that is gathered from people experiencing homelessness and the service providers who assist them in shelters and homeless assistance programs throughout the county. Data that is gathered via intake interviews and program participation will be used to complete HUD Annual Performance Reports, Annual Homeless Assessment Reports and point-in-time shelter counts. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, service providers, advocates and consumer representatives.

The local HMIS project utilizes a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the county. Access to HMIS is limited to agencies who have agreed to uphold these Policies and Procedures by executing a Memorandum of Understanding with the HMIS Lead Agency, and then only to authorized staff members who meet the necessary training and security requirements.

Homeless individuals and case managers can benefit from HMIS as a result of improved service coordination. HMIS facilitates information sharing among case management staff within one agency or between agencies (with written client consent) who are serving the same clients.

Agencies serving homeless individuals and program managers can benefit from HMIS by obtaining access to aggregate information that can be used to develop a more complete understanding of clients' needs and outcomes. Such information can then be used to advocate for additional resources, to conduct evaluations of program services, and to report to funding agencies such as HUD.

The Continuum of Care and policy makers can benefit from HMIS because county-wide use of a single shared data collection system provides the capacity to generate the HUD Annual Homeless Assessment Report and allows access to aggregate information that will assist in identification of gaps in services, as well as the completion of other service reports used to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

4. Governing Principles

It is the primary governing principle of the Santa Barbara County HMIS that HMIS is intended to serve and protect the community's clients. As such,

- Clients will be understood to be the owners of their own data. Each individual will have the right to grant informed consent, limit data sharing, or revoke consent related to his/her Protected Personal Information at any time.
- Security and confidentiality will be the top priorities of all End Users, who will serve as stewards of their clients' data.
- All End Users will strive for the highest possible degree of data quality. Data quality is a social justice issue because poor data quality can lead to reductions in funding and services, clients not being referred to the appropriate services to meet their needs, or improper findings of ineligibility.
- The community will use HMIS to improve service coordination and outcomes through data-driven decision making.
- The community will encourage broad HMIS participation by human services agencies.

HMIS End Users are expected to read, understand, and adhere to the spirit of these principles, even when the Policies and Procedures do not provide specific direction.

5. Roles and Responsibilities

The Continuum of Care is responsible for:

- HMIS management and administration in compliance with all applicable regulations,
- Designating a single information system as the official HMIS software for the region,
- Designating an HMIS Lead Agency,
- Executing an HMIS governance charter and maintaining documentation of compliance with that charter,
- Reviewing, revising and approving all HMIS plans, forms, standards and governance documents,
- Developing and implementing a strategic plan for HMIS participation, development and use in data-driven decision making,
- Authorizing the release of aggregate system-wide data on homelessness within the Continuum of Care at least annually,
- Confirming the resolution of security breaches,
- Using HMIS data to identify gaps in services to the homeless and promote solutions to local policy makers,
- Promoting and/or enforcing HMIS participation,
- Ensuring sufficient HMIS funding,
- Educating and raising consciousness of the community about homelessness.

The HMIS Lead Agency is responsible for:

- Liaising with HUD regarding federal HMIS standards and regulations,
- Developing HMIS plans, forms, standards and governance documents in compliance with all applicable regulations,
- Executing and maintaining copies of signed Memoranda of Understanding with Partner Agencies,
- Monitoring and providing regular reports to the Continuum of Care regarding HMIS data and Partner Agencies' compliance with local HMIS plans, forms, standards and governance documents,
- Liaising with HMIS software vendor(s),
- Procuring HMIS software and licenses,
- Overseeing software license administration, including adding and removing Partner Agency Technical Administrators ,
- Configuring HMIS software to meet Continuum of Care and/or Partner Agency needs,
- Maintaining HMIS web portal and resource library, including domain registration,
- Ensuring sound configuration of network and security layers,
- Ensuring the performance of system backup and disaster recovery processes,
- Developing and presenting training curriculum on the following topics: security, privacy, Technical Administrator responsibilities and workflow, end user responsibilities and workflow, data quality and reporting,
- Maintaining documentation of training attendance,
- Providing End User help desk support,
- Completing aggregate data reporting and extraction on behalf of the Continuum of Care, including Annual Performance Reports (APRs), Annual Homeless Assessment Report (AHAR), and Annual Sheltered Point-in-Time Counts
- Applying for HMIS funding from HUD.

The Partner Agency is responsible for:

- Signing and complying with the Memorandum of Understanding and all applicable plans, forms, standards and governance documents,

- Obtaining signed Release of Information (ROI) forms from clients, and maintaining archives or records showing which clients have signed the ROIs,
- Conducting a thorough annual review of internal compliance with all applicable HMIS plans, standards and governance documents,
- Detecting and responding to violations of any applicable HMIS plans, standards and governance documents,
- Completing thorough and accurate data collection as specified by HMIS forms and standards,
- Monitoring and maintaining security of all staff workstations used for HMIS data entry,
- Ensuring End User adherence to workstation security policies,
- Safeguarding client privacy through compliance with confidentiality and security policies,
- Securing and maintaining documentation of client informed consent,
- Designating a Partner Agency Technical Administrator to provide first-level End User support,
- Managing End User licenses,
- Ensuring all agency End Users complete the User Agreement and maintaining documentation of all User Agreements,
- Ensuring all agency End Users complete mandatory training and forwarding documentation of training provided by an authorized Partner Agency Technical Administrator to the HMIS Lead Agency,
- Providing and maintaining workstations with internet connectivity,
- Maintaining agency and program descriptor data in HMIS,
- Completing agency-level HUD reporting,
- Performing authorized imports of client data.

Each Partner Agency Technical Administrator is responsible for:

- Overseeing agency compliance with the Memorandum of Understanding and all applicable plans, forms, standards and governance documents.
- Ensuring all agency End Users complete the HMIS End User Agreement and maintaining necessary HMIS forms and documentation.
- Serving as the primary contact for all communication regarding the HMIS at this agency and forwarding information to all agency End Users as appropriate.
- Ensuring all agency End Users complete mandatory training and forwarding documentation of training to the HMIS Lead Agency.
- Providing first-level End User support, including front-line training, technical support, and resetting passwords that are forgotten by End Users within a Partner Agency.
- Ensuring thorough and accurate data collection by agency End Users as specified by HMIS forms and standards.
- Completing agency-level HUD reporting and/or supporting agency programs with reporting needs.
- Conducting appropriate audits of security, privacy, and data quality practices within the Partner Agency and assisting with corrective action as necessary.
- Safeguarding client privacy by ensuring End User and agency compliance with confidentiality and security policies.
- Continually monitoring and maintaining security of all staff workstations used for HMIS data entry.
- Preventing degradation of the HMIS resulting from viruses, intrusion, or other factors within the agency's control.
- Preventing inadvertent release of confidential client-specific information through physical, electronic or visual access to the workstation.
- Tracking the authorized users of HMIS within a Partner Agency.
- Tracking the computers and mobile devices that have been authorized by a Partner Agency to access HMIS.

- Ensuring the agency provides and maintains adequate internet connectivity.
- Detecting and responding to violations of any applicable HMIS plans, forms, standards and governance documents.

6. Operating Procedures

6.1 Project Participation

Confirming Participation

1. The Partner Agency shall confirm its participation in HMIS and commitment to these Policies and Procedures by submitting a Memorandum of Understanding signed by the Partner Agency's Executive Director to the HMIS Lead Agency. The authorizing agent of the HMIS Lead Agency will countersign the Memorandum of Understanding. The HMIS Lead Agency will return a copy of the countersigned Memorandum of Understanding to the Partner Agency's Technical Administrator and/or Executive Director.
2. At the time that the Partner Agency begins participating in HMIS, it must designate at least one Technical Administrator who must obtain an HMIS license. If the Technical Administrator is not the same person as the Executive Director, then the Technical Administrator must also sign the Memorandum of Understanding. In either case, the Technical Administrator must be listed in writing on the Memorandum of Understanding. If a new Technical Administrator later takes over this responsibility, the change must be recorded in writing and communicated to the HMIS Lead.
3. The HMIS Lead Agency will maintain a file of all signed Memorandums of Understanding.
4. Each Partner Agency shall re-confirm the agency's participation in HMIS and commitment to these Policies and Procedures at least annually by submitting a Memorandum of Understanding signed by the Partner Agency's Executive Director to the HMIS Lead Agency. The authorizing agent of the HMIS Lead Agency will countersign the Memorandum of Understanding. The HMIS Lead Agency will return a copy of the countersigned Memorandum of Understanding to the Partner Agency's Technical Administrator.
5. The HMIS Lead Agency will maintain and publicly publish a list of all current Partner Agencies on the HMIS web portal.

Voluntary Termination of Participation

1. The Partner Agency shall inform the HMIS Lead Agency in writing of their intention to terminate their participation in HMIS.
2. The HMIS Lead Agency will remove the departing agency from the list of Partner Agencies on the HMIS web portal.
3. The HMIS Lead Agency will revoke access of the Partner Agency staff to HMIS. Note: All Partner Agency information contained in the HMIS system will remain in the HMIS system.
4. The HMIS Lead Agency will keep all termination records on file with the associated Memorandums of Understanding.
5. The agency will be responsible for any cost of obtaining a hard copy or digital copy of HMIS information.

Termination of Participation for Lack of Compliance

1. When the HMIS Lead Agency determines that a Partner Agency is in violation of the Memorandum of Understanding by not fully complying with HMIS plans, forms, standards and/or governance documents, the HMIS Lead Agency will work directly with the Partner Agency's Executive Director to resolve the issue(s) in question.
2. If the HMIS Lead Agency and Partner Agency are unable to resolve issue(s), the HMIS Lead Agency may recommend terminating the Partner Agency's license(s):
 - i. The Partner Agency will be notified in writing by the HMIS Lead Agency of the intention to terminate the agency's participation in HMIS.

- ii. The Partner Agency will have 10 days from the date of notification to lodge an appeal with the CoC Board. If no appeal is received by the CoC Board within that time, the termination will become final.
- iii. If an appeal is received within the 10-day window, the CoC Board must consider the proposed termination at its next meeting. The Board may choose to schedule an emergency meeting for this purpose, or the Board may choose to keep its regular schedule. By majority vote, the Board may choose to veto the termination. If it does not do so, the termination becomes final.
- iv. If and when the termination becomes final, the HMIS Lead Agency will revoke access of the Partner Agency staff to HMIS. All Partner Agency information contained in the HMIS system will remain in the HMIS system. The HMIS Lead Agency will keep all termination records on file with the associated Memorandums of Understanding.
- v. Following the involuntary termination, the Partner Agency may appeal to the HMIS Lead and/or the CoC Board for reinstatement to HMIS provided the Partner Agency has corrected the issue(s) resulting in the initial termination ruling.
- vi. The Continuum of Care is empowered to permanently revoke a Partner Agency's access to HMIS for a serious and/or willful breach of security or confidentiality.

Workflow

1. The HMIS Lead Agency will maintain a resource library on the HMIS web portal that includes at minimum the community's Standardized Intake Form, HMIS Client Informed Consent and Release of Information Authorization (ROI), HMIS End User Manuals and Policies and Procedures. When any of these items is updated, the HMIS Lead Agency will attempt to notify all current End Users of the change.
2. End Users' data collection and data entry practices should follow the workflow and specific data entry guidelines established in the Standardized Intake Form, HMIS Client Informed Consent and Release of Information Authorization (ROI), HMIS End User Manuals, Policies and Procedures and/or training materials available on the HMIS web portal resource library. It is the End User's responsibility to ensure that s/he is always using the current versions of these forms and resources.
3. Victim service providers, defined as a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault or stalking, must use a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Legal service providers may also elect to use a comparable database if it is necessary to protect attorney-client privileges.
4. Client data will be entered into HMIS as soon possible following intake or service start date (not more than 3 business days later).
5. Once in HMIS, most client data will be shared among Partner Agencies in a manner consistent with the Release of Information form signed by the client. However, case notes and specific medical or psychological test results (e.g. HIV viral loads) will not be shared outside the agency that entered the data. In addition, information on domestic violence survivors will not be shared, because that information should not be entered into HMIS in the first place.
6. Any authorized data imports will be the responsibility of the Partner Agency.
7. The Partner Agency Technical Administrator is responsible for monitoring agency data quality on a weekly basis and forwarding error logs to agency End Users for correction. The HMIS Lead Agency will provide training to the Partner Agency Technical Administrator on how to access data quality reports and how to support End Users in correcting errors.
8. The Continuum of Care will adopt a plan to dispose of (or remove identifiers from) client data 7 years after it was created or last changed. Once adopted, that plan will be incorporated into these Policies and Procedures.

6.2 Training

Policies

- The HMIS Lead Agency is responsible for developing an HMIS training curriculum and materials and for providing ongoing trainings at sufficient intervals to promote high levels of data quality and consistent compliance with HMIS plans, forms, standards and governance documents.
- The Partner Agency Technical Administrator is responsible for ensuring that all agency End Users have completed mandatory trainings prior to being provided with a User ID to access HMIS.

Procedures

1. The HMIS Lead Agency will develop and maintain curriculum and training materials on the following topics:
 - i. HMIS Security and Privacy training
 - ii. Partner Agency Technical Administrator responsibilities and workflow training
 - iii. Partner Agency Technical Administrator 'train-the-trainer' training
 - iv. End User responsibilities and workflow training
 - v. Data quality and reporting training
 - vi. Module-specific training
2. The HMIS Lead Agency will be responsible for providing any trainings related to significant changes or updates in the HMIS software or system configuration. If the software changes are significant enough to warrant mandatory retraining of all users, the HMIS Lead Agency will attempt to notify all End Users of available training opportunities and to inform End Users of any applicable consequences of failure to attend mandatory training.
3. The HMIS Lead will maintain training records for 7 years.
4. All End Users must complete Security and Privacy training annually.
5. All End Users must complete a refresher version of End User responsibilities and workflow training annually.
6. All Partner Agency Technical Administrators must complete a refresher version of Partner Agency Technical Administrator responsibilities and workflow training annually in addition to completing End User responsibilities and workflow training annually.
7. A Partner Agency Technical Administrator who has attended 'train-the-trainer' training may be authorized by the HMIS Lead Agency to conduct some trainings for End Users. Attendance records and documentation of attendees' comprehension of the presented material (if applicable) must be forwarded by the Partner Agency Technical Administrator to the HMIS Lead Agency within 1 business day of a training hosted by a Partner Agency Technical Administrator.

Training

All new HMIS End Users must complete End User, Security and Privacy training prior to accessing HMIS and annually thereafter. Partner Agencies are encouraged to have additional non-HMIS employees and volunteers complete Security and Privacy training during orientation and annually thereafter to ensure that all individuals interacting with clients and using agency workstations are upholding these Security Standards. The HMIS Lead Agency will maintain training records for 7 years.

6.3 System Administration

Policies

- The HMIS Lead Agency, in partnership with the software vendor, will strive to maintain continuous system availability by design and by practice.

Procedures

1. The HMIS Lead Agency will inform End Users in advance of any planned interruptions in service.

6.4 Compliance

Policies

- Using reports available through the HMIS software, all changes to client data will be periodically and randomly audited for compliance.

Procedures

1. The HMIS Lead Agency will provide standard data quality, performance measurement, and compliance monitoring reports to the Continuum of Care at regular intervals to be established by the Continuum of Care. It is the responsibility of each Partner Agency to be aware of these reporting intervals and to ensure that the agency's data is current and accurate. Copies of reports submitted to the Continuum of Care will be made available to Partner Agencies by the HMIS Lead Agency.
2. The HMIS Lead Agency will complete all required annual reports to HUD on behalf of the Continuum of Care.
3. The HMIS Lead Agency will monitor all HUD communications regarding HMIS and update the Continuum of Care and Partner Agencies as appropriate about new standards, open comment periods, and/or recommendations.
4. As necessary, the HMIS Lead Agency will make recommendations to the appropriate Continuum of Care body regarding proposed changes to HMIS plans, forms, standards and governance documents as a result of changes to HUD standards or community practices.

6.5 Technical Support

Policies

- End Users submit support requests to their Partner Agency Technical Administrator, who may escalate the request to the HMIS Lead Agency, who may in turn escalate the request to the HMIS software vendor as appropriate. Support requests include reporting problems, requests for feature enhancements, or other general technical support. Under no circumstances should End Users submit support requests directly to the HMIS software vendor.
- The HMIS Lead Agency will only provide support for issues specific to HMIS software and systems.

Procedures

1. If an End User encounters a problem or originates an idea for improvement to the HMIS system configuration or software, that End User should send a request via email to the Partner Agency Technical Administrator specifying the severity of the problem, its impact on the End User's work, specific information necessary to reproduce the problem (browser information, client ID#, date/time stamping, etc.), and any other documentation that might facilitate the resolution of the problem. The requesting End User should also provide his/her contact information and best times to contact.
2. The Partner Agency Technical Administrator, upon receipt of a support request, shall make reasonable attempts to resolve the issue.
3. If the Partner Agency Technical Administrator is unable to resolve the issue and determines that the problem is specific to the HMIS software and/or system configuration, the Partner Agency Technical Administrator shall consolidate multiple similar requests and submit a support request to the HMIS Lead Agency via email.

4. If the support request is deemed by HMIS Lead Agency to be an agency-specific customization, resolution of the request may be prioritized accordingly. Upon the agreement of both parties, the HMIS Lead Agency reserves the right to charge a Partner Agency on an hourly basis for agency-specific customizations. Agency-specific customizations may include, but are not limited to, new assessments, new data fields, new options in drop-down menus and new reports.
5. If the HMIS Lead Agency determines that the cause of a reported issue is outside the scope of control of the HMIS Lead Agency's System Administrator, the HMIS Lead Agency may forward the request to the HMIS software vendor, or contract with other software or technical support providers as necessary to resolve the issue(s).
6. Requests from funders and/or jurisdictions for aggregate agency- or program-level data should be directed to the appropriate Partner Agency Technical Administrator (or other agency contact person) with the information provided directly to the requesting jurisdiction by that Partner Agency.

6.6 Changes to This and Other Documents

Policies

- All plans, forms, standards and governance documents regulating the operation and administration of the Santa Barbara County HMIS shall be reviewed and, if necessary, revised at least annually by the Continuum of Care.
- The HMIS Lead Agency will be responsible for notifying the Continuum of Care if an update to one or more of the plans, forms, standards and governance documents is necessary.

Procedures

Changes to Policies & Procedures

1. Proposed changes to HMIS plans, forms, standards and governance documents may originate from any Continuum of Care member.
2. When proposed changes originate within an HMIS Partner Agency, they must be reviewed by the Partner Agency Executive Director, and then submitted by the Partner Agency Executive Director to the HMIS Lead Agency.
3. HMIS Lead Agency will maintain a list of proposed changes.
4. The list of proposed changes will be reviewed and discussed at least annually by the Continuum of Care, or a designated committee of the Continuum of Care. The date and time of this discussion will be communicated to all Continuum of Care members and HMIS End Users through established Continuum of Care communication channels.
5. Recommended changes to HMIS plans, forms, standards and governance documents resulting from the review and discussion of proposed changes by the Continuum of Care or Continuum of Care committee will be forwarded to the Continuum of Care Board for approval.
6. Within 10 working days after approval by the Continuum of Care Board, the HMIS Lead Agency will forward a copy of the adopted HMIS plans, forms, standards and/or governance documents to all HMIS Partner Agency Executive Directors. Partner Agency Executive Directors shall acknowledge receipt and acceptance of the adopted HMIS plans, forms, standards and/or governance documents in writing or by email to HMIS Lead Agency within a subsequent 10 working days. The Partner Agency Executive Director shall also circulate the revised document to all End Users within his/her agency and ensure agency compliance with the adopted HMIS plans, forms, standards and/or governance documents.

7. Other Obligations and Agreements

Policy

- Current funding for HMIS provides for a limited number of software End User licenses. While it may not be possible to meet every Partner Agency's requests for End User licenses within the existing funding, the HMIS Lead Agency, in partnership with the Continuum of Care, will endeavor to ensure that every Partner Agency will have its minimum requirements met.

Procedure

1. The HMIS Lead Agency has discretion to set the fees to be charged to some or all providers to participate in HMIS, so long as no provider is charged more than the cost of the licensing fees that are actually paid to the relevant HMIS vendor, e.g., to ServicePoint. For example, if ServicePoint is charging \$500/year to provide HMIS access to an agency, then the HMIS Lead could set any fee between \$0/year and \$500/year for that agency.
2. The HMIS Lead Agency may also establish any reasonable fee structure for Partner Agencies to participate in HMIS, with approval from the Continuum of Care. Partner agencies will be given an opportunity to provide feedback on any fee structure before it is adopted. If adopted, the fee structure will be incorporated into the Partner Agency Memorandum of Understanding. The fee structure implementation plan will provide Partner Agencies with sufficient time before the first fee payment is due to allow Partner Agencies to attempt to secure additional funding to cover the expense.

8. Forms Control

All forms required by these Policies and Procedures are available in on the HMIS web portal. Completed forms must be filed as described in the chart below and maintained for 7 years.

Filing of Completed Forms

Form ID #	Form title	Responsibility for maintaining file of signed forms
1MOU-20171020	Memorandum of Understanding	HMIS Lead Agency
1CC-20171020	Compliance Certification Checklist	HMIS Lead Agency
1EU-20171020	HMIS End User Agreement	Partner Agency Technical Administrator
1ROI-20171020	Client Informed Consent and Release of Information Authorization	Partner Agency End User
1SI-20171020	Standardized Intake	N/A

Form ID Syntax: Version Number + Form Code – YYYYMMDD of last revision