



Memphis and Shelby County Homeless Management Information System
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Homeless Management Information System Governance Charter

MSCCOC HMIS GOVERNANCE
CHARTER

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MSCCOC HMIS GOVERNANCE CHARTER

PURPOSE

The Community Alliance for the Homeless (CAFTH) operates the Homeless Management Information System (HMIS) to record and store client-level information with regard to numbers, characteristics and needs of persons who use shelter, housing and supportive services who are experiencing homelessness within the Memphis/Shelby County Continuum of Care.

HMIS is used to aggregate data about the extent and nature of homelessness over time; produce an unduplicated count of homeless persons; understand patterns of service use; and assist the MSCCOC to measure the effectiveness of homeless assistance projects and programs. Data produced is used for planning, education and submission to HUDCPD.

Memphis/Shelby County Continuum of Care (MSCCOC) Responsibilities

The MSCCOC is responsible for:

- Designating a single information system as the official HMIS software for Memphis/Shelby County.
- Designating an HMIS Lead to administer the HMIS.
- Providing for governance of the HMIS Lead, including:
 - The requirement that the HMIS Lead enter into written HMIS Memorandum of Agreements with each Partnering HMIS Agency (PHA) requiring the PHA to comply with federal regulations regarding HMIS and imposing sanctions for failure to comply; and
 - The participation fee, if any, charged by the HMIS.
- Maintaining documentation evidencing compliance with this part and with the governance charter.
- Reviewing, revising and approving the policies and plans required by federal regulation.

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Designations

- **HMIS System**
The CAFTH designates the Service Point software operated by Bowman Systems as the official HMIS for Memphis/Shelby County.
- **HMIS Lead**
The MSCCOC designates the CAFTH as the HMIS Lead to administer the MSCCOC HMIS.

Responsibilities of the HMIS Lead

The HMIS Lead is responsible for:

- Ensuring the operation of and consistent participation by recipients of MSCCoC and Emergency Solutions Grants (ESG) Program funds, along with Federal Partner programs including SAMHSHA, PATH, and VA SSVF Partnering HMIS Agencies, including oversight of the HMIS and any necessary corrective action to ensure that the HMIS is in compliance with federal requirements.
- Develop written HMIS policies and procedures in accordance with §24 CFR 580.31.
- Execute a written HMIS Memorandum of Agreement with each PHA, which includes the obligations and authority of the HMIS Lead and PHA, the requirements of the security plan and privacy policy with which the PHA must abide, sanctions for violating the HMIS Participation Agreement and an agreement that the HMIS Lead and the PHA will process protected identifying information consistent with the agreement.
- Serving as the applicant to the US Department of Housing and Urban Development (HUD) for CoC grant funds to be used for HMIS activities for the CAFTH, as directed by the MSCCoC, and entering into grant agreements with HUD to carry out the HUD-approved HMIS activities.
- Monitoring and enforcing compliance by all PHAs with HUD requirements and reporting on compliance to the MSCCoC and HUD.
- Monitoring data quality and taking necessary actions to maintain input of high quality data from all PHAs.

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- The CAFTH must submit a security plan, an updated data quality plan, and a privacy policy to the MSCCoC for approval within six (6) months after the effective date of the HUD final rule establishing the requirements of these plans, and within six (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 MSCCoC and PHA. The CAFTH must implement the plans and policy within six (6) months of the date of approval by the MSCCoC.

Duties of the HMIS Lead

- **MSCCoC HMIS Policies and Procedures**

The CAFTH must adopt written policies and procedures for the operation of the HMIS that apply to CAFTH as HMIS Lead, its PHAs, and the Continuum of Care. These policies and procedures must comply with all applicable Federal law and regulations, and applicable state or local governmental requirements. The CAFTH may not establish local standards for any PHA that contradicts, undermines or interferes with the implementation of the HMIS standards as prescribed in this part.

- **Unduplicated Count**

The CAFTH must, at least once annually, or upon request from HUD, submit to the MSCCoC an unduplicated count of clients served and an analysis of unduplicated counts, when requested by HUD.

- **Reporting**

The CAFTH must submit reports to HUD as required.

- **Privacy**

The CAFTH must develop a privacy policy. At a minimum, the privacy policy must include data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault and stalking; and such additional information and standards as may be established by HUD in notice. Every organization with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including enforcement of sanctions for noncompliance.

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- **HMIS Standards**

The CAFTH, in contracting an HMIS vendor, must require the HMIS vendor and the software to comply with HMIS standards issued by HUD as part of its contract.

Responsibilities of the CoC HMIS/Data Committee

The HMIS Committee will work with the CAFTH to:

- Develop, annually review, and, as necessary, revise for Board approval a privacy plan, security plan, and data quality plan for the HMIS, as well as any other HMIS policies and procedures required by HUD.
- Develop for Board approval and implement a plan for monitoring the HMIS to ensure that:
 - Recipients and sub-recipients consistently participate in HMIS;
 - HMIS is satisfying the requirements of all regulations and notices issued by HUD; and
 - The CAFTH is fulfilling the obligations outlined in its HMIS Governance Charter and Agreement with the MSCCoC, including the obligation to enter into written memorandum of agreements with each contributing HMIS agency.
- Oversee and monitor HMIS data collection and production of the following reports:
 - Sheltered point-in-time count;
 - Unsheltered point-in-time count;
 - Housing Inventory Chart(HIC);
 - Annual Homeless Assessment Reports (AHAR); and
 - Annual Performance Reports (APRs).

Responsibilities of the PHA

- A PHA must comply with federal regulations regarding HMIS. A PHA must comply with Federal, state, and local laws that require additional privacy or confidentiality protections. When a privacy or security standard conflicts with other Federal, state, and local laws to which the PHA must adhere, the PHA must contact the HMIS Lead and collaboratively update the applicable policies for the PHA to accurately reflect the additional protections.

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Joint CAFTH & PHA Responsibility for Privacy

- The CAFTH and the PHA using the HMIS are jointly responsible for ensuring that HMIS processing capabilities remain consistent with the privacy obligations of the PHA.