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Texas Balance of State  
Continuum of Care

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Homeless Management  
Information System (HMIS)  
Policies & Procedures

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## 1. Purpose

The Texas Balance of State Continuum of Care (CoC) operates a Homeless Management Information System (HMIS) to record and store client-level information about the numbers, characteristics, and needs of persons who use homeless housing and supportive services and for persons who receive assistance for persons at risk of homelessness.

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 measure the effectiveness of homeless assistance projects and programs. Data produced is used for planning and education.

## 2. Texas Balance of State CoC Responsibilities

The Texas Balance of State CoC is responsible for:

- ☐ Designating a single information system as the official HMIS software for the geographic area.
- ☐ Designating an HMIS Lead to operate the HMIS.
- ☐ Providing for governance of the HMIS Lead, including:
  - o The requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Contributing HMIS Organization (CHO) requiring the CHO to comply with federal regulations regarding HMIS and imposing sanctions for failure to comply; and
  - o The participation fee, if any, charged by the HMIS;
- ☐ Maintaining documentation evidencing compliance with this part and with the governance charter; and
- ☐ Reviewing, revising and approving the policies and plans required by federal regulation.

## 3. Designations

### 3.1. HMIS System

The CoC designates the Client Track System operated by Texas Homeless Network as the official HMIS for the Texas Balance of State CoC's geographic area.

### 3.2. HMIS Lead

The Texas Balance of State CoC designates Texas Homeless Network as the HMIS Lead to operate the Texas Balance of State CoC's HMIS.

#### **4. Responsibilities of the HMIS Lead**

The HMIS Lead is responsible for:

- ☐ Ensuring the operation of and consistent participation by recipients of CoC and Emergency Solutions Grants (ESG) Program funds, including oversight of the HMIS and any necessary corrective action to ensure that the HMIS is in compliance with federal requirements;
- ☐ Developing written HMIS policies and procedures in accordance with § 580.31 for all CHOs;
- ☐ Executing a written HMIS Participation Agreement with each CHO, which includes the obligations and authority of the HMIS Lead and CHO, the requirements of the security plan and privacy policy with which the CHO must abide, sanctions for violating the HMIS Participation Agreement, and an agreement that the HMIS Lead and the CHO 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 CoC's geographic area, as directed by the Texas Balance of State CoC, and entering into grant agreements with HUD to carry out the HUD-approved HMIS activities;
- ☐ Monitoring and enforcing compliance by all CHOs with HUD requirements, and reporting on compliance to the CoC and HUD;
- ☐ Monitoring data quality and taking necessary actions to maintain input of high-quality data from all CHOs;
- ☐ The HMIS Lead must submit a security plan, an updated data quality plan, and a privacy policy to the CoC for approval within 6 months after the effective date of the HUD final rule establishing the requirements of these plans, 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 CoC and CHOs. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Texas Balance of State CoC.

#### **5. Duties of the HMIS Lead**

##### **5.1. Texas Balance of State CoC HMIS Policies and Procedures**

The HMIS Lead must adopt written policies and procedures for the operation of the HMIS that apply to the HMIS Lead, its CHOs, and the Continuum of Care. These policies

and procedures must comply with all applicable Federal laws and regulations, and applicable state or local governmental requirements. The HMIS Lead may not establish local standards for any CHO that contradicts, undermines, or interferes with the implementation of the HMIS standards as prescribed in this part.

### **5.2. Unduplicated Count**

The HMIS Lead must, at least once annually, or upon request from HUD, submit to the Texas Balance of State CoC an unduplicated count of clients served and an analysis of unduplicated counts, when requested by HUD.

### **5.3. Reporting**

The HMIS Lead shall submit reports to HUD as required.

### **5.4. Privacy**

The HMIS Lead 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.

### **5.5. HMIS Standards**

The HMIS Lead, 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.

### **5.6. Participation Fee**

The HMIS Lead shall charge a nominal user license fee for CHOs. Each CHO that receives HUD funding will pay \$800/year for 5 user licenses. CHOs that do not receive HUD funding may purchase individual user licenses at \$200 each. Where the HMIS Lead determines it is appropriate, it will authorize and pay for additional users for any CHO.

## **6. Responsibilities of the CoC HMIS/Data Committee**

The HMIS Committee will work with the HMIS Lead to:

- ② 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.
- ② Develop for Board approval and implement a plan for monitoring the HMIS to ensure that:
  - o Recipients and subrecipients consistently participate in HMIS;
  - o HMIS is satisfying the requirements of all regulations and notices issued by HUD;
  - o The HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Charter and Agreement with the Texas Balance of State CoC, including the obligation to enter into written participation agreements with each CHO.
- ② Oversee and monitor HMIS data collection and production of the following reports:
  - o Sheltered point-in-time count;
  - o Housing Inventory Chart;
  - o Annual Homeless Assessment Report (AHAR); and
  - o Annual Performance Reports (APRs).

## **7. Responsibilities of the CHO**

A CHO must comply with federal regulations regarding HMIS. A CHO 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 CHO must adhere, the CHO must contact the HMIS Lead and collaboratively update the applicable policies for the CHO to accurately reflect the additional protections.

## **8. Joint HMIS Lead-CHO Responsibility for Privacy**

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