

Philadelphia Continuum of Care HMIS Governance Charter

Purpose

The purpose of this document is to serve as a governance charter for the oversight of the Homeless Management Information System ("HMIS"). This document is to serve as an agreement between the Philadelphia Continuum of Care ("CoC") and the City of Philadelphia Office of Homeless Services ("Homeless Services"), the designated HMIS Lead Agency. The provisions of this charter shall go into effect immediately.

Responsibilities of the Philadelphia Continuum of Care

As established in the CoC Program interim rule, the Continuum of Care must:

1. Designate a single HMIS for the Philadelphia CoC;
2. Designate a single eligible applicant to manage its HMIS, which is known as the HMIS Lead Agency;
3. Review, revise, and approve privacy, security, and data quality plans for the HMIS;
4. Ensure the consistent participation of CoC Program funded recipients, other federal partners' respective program funded recipients (*i.e.* ESG, SSVF, PATH, ...etc.) and their sub-recipients in the HMIS; and
5. Ensure HMIS is administered in compliance with requirements prescribed by HUD.

The Philadelphia CoC will carry out its responsibilities through the work of Homeless Services staff, the CoC Board, the Advisory Committee, and the HMIS Subcommittee.

Designations

The Philadelphia CoC designates the Office of Homeless Services as the HMIS Lead Agency to operate the Philadelphia CoC's HMIS.

Responsibilities of the HMIS Lead Agency

The HMIS Lead Agency will:

1. Ensure the operation of and consistent participation by recipients of funds from federal partners and their respective programs in the effort to end homelessness, which include 1) U.S. Department of Health and Human Services (HHS), 2) U.S. Department of Housing and Urban Development (HUD), and 3) U.S. Department of Veterans Affairs (VA). Duties include:
 - a. Establishing the HMIS, which includes the recommendation of the vendor and software;
 - b. Conducting oversight of the HMIS;
 - c. Taking corrective action, if needed, to ensure that HMIS is compliant with all federal, state, and local standards;
 - d. Making recommendations for changes to the HMIS in order to better support the data reporting needs and requirements of the Philadelphia CoC and the HMIS Participating Agencies.
 - e. Adopting written policies and procedures for the operation of the HMIS that apply to the HMIS Lead Agency, the HMIS Participating Agencies, and the Philadelphia CoC. At least once annually, or as required by HUD, submit to the Philadelphia CoC an unduplicated count of clients served and an analysis of the unduplicated counts;

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- f. Submitting HUD required reports (*i.e.* HIC, PIT, AHAR);
 - g. Developing a privacy policy that, at a minimum, includes: 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; and
 - h. Requiring the HMIS vendor and software to comply with HMIS standards issued by federal partners as part of its contract.
2. Execute a written HMIS Participation Agreement with each HMIS participating agency, which includes:
- a. Obligations and authority of HMIS Lead Agency and each HMIS participating agency;
 - b. Requirements of the Security Plan with which each HMIS participating agency must abide;
 - c. Requirements of the Data Quality Plan with which each HMIS participating agency must abide;
 - d. Requirements of the Privacy Policy with which each HMIS participating agency must abide;
 - e. 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);
 - f. Agreement that the HMIS Lead Agency and HMIS participating agencies will process Protected Identifying Information consistent with the agreement; and
 - g. Any additional activities to meet local needs.
3. Provide new user and refresher training:
- a. Each end user is required to complete the New User Training prior to gaining access to HMIS. The HMIS training staff will provide training to all end users. Request for all new user & refresher training requests must be made through PhilaHMIS@Phila.gov;
 - b. Upon completion of the required training and signing of the HMIS User Agreement, the HMIS staff will provide a unique username and initial password for each eligible individuals.
4. Provide HMIS technical support:
- a. The HMIS staff will provide a reasonable level of support to HMIS Participating Agencies via email, phone, and/or remote access;
 - b. Technical Support will be available Monday through Friday (excluding holidays) from 8:00 AM to 5:00 PM;
 - c. For all ClientTrack related technical support issue, the request must be submitted by clicking the Help link at <https://www.clienttrack.net/PhilaHMIS>. Other technical support requests may be sent to PhilaHMIS@Phila.gov;
 - d. The HMIS staff will try to respond to all email inquiries and issues within three (3) business

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days, depending on support load, holidays, and other events;

- e. The HMIS staff will submit a ticket to the software vendor if additional support is necessary.
5. Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Philadelphia CoC, as directed by the Philadelphia CoC, and enter into a grant agreement with HUD to carry out the HUD-approved activities;
6. Monitor and enforce compliance by all HMIS Participating Agencies with all federal, state, and local requirements, and report on compliance to the Philadelphia CoC Advisory Committee and federal partners;
7. Monitor data quality and take necessary actions to maintain input of high-quality data from all HMIS Participating Agencies;
8. Submit for review to the CoC HMIS Subcommittee a Security Plan, a Data Quality Plan, and a Privacy Policy to the Philadelphia CoC Board for approval within six (6) months of the effective date of the HMIS Final Rule and within six (6) months after the date that any change is made to the local HMIS. The HMIS Lead Agency must review and update the plans and policy at least annually. During this process, the HMIS Lead Agency must seek and incorporate feedback from the Philadelphia CoC and from the HMIS participating agencies. The HMIS Lead Agency must implement the plans and policy within six (6) months of the date of approval by the Philadelphia CoC Board.

Responsibilities of the CoC HMIS Subcommittee

The HMIS Subcommittee will work with the HMIS Lead Agency to:

1. Annually review, and, as necessary, make recommendations for Philadelphia CoC Board approval of the privacy, security, and data quality plans, as well as any other HMIS policies and procedures required by federal partners;
2. Develop for Philadelphia CoC Board approval, and implement, a plan for monitoring the HMIS to ensure that:
 - a. All HMIS Participating Agencies consistently participate in HMIS;
 - b. HMIS satisfies the requirements of all regulations and notices issued by federal partners;
 - c. The HMIS Lead Agency fulfills the obligations outlined in its HMIS Governance Charter with the Philadelphia CoC, including the obligation to enter into written participation agreements with each contributing HMIS organization.
3. Oversee and monitor HMIS data collection and production of the following reports:
 - a. Sheltered Point-In-Time count (PIT);
 - b. Housing Inventory Chart (HIC);
 - c. Annual Homeless Assessment Report (AHAR);
 - d. Annual Performance Reports (APRs);
 - e. Data Quality Monitoring Reports; and
 - f. System Performance Measures

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Responsibilities of the HMIS Participating Agencies

HMIS Participating Agencies will:

1. Comply with federal HMIS regulations as found in:
 - a. Federal Register, Vol. 69, No. 146, Part II, Department of Housing and Urban Development, Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice; Notice, July 30, 2004 (“HUD HMIS 2004 Final Notice”); and
 - b. U.S. Department of Housing and Urban Development, Office of Community Planning and Development, 2017 Homeless Management Information System (HMIS) Data Standards: Dictionary and Manual (“2017 HMIS Data Standards and Dictionary”); and
 - c. Any subsequent revisions of either notice; and
 - d. Any subsequent additional releases containing HMIS regulations and requirements.
2. Comply with the HMIS Participation Agreement;
3. Comply with all policies and procedures that are developed by the HMIS Lead Agency, including data quality, privacy, and security plans;
4. Participate in the Philadelphia CoC Data Quality Monitoring efforts by implementing internal processes to reduce the percentage of client records containing null, “client doesn’t know”, “client refused”, and “data not collected” values and to ensure valid contact, project entry and exit dates are entered into the HMIS within 72 hours of applicable activity.

Duration

The duration of this charter will last until terminated by either party. This charter must be reviewed annually and updated as needed.

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Update Log

Created: December 7, 2012

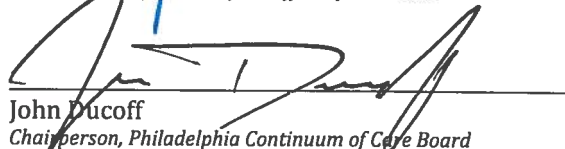
Reviewed and Reapproved: January 21, 2014
November 5, 2015
September 11, 2017




Elizabeth G. Hersh
Director, City of Philadelphia Office of Homeless Services



Date



John Ducoff
Chairperson, Philadelphia Continuum of Care Board



Date

