



Arizona  
Department  
of Housing

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# Homeless Management Information System Governance Charter

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1110 West Washington Street, Suite 310 | Phoenix, AZ 85007  
Telephone: (602) 771-1000 | Facsimile: (602) 771-1002 | TTY: (602) 771-1001



**HOMELESS MANAGEMENT  
INFORMATION SYSTEM  
GOVERNANCE CHARTER**

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# Arizona Balance of State Continuum of Care Charter

## 1. Purpose

The Arizona Balance of State Continuum of Care (BoS CoC) operates a 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 thirteen (13) counties that constitute the Arizona Balance of State 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 Arizona BoS CoC to measure the effectiveness of homeless assistance projects and programs. Data produced is used for planning, education and submission to HUDCPD.

## 2. Arizona Balance of State Continuum of Care (BoS CoC) Responsibilities

The BoS CoC is responsible for:

- Designating a single information system as the official HMIS software for the geographic area.
- 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 Participation Agreements with each Participating 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.

### **3. Designations**

#### **3.1. HMIS System**

The BoS CoC designates the Service Point software operated by Wellsky as the official HMIS for the Arizona Balance of State CoC's geographic area.

#### **3.2. HMIS Lead**

The Arizona BoS CoC designates the Arizona Department of Housing (ADOH) as the HMIS Lead to administer the Arizona BoS CoC HMIS. ADOH may sub-contract all or part of the administration of the BoS CoC HMIS.

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

The HMIS Lead is responsible for:

- Ensuring the operation of and consistent participation by recipients of BoS CoC and Emergency Solutions Grants (ESG) Program funds, along with Federal Partner programs including SAMHSA, PATH and VA SSVF Participating 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 Participation 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 BoS CoC's geographic area, as directed by the Arizona BoS CoC, 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 CoC and HUD.
- Monitoring data quality and taking necessary actions to maintain input of high-quality data from all PHAs.
- The HMIS Lead must submit a security plan, an updated data quality plan, and a privacy policy to the CoC 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 BoS CoC and PHA. The HMIS Lead must implement the plans and policy within six (6) months of the date of approval by the Arizona BoS CoC.

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

### **5.1. Arizona BoS CoC HMIS Policies and Procedures**

The Arizona BoS CoC HMIS must adopt written policies and procedures for the operation of the HMIS that apply to the 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 HMIS Lead 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.

### **5.2. Unduplicated Count**

The HMIS Lead must, at least once annually, or upon request from HUD, submit to the Arizona BoS 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.

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

The HMIS Committee will work with the HMIS Lead 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 HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Charter and Agreement with the Arizona BoS CoC, including the obligation to enter into written participation 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);
  - Longitudinal Systems Analysis (LSA); and
  - Annual Performance Reports (APRs).

## **7. 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.

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

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