

HMIS Governance

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Objectives

- To build a baseline understanding of governance in a statewide HMIS implementation
- To provide resources and tools in developing a statewide HMIS governance structure in North Carolina

Agenda

- HMIS Governance Overview
- Responsibilities of CoCs and HMIS Lead
- HMIS Governance Structure
- HMIS Governance Documents
- Next Steps

CURRENT CONTEXT: COC PROGRAM INTERIM RULE

CoC Program Interim Rule

- The CoC is responsible for designating and operating an HMIS. The CoC must:
 - Designate a HMIS software
 - Designate the HMIS Lead
 - Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS
 - Ensure consistent participation in the HMIS
 - Ensure the HMIS is administered in compliance with requirements prescribed by HUD

CoC Governance Charter

- In consultation with the collaborative applicant and HMIS Lead, the CoC must develop, follow, and update annually a governance charter.
- The governance charter includes all procedures and policies needed to comply with Subpart B of the CoC Program interim rule and with HMIS requirements as prescribed by HUD.

CoC Responsibilities

- The CoC is the primary decision-making entity that is ultimately responsible for the HMIS and must conduct appropriate oversight of the HMIS to ensure that it is compliant with the HMIS Standards and is meeting local needs

HMIS Lead Agency Responsibilities

- The HMIS Lead Agency develops plans, policies and procedures on behalf of the CoC including:
 - Data Quality Plan
 - Compliance and Monitoring Plan
- Contributing HMIS Organizations (CHO) policies and procedures

HMIS GOVERNANCE: COC AND HMIS RESPONSIBILITIES

CoC Responsibilities

- Review, revise, and approve HMIS policies
- Oversight of HMIS Lead
- Monitoring the HMIS Lead

CoC HMIS Policy Review

- The CoC has final authority to review, revise, and approve all policies and procedures that HMIS Lead is required to develop



CoC Oversight

- CoC oversight of the HMIS is established through a formal process. This process identifies the various entities that contribute to a successful HMIS and documents their responsibilities through a written Governance Charter or Agreement

CoC Monitoring

- The CoC must monitor the HMIS Lead annually
 - Maintain HMIS Lead monitoring documentation for a minimum of 5 years

HMIS Lead Responsibilities

- Reporting
- Program compliance with applicable agreements
- Victim Service Providers/Legal Service Providers
- HMIS Participation

HMIS GOVERNANCE STRUCTURE

HMIS Governance

- Joint HMIS decision making structure
- Joint HMIS policies and procedures
- Roles/responsibilities of all stakeholders:
 - CoCs
 - HMIS Lead
 - CHOS
 - End Users
 - North Carolina Governance Committee

HMIS Governance Structure

- Ensures a HMIS governance model is developed and formally documented between the HMIS Lead and the North Carolina Governance Committee
- Ensures a formal agreement outlining CoC and HMIS Lead management processes, responsibilities, decision-making structures, and oversight has been executed

HMIS Governing Committee Model

- **Primary responsibility lies with HMIS Governance Committee who directs HMIS Lead**
- Members comprised of CoC reps, HMIS Lead Agency Staff, government staff, coalition staff, participating staff, consumers
- Holds regular meetings
- Supports and protects the rights and privacy of clients

HMIS Governing Committee Model: CoC Responsibilities

- CoC responsibilities include:
 - Ensure active representation
 - Regularly reviews reporting
 - Supports HMIS by providing ongoing funding
 - Ensures HMIS is governed in accordance with CoC expectations
 - Regularly monitors HMIS Lead and participating agencies for compliance
 - Ensures agency participation

HMIS Governing Committee Model: HMIS Lead Responsibilities

- HMIS Lead responsibilities include:
 - Responds to HMIS Governance Committee directives
 - Oversees day-to-day administration of HMIS
 - Provides staffing, training, and technical support
 - Regularly reviews data quality and reports to CoC and HMIS Governance Committee

HMIS GOVERNANCE DOCUMENTS

Overview of Governance Documents

- CoC Governance Charter
 - How CoC is operated
- HMIS Memorandum of Understanding
 - How HMIS is managed by CoC
- HMIS Contract for Services
 - How payment is made by CoC to HMIS Lead Agency
- HMIS Governance Committee By-Laws
 - How GC operates and holds authority over HMIS Lead

HMIS Memorandum of Understanding

- Specifies the HMIS Lead Agency's authority and responsibility for operating the HMIS on behalf of the CoC:
 - Manages HMIS and meet HUD standards
 - Meets local standards for data quality, privacy, and confidentiality
 - Establishes governance relationships
 - Establishes procedures and timelines for terminating charter

(MCAH refers to this chart as the Joint Governance Charter)

MCAH's Memorandum of Understanding

(Referred to in MI as the Joint Governance Charter)

- Identifies who plays the roles of system admins and agency admins
- Defines what HMIS training and ongoing collaboration activities consist of
- Defines how Bowman fees are paid by CoCs

HMIS Contract for Services

- Legally binding document between HMIS Lead Agency and CoCs outlining the lead agency's services in return for CoCs' payment

“This is what the HMIS Lead Agency will do for payment”

HMIS Governance Committee By-Laws

- Establishes the authority of the HMIS Governance Committee (GC)
- Outlines the role the GC plays in coordination with CoCs and HMIS Lead Agency

HMIS Governance Committee By-Laws: Roles of Stakeholders

- Define the roles of relevant stakeholders on the GC:
 - CoCs
 - State of North Carolina
 - North Carolina Coalition to End Homelessness
 - Balance of State
 - MCAH
 - Non-CoC Stakeholders

HMIS Governance Committee By-Laws: Staffing and Voting

- Describe how GC is staffed:
 - Define composition of GC
 - Define roles of the GC Chair and Co-Chair
 - Define roles of GC workgroups and outline their responsibilities
- Outline who has voting power on the GC:
 - Do CoC alternates have voting power?
 - Do non-CoC stakeholders have voting power (e.g., State, MCAH, others)?
 - Does the BoS have multiple seats and multiple votes?

HMIS Governance Committee By-Laws: Fiduciary Role

- Define the fiduciary role and identify who plays this role:
 - How is the fee structure defined?
 - How does Bowman get paid?
 - How does MCAH get paid?
 - How does reimbursement take place if HMIS expenses come in under budget?

HMIS Governance Committee By-Laws: Other Considerations

- Outline how statewide HMIS data is released
- Define policies for lack of payment by CoC
- Define how voting takes place
- Describe process and policies for resignation/
removal of CoCs, GC members, and HMIS Lead
Agency
- Include clause for amending by-laws
- Include code of conduct for GC members

Key HMIS Governance Planning Decisions

- Role of system and agency admins at local level
- Privacy model for HMIS implementation (HMIS vs. HIPAA; informed vs. implied consent)
- Fee structure and reimbursement policies
 - Who holds Bowman contract?
- Termination policies for HMIS agreements

NEXT STEPS

Next Steps

- Additional resources
 - HMIS Governance in Statewide Environment
 - Visual Aid of HMIS Governance in Multi-CoC Environment
 - Overview of Governance Documents
- GC discuss governance decisions at next in-person meeting on March 9th

ADDITIONAL RESOURCES

Resources

- **HMIS Proposed Rule**

<https://www.hudexchange.info/resource/1967/hearth-proposed-rule-for-hmis-requirements/>

- **CoC Program Interim Rule**

<https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

Resources

- **HMIS Governance Models**

<https://www.hudexchange.info/resource/1748/hmis-governance-models/>