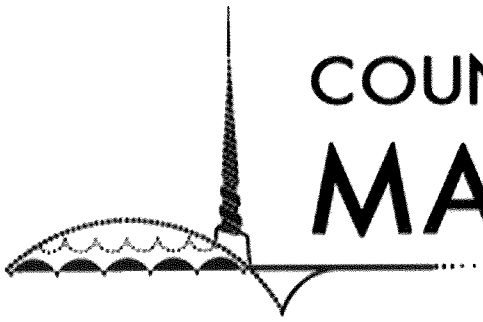

MARIN COUNTY CONTINUUM OF CARE

HOMELESS MANAGEMENT INFORMATION SYSTEM GOVERNANCE CHARTER

APPROVED NOVEMBER 2015

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EXECUTIVE SUMMARY

HMIS OVERVIEW

The United States Department of Housing and Urban Development (HUD) defines the Homeless Management Information System (HMIS) as the information system designated by the Continuum of Care (CoC) to comply with HUD's data collection, management, and reporting standards. The HMIS collects data to measure the efficacy of services provided to homeless persons and those persons at risk of homelessness. It is intended to generate unduplicated counts of homeless persons, as well as explore the nature of homelessness in general. The data collected by the HMIS are used to drive evidence-based decisions at the local, state, and national level, with the ultimate goal to eradicate homelessness in the United States.

This document outlines the Marin County CoC HMIS Governance structure that governs Marin County CoC HMIS operations, while dictating the roles and responsibilities of all parties involved. This document is to be use in tandem with the Marin County CoC HMIS Policies and Procedures Manual, which outlines the policies, procedures, guidelines, and standards for Marin County CoC HMIS operations.

MARIN COUNTY COC HMIS GOVERNANCE CHARTER

This Marin County CoC HMIS Governance aims to provide structure for decision-making, as well as formalize the roles and responsibilities of all HMIS entities. It defines the relationship between the HMIS implementation, the Marin County Continuum of Care, and the participating providers, and establishes oversight and leadership expectations surrounding the HMIS.

MARIN COUNTY COC HMIS GOVERNANCE MODEL

The Marin County HMIS Governance Group is responsible for day-to-day oversight of the CoC's HMIS. This Governance Group is composed of the following:

- CoC representatives
- HMIS Lead Agency Staff
- Participating Agency Staff and Consumers

However, in this governance model, the Homeless Policy Steering Committee (HPSC), acting in its capacity as the CoC Board, is responsible for all final decisions regarding the planning of policies and procedures, coordination of resources, data integration, determination of software applications, while also directing the HMIS lead agency.

DESIGNATIONS

MARIN COUNTY CONTINUUM OF CARE (COC)

The entity is composed of representatives of relevant organizations in the County of Marin, which generally includes nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and those persons at risk of homelessness for the County of Marin.

HMIS LEAD AGENCY AND ADMINISTRATOR (MARIN COUNTY HEALTH AND HUMAN SERVICES AGENCY)

The entity designated by the Marin County CoC to oversee the day-to-day administration of the HMIS system. The responsibilities and duties of the HMIS Lead Agency include:

- Provide agency access to the HMIS via a third-party software vendor;
- Provide for a limited number of user licenses to each participating HMIS agency;
- Provide model Privacy Notices, Client Consent forms, data collection forms, and other templates for agreements that may be adopted or adapted by individual agencies;
- Provide both initial training and periodic updates to that training for key agency staff regarding the use of the HMIS, with the expectation that the Agency will take full responsibility for conveying this information to all Agency Staff using the system;
- Provide basic user support and technical assistance for the HMIS module (i.e., general troubleshooting and assistance with standard report generation
- Provide basic user support and technical assistance for the HMIS module (i.e., general trouble-shooting and assistance with standard report generation). Access to this basic technical assistance will normally be available from 9:00 am to 5:00 pm on Monday through Friday (excluding holidays).
- Update the system to maintain compliance with the HUD Data and Technical Standards.
- Run aggregate reports for the purpose of planning and reporting to funders.
- Hold confidential reports on client data that identify specific agencies or persons, without prior agency (and where necessary, client) permission. Public reports otherwise published will be limited to presentation of aggregate data within the HMIS database.
- Annually report to HUD for Annual Homeless Assessment Report and Consolidate Plan as part of McKinney-Vento funding application.
- Produce quarterly aggregate reports and analysis.
- Ensure all recipients of funds from the Emergency Solutions Grants Program (ESG) and programs authorized by Title IV of the McKinney-Vento Act participate in HMIS.
- Develop written policies and procedures for all Covered Homeless Organizations (CHOs).
- Execute an HMIS participation agreement with each CHO.
- Serve as the applicant to HUD for any HMIS grants that will cover the CoC geographic area.
- Monitor compliance by all CHOs with the CoC.

- Submit a Security Plan, Data Plan, Data Quality Plan, and a Privacy Plan to the CoC for approval within 6 months of the finalization stage of the HMIS Requirements Proposed Rule. These documents must be reviewed and updated annually. Implementation of the policies outlined in the plans must be implemented within 6 months of the date of CoC approval of the plans.

Note: The HMIS Lead is the only organization with the authority by the CoC to make system-wide decisions regarding the HMIS. Their decisions will impact all CHOs within the continuum.

HMIS COMMITTEE

Group of entities that provide recommendations on use of software and software enhancement. At least one homeless person or formerly homeless person must participate in policymaking. Participation can include but is not limited to the following entities (as defined by HUD): governing board leadership, advisory committees, staff positions, and sub-committee positions.

HMIS SOFTWARE APPLICATION

The CoC has designated CaseWorthy Electronic Case Management software to serve as its HMIS. CaseWorthy Electronic Case Management software is a product of CaseWorthy (formerly Empowered Solutions Group), and will hereafter be referred to as the CaseWorthy System.

PARTICIPATING AGENCIES

Any agency that makes reasonable efforts to record all HUD-defined Universal Data Elements and all other required data elements as outlined by HUD funding requirements on all clients served, and discloses these data elements to the HMIS Lead Agency.

Any agency providing homeless services and wishing to participate in HMIS will complete and submit a HMIS Participation Agreement application. This application is reviewed by the HMIS Lead for approval. In the event there is a question regarding the need to participate, the application is taken to the HMIS Committee for approval/denial.

The HMIS Committee has given the HMIS Lead authorization to approve applicants to use HMIS if the HMIS Lead is confident that the applying agency is serving the homeless population.

HMIS GRANTEE

Entity responsible for soliciting, collecting, and analyzing feedback from end-users, program managers, agency executive directors, and homeless persons.

HMIS FUNDING

HMIS Leads and CHOs must refer to program regulations to determine how funds are made available. Program regulations for the HUD McKinney-Vento Act programs can be found in the regulations of Chapter V of title 24 of the Code of Federal Regulations. These regulations explain how funds are made available, and the requirements attached to those funds.

ESG & McKinney-Vento Act funding recipients and sub-recipients must participate in the CaseWorthy Marin system. Only homeless service providers receiving CoC and ESG funding can access HMIS funding.

STATUTORY AUTHORITY

The implementation of the McKinney-Vento Act in 1987 created valuable programs aimed to assist homeless persons or persons at risk for homelessness regain independence and stability. However, despite its promising beginnings, the McKinney-Vento Act, and the programs it fostered, operated without measurement of efficacy for over 15 years; no government entity conducted a comprehensive review. Therefore, in 2001, Congress enlisted the U.S. Department of Housing and Urban Development (HUD) to enforce the requirement that every jurisdiction present to Congress unduplicated client-level data within three years.

HUD formulated a strategic plan to test the efficacy of the McKinney-Vento Act while also improving data collection, reporting, and analysis at the local and national levels. Their strategy consisted of four approaches:

- They established funding for the implementation and maintenance of HMIS.
- They created a technical assistance program to assist jurisdictions in their data collection, analysis, and reporting efforts.
- They initiated the development of the nationwide Annual Homeless Assessment Report (AHAR) as means to present to Congress collective homeless data from individual jurisdictions nationwide.
- They began to analyze the most viable approaches to obtaining homeless client-level reporting

This plan amplified competition among CoCs as they strived to obtain homeless assistance funding. As the importance of HMIS applications increased, so did their complexity and sophistication.

CoCs became increasingly aware of the data collection and reporting requirements imposed by Congress, and in 2004, HUD submitted their Third Progress Report to Congress. As a result, Congress and HUD implemented the first HMIS Data and Technical Standards Final Notice. This Notice made the implementation and maintenance of HMIS mandatory to obtain Federal funding for homeless relief efforts.[4] In 2010, the HMIS requirements were further modified. Currently, CoCs are awaiting the implementation of the upcoming HMIS Requirements Proposed Rule.

Collectively, these provisions provide statutory requirements for this governance charter, which aims to organize the accurate collection and reporting of comprehensive data regarding the characteristics and needs of homeless persons and those at risk of homelessness.

POLICIES & PROCEDURES

The following policies and procedures are primarily derived from the 2004 HMIS Data and Technical Standards: Final Notice and the 2010 HMIS Data Standards: Revised Notice.

Note that this governance charter will be updated upon the finalization of the HMIS proposed rule.

This section is comprised of six (6) sections:

1. Planning & Software Selection
2. HMIS Management & Operations: Governance & Management
3. HMIS Management & Operations: Compliance Monitoring
4. HMIS Management & Operations: Data Quality
5. HMIS Development & Oversight
6. Other Federal Requirements

1. PLANNING

The following policies and procedures are derived from the most recent HUD HMIS Requirements.

1.1 HMIS PLANNING & STRATEGIC ACTIVITIES

Development of activities related to HMIS growth. These activities will be reviewed regularly, and remain in accordance with the CoC's goals.

RESPONSIBLE PARTY: HMIS LEAD

1.2 HMIS PROGRAM MILESTONES DEVELOPMENT

Identification of general milestones for project management, including training, expanded system functionality, etc.

RESPONSIBLE PARTY: HMIS LEAD

1.3 UNIVERSAL DATA ELEMENTS

HMIS must be equipped to manage the collection of each data variable and corresponding response categories for the Universal Data Elements as outlined in the 2010 HMIS Data and Technical Standards.

Although HUD strives to ensure that the HMIS remains *"a system of accuracy, integrity, and confidentiality"* they are aware that excessively stringent technical, security, and data standards may limit the ability of CoCs to adapt to beneficial changes in technology. Therefore, the standards listed in the following section are broad in nature. HUD states they will provide specific details applicable to each area in a separate notice and public comment process, thus enabling them to be more responsive to changes in technology.

Proposed Requirements:

- HMIS must be capable of unduplicating client records, must contain fields that collect all HUD-required data elements, and must maintain historical data
- HMIS must generate Standard HUD Reports, Data Quality Reports, and Audit Reports

RESPONSIBLE PARTY: HMIS LEAD

1.4 PROGRAM-SPECIFIC DATA ELEMENTS

HMIS manages the collection of each data variable and corresponding response categories for the Program-Specific Data Elements as outlined in the 2010 HMIS Data and Technical Standards.

RESPONSIBLE PARTY: HMIS LEAD

1.5 UNDUPLICATED CLIENT RECORDS

HMIS generates a summary report of the number of unduplicated client records that have been entered into the HMIS.

RESPONSIBLE PARTY: HMIS LEAD

1.6 APR REPORTING

HMIS is consistently able to produce a reliable Annual Performance Report (APR).

RESPONSIBLE PARTY: HMIS LEAD

1.7 AHAR PARTICIPATION

Participation in the AHAR (Annual Homeless Assessment Report) is ensured.

RESPONSIBLE PARTY: HMIS LEAD

1.8 HMIS REPORTS

HMIS generates clients-served reports, utilization summary reports, and demographic reports at both the system and program levels for the purpose of understanding the nature and extent of homelessness.

RESPONSIBLE PARTY: HMIS LEAD

2. HMIS MANAGEMENT & OPERATIONS: GOVERNANCE & MANAGEMENT

2.1 HMIS GOVERNANCE STRUCTURE

Development of a HMIS governance model that is formally documented between the HMIS Lead Agency/grantee and the community planning body(ies). This document is to be a formal agreement that outlines management processes, responsibilities, decision- making structures, and oversight of the HMIS. Adherence to the agreement is to be regularly monitored (as evidenced by a Memorandum of Understanding, Letter of Agreement, or similar such documentation).

HMIS Governance Standards:

- HMIS Lead is responsible for development of local HMIS policies and procedures
- HMIS Lead and CHO are responsible for ensuring that HMIS processing capabilities coincide with the privacy obligations of the CHO
- HMIS Lead must conduct annually (at minimum) an unduplicated count of clients served and an analysis of unduplicated amounts. This information is to be presented to the CoC and when requested by HUD
- HMIS Lead must submit reports to HUD as required
- CHO must comply with applicable standards from HMIS Requirements Proposed Rule
- CHO must comply with federal, state, and local privacy laws. If a privacy or security standard conflicts with other federal, state, and local laws, the CHO and HMIS Lead are jointly responsible for updating the policies and procedures.
- HMIS Lead must develop a privacy policy
- HMIS Lead must ensure HMIS vendor acts in accordance with HMIS standards issued by HUD

RESPONSIBLE PARTY: COC

2.2 HMIS OVERSIGHT INCLUSIVE PARTICIPATION

Membership of the HMIS Committee is inclusive of decision makers representing the Marin CoC and community.

RESPONSIBLE PARTY: COC

2.3 HMIS IT ISSUE MONITORING (COMMUNITY LEVEL)

HMIS System service requests, activities, deliverables and resolutions are reviewed on a regular basis. When necessary, authoritative support is provided to expedite IT issue resolution.

RESPONSIBLE PARTY: HMIS LEAD

2.4 HMIS TECHNICAL SUPPORT

Technical expertise that is commensurate with the general HMIS program oversight is provided in addition to timely support on high level technical matters. All necessary HMIS software changes in response to the changing requirements of participating agencies are reviewed and authorized. All general special issues presented by participating agencies are reviewed and authorized.

RESPONSIBLE PARTY: HMIS LEAD

2.5 HMIS SOFTWARE TECHNICAL SUPPORT

Technical expertise commensurate with the requirements of the HMIS software and/or system is provided; Timely support on software technical matters is provided; Authorized changes to the HMIS software and processes are implemented; Resolutions to any special issues authorized by the HMIS Technical Support Entity within the software and/or overall system are implemented.

RESPONSIBLE PARTY: HMIS LEAD

2.6 HMIS IT ISSUE TRACKING

An updated list of HMIS system service requests, activities, deliverables, and resolutions is maintained on a regular basis.

RESPONSIBLE PARTY: HMIS LEAD

2.7 HMIS STAFF ORGANIZATION CHART

A current and accurate organization chart that clearly identifies all team members, their roles and responsibilities, and general work activities/functions is maintained on a regular basis. This organization chart is made available for review.

RESPONSIBLE PARTY: HMIS LEAD

2.8 HMIS SOFTWARE TRAINING

Regular training on software usage, software and data security, and data entry techniques to participating agencies is provided. The development, updating, and dissemination of data entry tools and training materials occur on a regular basis. The system is monitored and ensured on a regular basis.

User Training: CaseWorthy will provide training to instruct the CaseWorthy System Administrator in the proper procedures required to supervise and maintain the operation of the HMIS. System Administration training will cover security, configuration, and user customization.

End User Training Schedule: The HMIS Lead will provide training in the day-to-day use of the Marin system. Training class size will be offered as needed.

RESPONSIBLE PARTY: HMIS LEAD

2.9 SYSTEM OPERATION & MAINTENANCE

Operation and maintenance of the HMIS System is conducted on a daily basis.

RESPONSIBLE PARTY: HMIS LEAD

2.10 HMIS USER FEEDBACK

Mechanisms for soliciting, collecting, and analyzing feedback from end users, program managers, agency executive directors, and homeless persons are managed and maintained. Feedback includes impressions of operational milestones and progress, system functionality, and general HMIS operations.

RESPONSIBLE PARTY: HMIS LEAD

3. HMIS MANAGEMENT & OPERATIONS: COMPLIANCE MONITORING

3.1 HMIS MANAGEMENT ISSUES

HMIS is managed in accordance to the policies, protocols, and goals of the Marin CoC.

RESPONSIBLE PARTY: COC

3.2 AGENCY AND PROGRAM HMIS PARTICIPATION

Program- and agency-level participation in HMIS is monitored on a regular basis via the comparison of point-in-time census of beds/slots to clients served. Agencies report all findings to the Marin CoC.

RESPONSIBLE PARTY: COC

3.3 DATA AND SYSTEM SECURITY

Agency staff are instructed and required to adhere to the HMIS data and system security protocols as outlined by the CoC and the most current HUD HMIS Data and Technical Standards.

HMIS Security Standards:

- HMIS Lead must establish a security plan that is approved by the CoC
- HMIS Lead must designate a security officer
- HMIS Lead must report security incidents
- HMIS Lead must establish a disaster recovery plan
- HMIS Lead must conduct an annual service review
- HMIS Lead must ensure that each CHO designates a security officer
- HMIS Lead must ensure that each user completes user training (at the minimum annually)
- HMIS Lead must ensure that each CHO conducts an annual security review

RESPONSIBLE PARTY: HMIS LEAD

3.4 CLIENT CONSENT

Client consent is obtained and documented according to the Client Consent Policies and Protocols of the Marin CoC.

Interagency Data Sharing Agreements: Agencies that will be sharing client specific records must agree in writing to uphold specified minimum standards of privacy protection.

Written Client Consent Procedure For Data Entry: Agencies must obtain the client's consent prior to entering information concerning a client into the system. If a client does not consent, services should not be denied to the client. The agency can use the anonymous client function in appropriate cases.

Confidentiality And Consent Forms: Agencies must use the forms approved by the HMIS Committee. Agencies that share protected health information must have internal procedures for obtaining client consent prior to the sharing of this information.

Privacy Notice: Agencies must develop a privacy notice, and incorporate the CaseWorthy Privacy Notice into its policies and procedures. In addition, HUD mandates that organizations develop policies and procedures to distribute privacy notices to their employees, which include having employees sign to acknowledge receipt of the notices.

RESPONSIBLE PARTY: PARTICIPATING AGENCY

4. HMIS MANAGEMENT & OPERATIONS: DATA QUALITY

4.1 DATA QUALITY STANDARDS

Community level data quality plan and standards are developed and enforced. A standard interview protocol that facilitates the collection of required data elements is developed. These standard interview protocols include standardized intake as well as standardization of all subsequent interviews.

Data Quality Standards:

- Minimum Bed Coverage Rates: Measures the level of lodging project providers' participation in HMIS. Must be calculated separately for emergency shelter, transitional housing, and permanent housing.
- Divide the number of HMIS participating by the total number of year-round beds in the CoC geographical area.

- Service-Volume Coverage Rates: Service-Volume coverage rate will all calculation of the coverage rate for a HUD-defined category of projects that do not offer overnight accommodations, such as homelessness prevention projects or street outreach projects. Must be calculated for each comparable database.
- Divide the number of persons served annually by the projects that participate in the HMIS by the number of persons served annually by all CoC projects within the HUD-defined category.
- HMIS Lead must develop and implement a Data Quality Plan. HMIS must be able to generate reports monitoring data quality.

HMIS Leads and CHOs must refer to applicable program regulations in regards to the length of time records are to be maintained and monitored. While the HMIS Lead is permitted to archive the data in HMIS, they must follow HUD archiving data standards.

RESPONSIBLE PARTY: CREATION: COC; ENFORCEMENT: ALL ENTITIES

4.2 UNIVERSAL DATA ELEMENTS

Data quality reports are regularly reviewed at community planning level. These data quality reports generate information that covers data entry completion, consistency with program model, and timeliness as compared to the community data quality standards. All standardized interview protocols adhere to the Universal Data Elements requirements.

The Universal Data Elements will be collected and/or verified per HUD procedure at initial intake and any subsequent program enrollment, and then entered into the HMIS within a specified period of time following the collection of the data.

RESPONSIBLE PARTY: PARTICIPATING AGENCY

4.3 PROGRAM SPECIFIC DATA ELEMENTS

The collection of each data variable and corresponding response categories specific to their program type on all clients served by McKinney-Vento funding is ensured. All standardized interview protocol prescribed by HUD is followed.

The Program-Specific Data Elements are collected and/or verified per HUD procedure at initial intake and any subsequent program enrollment, and then entered into the HMIS within a specified period of days from the collection of the data.

Reporting agencies are required to report program entry and exit dates upon the entry or exit of program participants. Entry dates should record the first day of service or program entry with a new program entry date for each period/episode of service. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter or the last day a service was provided.

RESPONSIBLE PARTY: PARTICIPATING AGENCY

4.4 DATA QUALITY REPORTS – TECHNICAL ASSISTANCE

Data quality reports that indicate levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards are disseminated to participating programs. Technical assistance and training needs are determined according to these reports.

RESPONSIBLE PARTY: HMIS LEAD

4.5 DATA QUALITY REPORTS TO PLANNING ENTITY

Data quality reports that indicate cross program levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards are disseminated to the community planning entity on a regular basis.

RESPONSIBLE PARTY: COC – HMIS COMMITTEE

4.6 META DATA ELEMENTS

Meta Data Elements are defined as elements of information that describes an item; they are not the item itself. Meta Data Elements do not actually appear on the screen, but instead describe the data fields that do appear on the screen. Thus, Meta Data Elements are an integral and automated component of the data collection process. Examples of Meta Data Elements include:

- Data Created
- Data Updated
- Data Collection Stage
- Information Update
- Project Identifier
- Project Entry Identifier
- User

Requirements: Each data variable and corresponding response categories specific to their program type on all clients served by McKinney-Vento funding are collected through proper data collection. All standardized interview protocol adheres to the most current HMIS requirements. Therefore, the Meta Data Elements are collected and/or verified per HUD procedure at initial intake and any subsequent program enrollment, and entered into the HMIS within a specified period of time following the collection of the data.

RESPONSIBLE PARTY: PARTICIPATING AGENCY

5. HMIS POLICY DEVELOPMENT & OVERSIGHT

5.1 PARTICIPATION RATES

HMIS coverage rates of the Marin CoC are reviewed and monitored on a regular basis. Agencies with coverage rates lower than 75% participation are required to provide explanation for the barriers to implementation. Ongoing engagement activities and barrier resolution with non-participating agencies is required.

RESPONSIBLE PARTY: HMIS LEAD

5.2 CLIENT CONFIDENTIALITY & PRIVACY TRAINING

Training on client confidentiality and privacy requirements are provided to intake staff, data entry staff, and reporting staff at all participating agencies on a regular basis. All agencies have sufficient privacy policies and protocols in place.

RESPONSIBLE PARTY: HMIS LEAD

5.3 PERFORMANCE MEASUREMENT TRAINING

Regular training and guidance on program performance measurement is provided.

RESPONSIBLE PARTY: HMIS LEAD

5.4 PARTICIPATING AGENCY DOCUMENTATION

The number of participating agencies (utilizing the system) is maintained and documented on a regular basis. A comparative analysis of planned versus actual deployments at the project level is highly desired but not compulsory.

RESPONSIBLE PARTY: HMIS LEAD

5.5 PARTICIPATION RATES

Regular reports on HMIS participation rates is provided to Marin CoC. An analysis of agency-specific barriers with potential solutions is highly desired but not compulsory.

RESPONSIBLE PARTY: COC

5.6 POLICIES & PROCEDURES

HMIS Policies and Procedures are fully documented and available.

RESPONSIBLE PARTY: HMIS LEAD

5.7 AGENCY PARTICIPATION AGREEMENT

Written agreements that describe the protocols for participation in the HMIS are established with participating agencies.

RESPONSIBLE PARTY: HMIS LEAD

5.8 DATA SHARING AGREEMENTS

Written agreements with participating agencies who share client level data are maintained. These agreements describe the level of data element or program information sharing among the data sharing HMIS agencies.

Sharing Of Information: Clients must consent to the sharing of their information prior to that information being shared with participating agencies. In the event that the client agrees to have their information entered into the

HMIS, but does not agree to have it shared with other agencies, the user can make the client record anonymous by using the 'Private Option'.

Sharing Protected Information: A separate Release of Information (ROI) indicating what information the client agrees to have shared with other participating agencies must be signed prior to sharing of any Protected Personal Information (PPI).

Printed Information: Any printed records that are disclosed to the client or another party should indicate: the person and/or agency to whom the record is directed, the date, and the initials of the person making the disclosure.

Requests For HMIS Client Information: The agency must notify the HMIS Program Administrator within one working day when the agency receives a request from any individual or outside organization for client-identifying information.

Case Notes: It is understood that client case notes will not be shared, and that each agency will have the ability to enter its own private notes about a client. The Release of Information (ROI) form will be a dated document that expires. The provider will only be able to access the information specified on the ROI that was entered into the system during the time the ROI was in effect. Also, the client can decide at any time that they want to have their information closed, in full or in part, and/or client file deactivated.

RESPONSIBLE PARTY: HMIS LEAD

5.9 HMIS END-USER AGREEMENT

A written agreement with each authorized user of the HMIS is maintained. This agreement defines participation protocols, including training criteria, consent protocols, system use, and privacy and security standards.

RESPONSIBLE PARTY: HMIS LEAD

5.10 DATA RELEASE

The CoC maintains a defined and documented HMIS data release protocol that governs release of all data from the HMIS.

RESPONSIBLE PARTY: COC

5.11 PROGRAM TRAINING & ORIENTATION

All required CaseWorthy Marin participants pertaining to HMIS standards receive training and orientation on regulations regarding McKinney-Vento funding.

RESPONSIBLE PARTY: COC

5.12 CLIENT CONSENT

The CoC has a defined and documented client consent protocol to be used as a baseline practice among all participating HMIS users.

RESPONSIBLE PARTY: COC

6. OTHER FEDERAL REQUIREMENTS

6.1 DRUG-FREE WORKPLACE

The HMIS Grantee adopts and enforces a drug-free workplace policy. The policy is posted and available for review.

RESPONSIBLE PARTY: HMIS GRANTEE

6.2 CONFLICT OF INTEREST

The HMIS Grantee adopts a conflict of interest policy for board members, staff, and volunteers.

RESPONSIBLE PARTY: HMIS GRANTEE

6.3 EQUAL OPPORTUNITY & NON-DISCRIMINATION POLICY

The HMIS Grantee adopts an equal opportunity and non-discrimination policy.

RESPONSIBLE PARTY: HMIS GRANTEE

On behalf of CoC:

Signature: _____
CoC Board Chair

Date: 11/6/15

On behalf of Collaborative Applicant/HMIS Lead:

Signature: _____

Date: 11/10/15