

October, 2013



CLARITY
HUMAN SERVICES

HMIS Requirements Proposed Rule:

Summary of Proposed Amendments

White Paper

A summary outlining the proposed amendments to HMIS standards

(702) 605.6870

(888) 866.1533

www.clarityhs.com



INTRODUCTION

In December 2011, HUD published the Proposed Rule for HMIS Requirements.^[1] This publication was a component of HUD's initiative to implement the Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, which calls for the establishment of standards related to Homeless Management Information Systems (HMIS).^[2]

This Proposed Rule for HMIS Requirements is not yet in effect, and HUD still enforces the HMIS standards that are currently in place (the 2004 Technical Standards and the 2010 Data Standards^[3]). However, HUD advises communities nationwide to begin planning and preparation processes for the upcoming amendments to the HMIS standards.

The purpose of this white paper is to provide a brief history of the HMIS Initiative, as well as summarize the key potential amendments that CoCs may be facing in the near future.

TABLE OF CONTENTS

Executive Summary	1
Background	1
Immediate Preparation Recommendations	3
Proposed Amendments to HMIS	4
General Provisions	4
HMIS Administration	5
Eligible Activities	7
HMIS Governance, Technical, Security, & Data Quality Standards	10
Additional Proposed Amendments	13
Consolidated Planning for Community Planning & Development Programs	13
Emergency Solutions Grants Program	13
Shelter Plus Care Program	16
Supportive Housing Program	16
Conclusion	18
References	19
HMIS Proposed Definition (580.3)	20

1. EXECUTIVE SUMMARY

1.1 Background

The Homeless Management Information System (HMIS) Initiative has roots that extend as far back as the early 1980s, when the prevalence of homelessness in the U.S. began to increase. This rapid expansion roused the concern of the general public, however the Reagan Administration did not perceive the problem to be one warranting government intervention. Thus, initial efforts occurred only at the grassroots level.

Despite these local efforts, homelessness continued to become a widespread problem in the United States. Finally, in 1987, it instigated the response of the Reagan Administration, who responded with the implementation of the McKinney-Vento Act.^[4]

The McKinney-Vento Act created valuable programs that helped countless Americans to regain independence and stability. However, despite its hopeful beginnings, the effectiveness of the McKinney-Vento Act, and the programs it fostered, remained untested for over 15 years; no government entity conducted a comprehensive review or analysis of the extent of homelessness, or how to address it.^[5]

In 2001, Congress noted this problem, and 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.^[5]

In August 2001, the U.S. Department of Housing and Urban Development (HUD) presented to Congress a strategic plan to improve homeless data collection, reporting, and analysis at the local and national levels, as well as test the effectiveness of the McKinney-Vento Act.^[5]

Their strategy consisted of four approaches:^[5]

1. They established funding for the implementation and maintenance of HMIS.
2. They created a technical assistance program to assist jurisdictions in their data collection, analysis, and reporting efforts.
3. 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.
4. They began to analyze the most viable approaches to obtaining homeless client-level reporting

As CoCs continued to strive to earn homeless assistance funding, HUD's HMIS Initiative took flight. Over the next decade, HMIS applications increased in their complexity and sophistication. Their development was driven by advances in technology, and by the input of HMIS vendors and users alike. As more CoCs became aware of the requirements outlined by Congress, and the funding that accompanies quality HMIS applications, they began to take the HMIS concept into serious consideration.^[4] In 2001, only 23 percent of CoCs indicated they were implementing a HMIS. By the time HUD submitted their Third Progress Report to Congress in 2004, this number had jumped to 61 percent.^[6] In 2004, the effectiveness of the HMIS had become so apparent that 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.^[3]

The HMIS Initiative has continued to evolve, the most recent shift being the upcoming implementation of the HMIS Requirements Proposed Rule.^[1] While this Notice was intended to solicit public comment on proposed HMIS requirements, its implementation is looming, and CoCs need to be prepared; certain practices that HUD had previously provided only as guidance will soon become mandatory once the rule goes into effect.

With this proposed rule, HUD establishes standardized regulations for HMIS activities, while also making corresponding amendments to the following program regulations:

- Consolidated Submissions for Community Planning & Development Programs
- Emergency Solutions Grants Program
- Shelter Plus Care Program
- Supportive Housing Program

With this regulatory framework, HUD aims to achieve uniform technical requirements, improve collection and maintenance of data, and ensure the confidentiality of client information.

1.2 Immediate Preparation Recommendations

Although the HMIS Requirements Proposed Rule is not currently in effect, HUD strongly recommends that CoCs do not wait until the finalization of the Notice to do the following:^[1]

- Hire security officers
- Finalize security plans
- Finalize implementation plans for security and technical standards
- Finalize a data quality plan – While HUD advises communities to discuss data quality and set data quality benchmarks, HUD advises against finalizing a plan until the final Data Quality and Software Functionality Notice is published.

The following sections discuss how the HMIS Requirements Proposed Rule might affect HMIS activities, as well as its potential impact on the core HUD programs listed above. Each section discusses associated proposed amendments.

2. PROPOSED AMENDMENTS TO HMIS

2.1 General Provisions

2.1a. HMIS Purpose

According to the HMIS Requirements Proposed Rule, a HMIS must 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. Such information includes:

Aggregation of HMIS Data for the following four purposes:

1. Obtain information on the extent and nature of homelessness over time
2. Produce an unduplicated count of homeless persons
3. Understand patterns of service use
4. Measure the effectiveness of homeless assistance projects and programs

HMIS Information is to be used for 3 purposes:

1. Reporting to HUD
2. To be utilized by HUD and other Federal agencies to report to Congress, evaluate the performance of funding recipients, and any other specifications by HUD through Notice
3. To inform the public to raise awareness and enhance local planning processes.

*Text in this section adapted from Federal Register/Vol 76. No. 237^[1]

2.1b. HMIS Scope

Recipients of financial assistance from the following sources will be required to use HMIS to collect client-level data on all persons served:

- Continuum of Care program
- Emergency Solutions Grant program
- Rural Housing Stability Assistance (RHS) program
- Any HUD programs previously funded under the McKinney-Vento Act:
 - Supportive Housing Program
 - Shelter Plus Care program
 - Section 8 Single Room Occupancy
 - Moderate Rehabilitation program

The HMIS Requirements Proposed Rule states any “...homeless and nonhomeless projects not funded under the McKinney-Vento Act may participate in the local HMIS, and must follow HMIS regulations and any additional requirements as may be issued by notice, in accordance with the Paperwork Reduction Act.”^[1].

2.2 HMIS Administration

This section discusses how the HMIS Requirements Proposed Rule might affect the responsibilities of the CoC and the HMIS Lead.

2.2a Responsibilities for HMIS Administration

The CoC is now fully responsible for ensuring that activities surrounding HMIS management and administration are in accordance with the new regulations and other applicable laws.

2.2b Required Duties of the CoC

- Designate a single information system as the official HMIS software for the geographic area
- Designate the HMIS Lead (which may be itself) who must be an instrumentality of state or local government, or a private nonprofit organization.
- Develop a governance charter and document all assignments and designations consistent with the governance charter. At minimum, this governance charter must include:
 - Requirement that HMIS Lead enter into written HMIS Participation Agreement(s) with each CHO, and impose sanctions for any CHO that does not comply
 - HMIS Participation Fee
- Maintain documentation of compliance with duties of the CoC and the governance charter

CoC is responsible for reviewing, revising, and approving all policies and plans developed by the HMIS Lead.

2.2c Multi-Continuum HMIS

The HMIS Requirements Proposed Rule also states that a CoC may choose to participate in HMIS with one or more other CoCs, but must act in accordance with the following rules:

- Designate the same HMIS software
- Designate the same HMIS Lead
- Adopt a joint HMIS Governance Charter and adhere to the same technical, security, privacy, and data quality standards

HMIS must report unduplicated data for each CoC separately.

2.2d Duties of HMIS Lead

- Ensure all recipients of funds from the Emergency Solutions Grants Program 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 within 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

2.3 Eligible Activities

2.3a Funding for HMIS

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.^[7] These regulations explain how funds are made available and the requirements attached to those funds.

2.3b Emergency Solutions Grants Interim Rule

Along with the publication of the HMIS Requirements Proposed Rule,^[1] HUD is also publishing the Emergency Solutions Grants Interim Rule.^[8] HUD expects to publish the proposed rules for the new programs created by the HEARTH Act amendments to the McKinney-Vento Act shortly. Those rules will control the extent to which grant funds can be used for the costs of carrying out HMIS activities.

2.3c Eligible Activities

Activities to be conducted by HMIS Lead

- Host and maintain HMIS software or data
- Backup, recovery, and repair of the HMIS software or data
- Upgrade, customize, and enhance the HMIS
- Integrate and warehouse data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems
- System administration
- Report to providers, the CoC, and HUD
- Conduct training for recipients on the use of the system, including the reasonable cost of travel to the training
- Such additional activities as may be authorized by HUD in notice

Activities to be conducted by HMIS Lead & CHOs

- Purchase, lease, or license computer hardware and software
- Purchase or lease equipment, including telephones, faxes, and furniture
- Pay for technical support
- Lease office space
- Pay for electricity, gas, water, phone service, and high-speed data transmission costs necessary to operate and participate in the HMIS
- Pay salaries for operating HMIS, which includes:
 - I. Data entry
 - II. Monitor and review data quality
 - III. Data analysis
 - IV. Report to the HMIS Lead
 - V. Attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Act
 - VI. Conduct training for CHOs on the HMIS or comparable databases

VII. vii. Travel to conduct intake and to attend training

VIII.viii. Implement and comply with HMIS requirements

- Pay the participation fee to the HMIS Lead that is established by the CoC in the governance charter
- If the CHO is a victim services provider, as defined under 24 CFR 580.3, or a legal services provider, establish and operate a comparable database that complies with 24 CFR 580.25
- Such other activities as authorized by HUD in Notice.

NOTE: the operation of comparable databases is considered an eligible HMIS activity

2.3d ESG & McKinney-Vento Act Funding Recipients & Subrecipients

All recipients and subrecipients of ESG grant funds under McKinney-Vento Act programs must participate in the HMIS used by their CoC.

2.3e Comparable Databases

HUD stresses the importance of adopting existing regulations surrounding comparable databases for victim service providers and legal service providers. They claim that information from these providers will improve CoC collaboration and the evaluation of system-wide performance, stating: *"A comparable database allows the collaborative applicant and Continuum to obtain the aggregate data needed while respecting the sensitive nature of the client-level information if it complies with all HMIS data technical, and security standards..."*

- Victim service providers are prohibited from directly entering or providing data into a HMIS if they are not permitted to participate in HMIS. Instead they must use a comparable database (see below for standards)
- Legal service providers are permitted to not utilize HMIS if conditions render necessary to protect attorney-client privileges
- Standards for Comparable Databases:
 - The comparable database must meet the standards of this part and comply with all HMIS data information, security, and processing standards, as established by HUD in Notice.

- The comparable database must meet the standards for security, data quality, and privacy of the HMIS within the CoC. The comparable database may use more stringent standards than the CoC's HMIS

For more information on standards for comparable database for both victim service providers and legal service providers refer to: The Notice of Allocation, Application Procedures, and Requirements for Homelessness Prevention and Rapid Re-Housing Program Recipients and subrecipients under the American Recovery and Reinvestment Act of 2009 (HPRP Notice).^[9] .

NOTE: The proposed rule also states: *"Participation in HMIS by recipients and subrecipients of Emergency Solutions Grants program funds is statutorily required."*

2.4 HMIS Governance, Technical, Security, & Data Quality Standards

In effort to ensure that HMIS applications maintain the integrity and confidentiality of client data, HUD requires that HMIS be administered and operated according to stringent data quality and security standards.

2.4a 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.

*Text in this section adapted from Federal Register/Vol 76. No. 237^[1]

- HMIS Lead must develop a privacy policy
- HMIS Lead must ensure HMIS vendor acts in accordance with HMIS standards issued by HUD.

2.4b Technical, Security, & Data Standards

HMIS 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

HMIS Security Standards

- Proposed Requirements:
 - HMIS Lead must establish a security plan that is approved by the CoC
 - HMIS Lead must designate a security officer.
 - HMIS Lead must conduct workforce security screening
 - 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 and conducts workforce security measures

- HMIS Lead must ensure that each user completes security training (at the minimum annually)
- HMIS Lead must ensure that each CHO conducts an annual security review

Data Quality Standards:

- Proposed Requirements:
 - HMIS Leads must set data quality benchmarks for CHOs separately for lodging and non-lodging projects.
 - Minimum Bed Coverage Rates: Measures the level of lodging project* providers' participation in HMIS. Must be calculated separately for emergency shelter, safe haven, 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 allow 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.
 - All HMIS Leads must develop and implement a Data Quality Plan. HMIS must be able to generate reports monitoring data quality.

2.4c Maintaining & Archiving Data

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.

**Please see 6. HMIS Proposed Definitions*

3. ADDITIONAL PROPOSED AMENDMENTS

3.1 Consolidated Submissions for Community Planning & Development Programs

Aged, Grant programs—housing and community development, Homeless, Individuals with disabilities, Low- and moderate-income housing, Reporting and recordkeeping requirements.

3.1a Proposed Requirements

The definition of 'HMIS' is revised to read:

"The information system designated by the Continuum of Care to comply with the requirements of 24 CFR part 580 and used to record, analyze, and transmit client and activity data in regard to the provision of shelter, housing, and services to individuals and families who are homeless or at risk of homelessness."

3.2 Emergency Solutions Grants Program

Community facilities, Emergency solutions grants, Grant programs— housing and community development, Grant program—social programs, Homeless, Reporting and recordkeeping requirements.

3.2a Amendments to Definitions

The definition of 'HMIS' is revised to read:

"The information system designated by the Continuum of Care to comply with 24 CFR part 580 and used to record, analyze, and transmit client and activity data in regard to

*Text in this section adapted from Federal Register/Vol 76. No. 237^[1]

the provision of shelter, housing, and services to individuals and families who are homeless or at risk of homelessness.”

The definition of ‘HMIS Lead’ is revised to read:

“The entity designated by the Continuum of Care in accordance with 24 CFR part 580 to operate the Continuum’s HMIS on the Continuum’s behalf.”

3.2b Eligible Costs for HMIS

ESG funding recipient or recipients are permitted to use ESG funds to pay the costs of contributing data to the HMIS utilized by their CoC. This includes the cost of the following:

- Purchase/leasing computer hardware, software, software licenses, equipment such as telephones, faxes, and furniture
- Obtaining technical support
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to run the HMIS
- Paying salaries for operating HMIS including data entry, monitoring and reviewing data quality, completing data analysis, reporting to HMIS Lead, training staff for HMIS or comparable database, and implementing and complying with HMIS requirements
- Costs of staff to attend HUD-Sponsored and HUD-Approved training on HMIS and any other programs authorized by the McKinney-Vento Act.
- Cost of reporting to HMIS Lead
- Staff training for HMIS or comparable database
- Implementation and compliance with HMIS requirements

HMIS Lead may use ESG funds to pay for the following:

- Hosting/maintaining HMIS software and/or data
- Backup and recovery of HMIS data and HMIS software or data repair
- Upgrades, customization, and enhancement of HMIS
- Integration and warehousing of data, including the cost of data warehouse development
- System administration

- Reporting to providers, CoC, and HUD
- Conducting training or comparable database (including travel costs)

Subrecipients that are a victim services provider or legal services provider, may use ESG funds to establish and operate a comparable database.

3.2c Area-Wide Systems Coordination Requirements: Participation In HMIS

Revised, stating that recipients must ensure all data collected for persons served and activities supported by ESG funds must be entered into the HMIS or comparable database that is applicable to the CoC's geographical location within which those persons and activities are located in accordance to HMIS requirements.

3.2d Recordkeeping & Reporting Requirements

ESG funding recipients must follow written intake in accordance with the most recent definition of homelessness. All intake documentation must reflect the evidence used to verify homeless status. The order of priority for obtaining evidence is as follows:

- Third-party documentation: Lack of third-party documentation does not disqualify a person or family from being immediately admitted to emergency shelter, receiving street outreach, or receiving shelter/services provided by a victim service provider.
- Intake worker observations
- Certification from the person seeking assistance: Should third-party documentation not be available, a certificate or other appropriate service transaction recorded in an HMIS or other comparable database is sufficient evidence of third-party documentation and intake worker observations.

3.2e Client Information Confidentiality

The records containing protected identifying information for any individual or family who receives or applies for ESG assistance is to be kept secure and confidential.

3.3 Shelter Plus Care

Homeless, Rent subsidies, Reporting and recordkeeping requirements, Supportive housing programs—housing and community development, Supportive services.

3.3a Recordkeeping & Reporting Requirements

Shelter Plus Care Program funding recipients must follow written intake in accordance with the most recent definition of homelessness. All intake documentation must reflect the evidence used to verify homeless status. The order of priority for obtaining evidence is as follows:

- Third-party documentation: Lack of third-party documentation does not disqualify a person or family from being immediately admitted to emergency shelter, receiving street outreach, or receiving shelter/services provided by a victim service provider.
- Intake worker observations
- Certification from the person seeking assistance: Should third-party documentation not be available, a certificate or other appropriate service transaction recorded in an HMIS or other comparable database is sufficient evidence of third-party documentation and intake worker observations.

3.4 Supportive Housing Program

Homeless, Rent subsidies, Reporting and recordkeeping requirements, Supportive housing programs—housing and community development, Supportive services.

3.4a Recordkeeping & Reporting Requirements

Supportive Housing Program funding recipients must follow written intake in accordance with the most recent definition of homelessness. All intake documentation must reflect the evidence used to verify homeless status. The order of priority for obtaining evidence is as follows:

- Third-party documentation: Lack of third-party documentation does not disqualify a person or family from being immediately admitted to emergency shelter, receiving street outreach, or receiving shelter/services provided by a victim service provider.
- Intake worker observations
- Certification from the person seeking assistance: Should third-party documentation not be available, a certificate or other appropriate service transaction recorded in an HMIS or other comparable database is sufficient evidence of third party documentation and intake worker observations.

4. CONCLUSION

In August 2012, HUD introduced the CoC Interim Rule, which calls for Centralized Intake and Coordinated Assessment.^[10] This rule provides CoCs with the opportunity to develop common processes for providing consistent homeless prevention, diversion, and supportive services. However, CoCs will be unable to capitalize on this opportunity without improved universal HMIS standards.

Currently, there exists a patchwork of inconsistencies among the capabilities and sophistication of HMIS applications. This translates directly into inefficiency, duplicative efforts, and premature resource exhaustion. The proposed HMIS amendments would align current disparities among HMIS applications, and such improved congruence of HMIS sophistication among CoCs nationwide would enhance the benefits of Centralized Intake and Coordinated Assessment.

Although HUD has made tremendous strides with the CoC Interim Rule, quality data is what truly lies at the forefront of the nation's battle to end homelessness. But data is only as strong as the HMIS that supports it. Therefore, HUD'S proposed HMIS amendments would establish HMIS standards of quality and capability that will lead enhanced data quality and reporting. In turn, this would result in better data, enhanced reporting, and overall reductions in homelessness within communities nationwide.

5. REFERENCES

[1] "Homeless Management Information Systems Requirements, Proposed Rule." Federal register 76 (9 December, 2011): 76917-76927. Print.

[2] "Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program; Interim Final Rule" Federal Register 77 (31 July, 2012): 45422-45467. Print.

[3] "Homeless Management Information Systems (HMIS); Data and Technical "Standards Final Notice; Notice" Federal Register 69 (30 July, 2004): 45888-45934. Print.

[4] National Coalition for the Homeless. (2006) Fact Sheet #18: McKinney-Vento Act. Retrieved October 8, 2013 from: <http://web.archive.org/web/20071203073025/http://www.nationalhomeless.org/publications/facts/McKinney.pdf>

[5] U.S. Department of Housing & Urban Development, Office of Community Planning and Development, Office of Special Needs Assistance Programs. (2001) Report to Congress: HUD's Strategy For Homeless Data Collection, Analysis and Reporting. Retrieved October 8, 2013 from: <http://archives.hud.gov/offices/cpd/homeless/hmis/strategy/congressreport.pdf>

[6] U.S. Department of Housing & Urban Development, Office of Community Planning and Development. (2004) Third progress report to congress on HUD's strategy for improving homeless data collection, reporting, and analysis. Retrieved October 8, 2013 from:

<http://archives.hud.gov/offices/cpd/homeless/hmis/strategy/reporttocongress2004.pdf>

[7] Chapter 5 of Title 24 of Code of Federal Regulations. Retrieved October 24, 2013 from: http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title24/24tab_02.tpl

[8] "Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidated Plan Conforming Amendments" Federal Register 76 (5 December, 2011): 75954 - 75994. Print.

[9] "The Notice of Allocation, Application Procedures, and Requirements for Homelessness Prevention and Rapid Re-Housing Program Recipients and subrecipients under the American Recovery and Reinvestment Act of 2009 (HPRP Notice)" Federal Register 76 (9 December, 2011): 76917-76927. Print.

[10] "Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program; Interim Final Rule" Federal Register 77 (31 July, 2012): 45422-45467. Print.

This publication contains general information only and is based on the experiences and research of Silver Spur Systems, LLC. Silver Spur Systems, LLC and its subsidiary Clarity Human Services, is not, by means of this publication, rendering business, financial, investment, or other professional advice or services. This publication is not a substitute for such professional advice or services, nor should it be used as a basis for any decision or action that may affect your business. Before making any decision or taking any action that may affect your business, you should consult a qualified professional advisor. Silver Spur Systems, LLC, its affiliates, and related entities shall not be responsible for any loss sustained by any person who relies on this publication.

6. HMIS PROPOSED DEFINITIONS

Continuum of Care

The group composed of representatives from organizations including 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 veterans, and homeless and formerly homeless persons organized to carry out the responsibilities of a Continuum of Care established under 24 CFR part 578

Comparable Database

A database that is not the Continuum's official HMIS, but an alternative system that victim service providers and legal services providers may use to collect client-level data over time and to generate unduplicated aggregate reports based on the data, and that complies with the requirements of this part. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

Contributing HMIS Organization (CHO)

An organization that operates a project that contributes data to an HMIS

Data Recipient

Means a person who obtains personally identifying information from an HMIS Lead or from a CHO for research or other purposes not directly related to the operation of the HMIS, Continuum of Care, HMIS Lead, or CHO

Homeless Management Information System (HMIS)

The information system designated by Continuums of Care to comply with the requirements of this part and used to record, analyze, and transmit client and activity data in regard to the provision of shelter, housing, and services to individuals and families who are homeless or at risk of homelessness

HMIS Lead

Entity designated by the Continuum of Care in accordance with this part to operate the Continuum's HMIS on its behalf

HMIS Vendor

Contractor who provides materials or services for the operation of an HMIS. An HMIS vendor includes an HMIS software provider, web server host, data warehouse provider, as well as a provider of other information technology or support.

HMIS Participating Bed

A bed on which required information is collected in an HMIS and is disclosed at least once annually to the HMIS Lead in accordance with the requirements of this part

HUD

Department of Housing and Urban Development

Lodging Project

A project that provides overnight accommodations

Non-Lodging Project

A project that does not provide overnight accommodations

Participation Fee

A fee the HMIS Lead charges CHOs for participating in the HMIS to cover the HMIS Lead's actual expenditures, without profit to the HMIS Lead, for software licenses, software annual support, training, data entry, data analysis, reporting, hardware, connectivity, and administering the HMIS.

Protected Identifying Information

Means information about a program participant that can be used to distinguish or trace a program participant's identity, either alone or when combined with other personal or identifying information, using methods reasonably likely to be used which is linkable to the program participant.

Unduplicated Count of Homeless

An enumeration of homeless persons where each person is counted only once during a defined period

User

An individual who uses or enters data in an HMIS or another administrative database from which data is periodically provided to an HMIS.

Victim Service Provider

A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs



CLARITY
HUMAN SERVICES

Silver Spur Systems LLC
9101 W. Sahara Ave. #105-158
Las Vegas, NV
89117

(702) 605.6870
(888) 866.1533

www.clarityhs.com