
Orange County Continuum of Care Policies, Procedures and Standards Committee

Webinar: <https://ocgov.webex.com/ocgov/j.php?MTID=mdbf3e00399910095774b57d30f73ff4b>
Dial by Phone: +1-213-306-3065
Access Code: 177 379 4134
Password: ochca
Date: May 11, 2021
Time: 3:30-5:00 P.M.

Committee Chair: Maricela Rios-Faust

Committee Members: Patti Long, Judson Brown, Christina Weckerly-Ramirez, Matt Bates

Agenda:

I. Welcome and Introductions – Chair Maricela Rios-Faust

II. Public Comments – Chair Maricela Rios-Faust

Members of the public may address the Policies, Procedures and Standards (PPS) Committee on items listed within this agenda or matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the PPS Committee. Members of the public may address the PPS Committee with public comments on agenda items after the PPS Committee member discussion. Comments will be limited to three minutes. If there are more than five public speakers, this time will be reduced to two minutes. In order to address the PPS Committee, members of the public are to enter their name and agenda item number in the Webex chat box to be placed in a queue. PPS Committee staff will call your name in the order listed in the chat box.

III. PPS Committee Updates – Zulima Lundy, Continuum of Care (CoC) Manager

- a. Update on the CoC Vision Ad Hoc
- b. Update on Lived Experience Advisory Committee

IV. CoC Board Election Process for Expiring Seats – Zulima Lundy, CoC Manager

- a. Discussion on the past CoC Board election process
- b. Discussion on the upcoming CoC Board election process

- V. HMIS Access and Participation Requirement Policy – Zulima Lundy, CoC Manager and the Ad Hoc on Proposed HMIS Policy Members
 - a. Approve the HMIS Access and Participation Requirement Policy as recommended by the Ad Hoc on Proposed HMIS Policy



HMIS ACCESS AND PARTICIPATION POLICY

Policies, Procedures and Standards Committee
Meeting Agenda Item V

May 11, 2021

HMIS Access and Participation Requirement Policy

The HMIS Access and Participation Requirement Policy (Policy) establishes the minimum criteria that organizations must meet to be granted HMIS access. For organizations that meet the minimum criteria to be granted HMIS, the Policy further outlines the data entry and related activities that must be completed by the agency maintain HMIS access.

HMIS Access

In order to be granted HMIS Access, an organization must be able to meaningfully contribute information related to homeless assistance projects and/or homelessness prevention projects to the Orange County Continuum of Care.

An organization that at minimum meets one of the following criteria will be granted access to HMIS:

- Manage a homeless assistance project and has the project included in HMIS to support an increase in bed coverage for the Continuum of Care. The following homeless assistance project types will increase bed coverage: emergency shelter, transitional housing, rapid rehousing, permanent supportive housing, and/or other permanent housing.
- Receive federal and/or state funding for the implementation and operations of a homeless assistance project and/or homelessness prevention project that requires HMIS participation. Attachment A details federal and state funding sources that requires HMIS participation.
 - Organizations receiving funding that requires HMIS participation will be given data entry access, but this does not necessarily include data sharing with other agencies. Law enforcement agencies and legal service providers receiving funding that requires HMIS participation will be given data entry access only.
 - Victim service providers and legal service providers that are recipients of funds requiring participation in HMIS, but do not directly enter data into an HMIS, must use a comparable database. A comparable database allows the collection of the aggregate data needed for reporting while respecting the sensitive nature of the client-level information if it complies with all HMIS data, technical, and security standards.

Organizations that do not meet the above listed criteria, will be required to submit an HMIS Access Application for review and consideration by the HMIS Access Ad Hoc to further evaluate the request. The HMIS Access Ad Hoc will be comprised of two to three appointed by the Continuum of Care Board membership, the CoC Collaborative Applicant and the HMIS Lead. The HMIS Access Ad Hoc will meet on an as needed basis for the purposes of evaluating HMIS Access Applications.

The HMIS Access Application requires organizations to detail how their organization's participation in HMIS will be able to meaningfully contribute information related to homeless assistance projects or homelessness prevention projects to the Orange County Continuum of Care and how the HMIS access will improve the provision of homeless services in the Orange County Continuum of Care. The HMIS Access Application will also assist the HMIS Access Ad Hoc evaluate the organization's HMIS Data Sharing capabilities.

The HMIS Access Application will request the following information from the organization:

- Organization's Name
- Type of Organization: Non-profit, for-profit, or government organization
- Mission of the organization
- Years of experience
- Description of the role of the organization within the Homeless Service System
- Description of the role of the target population served
- Description of services or assistance offered
- Does the organization participate in HMIS in another Continuum of Care? If so, which one(s)?
- Description of services or project types to be set up within HMIS
- Does the organization have a contractual obligation to enter data into HMIS?
- How will HMIS access improve the provision of services to clients?
- Will your organization be able to meaningfully contribute information related to homeless assistance projects or homelessness prevention projects to the Orange County Continuum of Care? If so, how?
- Will your organization be able to meet the HMIS Participation Requirements?
- Provide details on the type of staff that will have HMIS access and the role of the staff plays in the delivery of homeless assistance projects or homeless prevention projects.
- Will the persons participating in HMIS be volunteers or paid staff?

Organizations that meet the requirements for HMIS Access must be in compliance all other aspects of the HMIS Policies and Procedures, including the HMIS Participating Agency Agreement and the Data Sharing Agreement.

The HMIS Access Ad Hoc and the HMIS Lead reserve the right to remove HMIS Access if the access is not being used to improve service provision for clients or contributing meaningful data to the Orange County Continuum of Care. Examples of unacceptable uses of HMIS include but are not limited to:

- Using HMIS data to monitor the whereabouts or service utilization of participants for purposes outside of housing-focused case management
- Using HMIS data as an information gathering tool
- Using data in HMIS as a reason to not serve a client (ie. substance abuse history, mental health issues, etc.)
- Sharing client identifying data with persons or groups not permitted to access HMIS

HMIS Participation Requirements

An organization that is granted HMIS access is required to be a Contributing HMIS Organization.

As part of the data entry requirements, organizations are expected to utilize HMIS for the following activities related to the homeless assistance project and/or homelessness prevention project:

- Have a minimum of one active enrollment at all times
- For participants that are enrolled in HMIS, completion of client intake, case management and service tracking, assessments, uploading related documents and/or client exit are to be recorded in HMIS

- Update at least one HMIS record per month. Updates can be related to enrollment, service, update/annual assessment, file, and/or exit.
- Have a minimum of one active HMIS User at all times.
- Complete any reporting, data quality, data entry, or other requirements outlined by the U.S. Department of Housing and Urban Development (HUD), the Coordinated Entry System (CES) Lead, or the HMIS Lead.

Organizations found to not meet one or more of the guidelines above may be contacted by the HMIS Lead Agency to discuss the appropriateness of the agency's continued participation in the OC HMIS, the HMIS Lead may inform the HMIS Access Ad Hoc to determine the appropriateness of the agency's continued participation in the OC HMIS, and the organization may have HMIS Access revoked.

Definitions

For the purpose of this Policy, the following terms are defined as follows:

- **Homeless Management Information System (HMIS)** is the information system designated by the Orange County Continuum of Care to comply with the HMIS requirements prescribed by HUD. The local HMIS platform is Bitfocus Clarity.
- **HMIS Lead** is the entity designated by the Orange County Continuum of Care to manage and operate the HMIS on its behalf. The local HMIS Lead is 2-1-1 Orange County.
- **Organization** refers to a non-profit organization, for-profit organization and/or government organization whose primary focus is the delivery of homeless services in the Continuum of Care.
- **Contributing HMIS Organization** refers to organizations that have access to HMIS and enters information related to homeless assistance projects or homelessness prevention projects into HMIS. This is the term used by the HUD in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. Locally, the term "Participating Agency" is also utilized.
- **HMIS Access Ad Hoc** will be comprised of two to three members appointed by the Continuum of Care Board, the CoC Collaborative Applicant and HMIS Lead.

Attachment A

The following is a list of the identified Federal and State funding sources that require such participation. Please note that this list may not be all exhaustive and may change over time.

- U.S. Department of Housing and Urban Development (HUD):
 - Continuum of Care (CoC) Program
 - Emergency Solutions Grants (ESG)
 - Housing Opportunities for Persons with AIDS (HOPWA)
- U.S. Department of Health and Human Services (HHS):
 - Projects for Assistance in Transition from Homelessness (PATH) funded by the Substance Abuse and Mental Health Services Administration (SAMHSA)
 - Runaway and Homeless Youth (RHY) projects funded by the Administration for Children and Families' Family and Youth Services Bureau (FYSB)
- U.S. Department of Veterans Affairs (VA):
 - Domiciliary Care for Homeless Veterans (DCHV)
 - Grant and Per Diem (GPD)
 - HUD-Veterans Affairs Supportive Housing (VASH)
 - Supportive Services for Veteran Families (SSVF)
 - Veterans Homelessness Prevention Demonstration (VHPD)
- State Funding Sources
 - California Emergency Solutions and Housing (CESH)
 - CalWORKs Housing Support Program (HSP)
 - Community Development Block Grant (CDBG)
 - Homeless Emergency Aid Program (HEAP)
 - Homeless Housing, Assistance and Prevention (HHAP)
 - Housing and Disability Advocacy Program (HDAP)
 - Permanent Local Housing Allocation (PLHA)
 - State Emergency Solutions Grant (ESG)