

MID-WILLAMETTE VALLEY HOMELESS ALLIANCE

HMIS Users Workgroup Agenda

Tuesday 04/08/2025

2:30 – 3:30

Location: Hybrid, Mid-Willamette Valley Council of Governments-100 High St SE, Salem

Zoom Link:

<https://wesd.zoom.us/j/99816020094?pwd=SM7pFFrxbGAlLaeB3laWTDGSDKNVu1.1>

Meeting ID: 998 1602 0094

Passcode: 057658

TIME	AGENDA ITEM	FACILITATOR
2:30	Welcome/Greeting • Agenda • Meeting minutes approval for 6/10/2025 ACTION: Vote to approve agenda and meeting minutes	David
2:35	Announcements • New HMIS User Training with OHCS • Future meeting schedule	Misty
2:40	Data Quality Preparing for reporting season – OHCS requests DISCUSSION: Issues identified by MWVHA & HMIS Users	All
2:55	2025 HMIS Data Standards Review and discuss new federal requirements	David
3:05	HMIS Users Workgroup Roster Identify primary & secondary agency administrators	Cassie
3:10	HMIS Policies and Procedures Review ACTION: Review & vote on approval of HMIS Policies & Procedures and Privacy & Security Plan	Cassie & David
3:25	Action Items/Next Steps/Dismiss	David

The Mid-Willamette Valley Homeless Alliance (MWVHA) is pleased to comply with the Americans with Disabilities Act (ADA). If you need special accommodations to attend this meeting, please contact MWVHA at (503) 540-1627, TTY 7-7-1 at least 48 hours prior to the meeting. We accept all relay calls.

Meeting Minutes of:

**MID-WILLAMETTE VALLEY HOMELESS ALLIANCE (MWVHA)
HMIS USERS WORKGROUP**

Meeting Location(s):

May 13, 2025

2:30 – 3:30

Mid-Willamette Valley Council of Government
100 High St SE, Salem, OR 97301

And

Via teleconference (Zoom)

MEMBERS PRESENT

Center for Hope and Safety, Tara Stephen

Center for Hope and Safety, Brandi Rada

Church at the Park, Katherine Sommer

Mid-Willamette Valley Community Action Agency, Arches, Rachel McKee

Mid-Willamette Valley Community Action Agency, Arches, Jared Valet

Northwest Human Services, Pamela Blanchard

Polk County Family and Community Outreach, Nicole Walker Sundby

Salem Housing Authority, Bianca Mendoza

Sheltering Silverton, Megan Smith – Alt. Sean Farris

St Francis Family Housing, Jill Tucker

United Way, SafeSleep, Lynelle Wilcox

UGM, Simonka Place, Brenda Newey

Youth Era, Faye Sanders

MEMBERS ABSENT

Church at the Park, Helen Jones

Church at the Park, Lynn Marquez

Easterseals, Wyat Sloan

Family Promise, Doug Odell

Marion County Housing Authority, Christine Sommer

Shangri-La, Erika Bush

Women at the Well, Grace House, Kimberly Nowlin

GUESTS & MWVHA STAFF PRESENT

Center for Hope and Safety, Brandi Rada

Curandi, Chris Barber

MWWVHA, Ashleigh Duda

MWVHA, Misty Bolger
MWVHA, Cassie Bay
MWVHA, David Peak
MWVHA, Consultant, Joy Dickinson

WELCOME

The meeting began at 02:30 p.m. The presence of a quorum was noted.

AGENDA

Misty announced agenda items and requested a motion to approve April's meeting minutes.

MOTION TO APPROVE THE APRIL MWVHA HMIS USERS WORKGROUP MEETING MINUTES BY: RACHEL

Seconded by: Nicole
In favor: Unanimous
Opposed: None
Abstentions: None

STRATEGIC PLAN

Joy from Dickinson Consultants presented an overview of the strategic plan for the Mid-Willamette Valley Homeless Alliance. She highlighted the following key points:

- The strategic plan was developed over the past year with input from 130 stakeholders.
- The plan includes 4 main goals: understanding the community, developing and improving the coordinated system of care and services, maximizing resources, and increasing participation in the alliance.
- For the HMIS workgroup specifically, objectives include improving data quality and accuracy, implementing the data quality improvement plan, and examining trends to inform decision-makers.
- A dashboard was created to track metrics for each goal, including HMIS-related measures like report submission timeliness and data completeness.

Joy invited questions from the group. Misty noted that the HMIS workgroup can have a significant impact on data quality and shared language for reporting. She mentioned that the alliance's lowest score from HUD was on system performance data, indicating room for improvement.

PIT/HIC UPDATES

David provided updates on the Point-in-Time (PIT) count and Housing Inventory Count (HIC):

- Submissions are now open for PIT/HIC data.

- The first draft of PIT information was submitted with only 48 flags, most of which were related to non-HMIS participating providers.
- HIC numbers still need board approval before final submission.
- Overall, data quality has improved significantly compared to previous years.

David also addressed a question about user licenses:

- OHCS is working on deleting unused licenses to optimize usage.
- Agencies should inform the alliance about staff departures or extended leaves to manage licenses effectively.

OPEN FORUM/Q&A/NEXT STEPS

Misty opened the floor for discussion on how to improve the committee's effectiveness. Key points included:

- A survey will be sent out to gather feedback on meeting structure, needs, and opportunities for growth.
- The group discussed the need for clarification on roles and responsibilities between agencies and the CoC.
- Lanell raised concerns about repetitive data collection and suggested exploring ways to share information more effectively while maintaining trauma-informed care principles.
- Nicole expressed uncertainty about her role in the workgroup and suggested exploring different ways for programs to be involved.
- David highlighted the importance of tailoring assessments to specific programs and noted that the alliance is still working on defining roles and best practices.

Next steps:

1. Misty will create and distribute a survey to gather feedback on engagement, data quality, and barriers to data entry.
2. The next meeting will discuss survey results and the possibility of a joint meeting with the Coordinated Entry group.
3. The alliance will work on developing more efficient training methods, including online and standardized options.

ZOOM CHAT MESSAGES

14:32:18 From jared.valet : Jared Valet, MWVCAA

14:32:21 From Rachel McKee (she/her) MWVCAA : Rachel McKee – MWVCAA

14:32:23 From Jill Tucker – St. Francis Family Housing : Jill Tucker – St. Francis Family Housing

14:32:23 From Faye Sanders (she/her) : Faye Sanders, Youth Era

14:32:28 From Brenda : Brenda Newey UGM Simonka Place

14:32:30 From Sean Farris, Sheltering Silverton : Sean Farris, Sheltering Silverton

14:32:36 From Pblanchard : Pamela Blanchard NWHS

14:32:37 From Bianca : Bianca Mendoza SHA

14:32:43 From ChrisBarber : Chris Barber, Curandi

14:32:48 From Joy Dickinson : Joy Dickinson, Dickinson Consultants

14:33:14 From lynelle : Lynelle Wilcox, SafeSleep United

14:34:10 From Homeless Alliance : https://mwvhomelessalliance.org/wp-content/uploads/2025/04/2025.04.08_HMIS_User_Workgroup_Agenda_Pkt.docx.pdf

14:39:00 From Homeless Alliance : Strategic Plan – Mid-Willamette Valley Homeless Alliance

14:56:59 From Homeless Alliance : Good job, Data Team!

14:57:10 From Ashleigh Duda – MWVHA : Reacted to "Good job, Data Team!" with ❤️

14:57:51 From Rachel McKee (she/her) MWVCAA : Can we get an update on user licenses?

14:58:35 From David Peak : Reacted to "Can we get an update..." with 👍

15:02:29 From Jill Tucker – St. Francis Family Housing : So, I'm not really sure what to say to that – I think a survey is good but more clarity around what you want from us aside from clean data would be great.

15:04:18 From Rachel McKee (she/her) MWVCAA : It might be helpful in a future meeting to go more in depth on who's role is what (agency vs coc)

15:04:29 From Jill Tucker – St. Francis Family Housing : Structure!!! The best thing you can give us is structure and for you to tell us what you want and how you want it. We will adapt to what you want, but we need to know what you want

15:04:42 From Ashleigh Duda – MWVHA : Reacted to "Structure!!! The be..." with ❤️

15:04:44 From Kathryn Sommer : Reacted to "It might be helpful ..." with 100

15:04:48 From Rachel McKee (she/her) MWVCAA : Reacted to "Structure!!! The be..." with ❤️

15:04:50 From Nicole Walker Sundby : Reacted to "It might be helpful ..." with 👍

15:04:56 From Ashleigh Duda – MWVHA : Reacted to "It might be helpful ..." with ❤️

15:07:05 From Jill Tucker – St. Francis Family Housing : Sorry – aren't there already best practices for this? Do we need to reinvent the wheel or can we look at what's working, adapt it and get down to the work. Not to be a pain but I have been on this workgroup a long time and it would be great to agree on a standard and just actually get to work on implementing it

15:12:49 From lynelle : I get that some questions are repetitive by requirement, yet are there ways to be more collaborative with case mgmt and notes about what has been done/next steps to do as people may be at different hms-using service providers, as a way to increase collaboration and decrease repetition and trauma?

15:13:39 From Nicole Walker Sundby : Love to hear this! And have appreciated this group :)

15:14:10 From Ashleigh Duda – MWVHA : Reacted to "Love to hear this! A..." with ❤️

15:14:57 From ChrisBarber : Multiple entry of the same client due to HMIS requirements and its outcomes should be a data point to track. The feedback to HUD would be meaningful and it informs us of our system flow.

15:16:22 From lynelle : We can see some basics, but to coordinate case mgmt, it would be useful to see case notes and not reinvent the wheel.

15:16:56 From Rachel McKee (she/her) MWVCAA : We would need client consent to share case notes between agencies

15:17:25 From lynelle : we usually already have rois.

15:18:03 From lynelle : can HMIS itself allow an option for that level of sharing?

15:18:11 From Brenda : Here at Simonka Place we will not share our case notes.

15:18:20 From Tara Stephen, Center for Hope & Safety : That sounds more like collaborative case conferencing to me

15:18:35 From Rachel McKee (she/her) MWVCAA : Reacted to "That sounds more lik..." with 👍

15:18:36 From Jill Tucker - St. Francis Family Housing : Yeah, unless we are case conferencing - it is hard to get consent to share notes

15:18:49 From jared.valet : Reacted to "Yeah, unless we are ..." with 👍

15:19:38 From ChrisBarber : Many other areas have this covered with entry ROIs , CE and case coordination plug ins.

15:20:18 From Jill Tucker - St. Francis Family Housing : Are there any updates on training new agencies to do CE? We'd love to be able to assess people rather than sending it out

15:21:22 From Jill Tucker - St. Francis Family Housing : Thanks!

Misty adjourned the meeting, thanking everyone for their participation and encouraging attendance at the next meeting.

Meeting Notes (No Quorum) of:

MID-WILLAMETTE VALLEY HOMELESS ALLIANCE (M WVHA)
HMIS USERS WORKGROUP

Meeting Location(s):

June 10, 2025

2:30 – 3:30

Mid-Willamette Valley Council of Government

100 High St SE, Salem, OR 97301

And

Via teleconference (Zoom)

MEMBERS PRESENT

Center for Hope and Safety, Tara Stephen

Mid-Willamette Valley Community Action Agency, Arches, Rachel McKee

Mid-Willamette Valley Community Action Agency, Arches, Jared Valet

Polk County Family and Community Outreach, Nicole Walker Sundby

SafeSleep, Lynelle Wilcox

Sheltering Silverton, Megan Smith

St Francis Family Housing, Jill Tucker

United Way, SafeSleep, Lynelle Wilcox

UGM, Simonka Place, Brenda Newey

Youth Era, Faye Sanders

MEMBERS ABSENT

Church at the Park, Helen Jones

Church at the Park, Katherine Sommer

Easterseals, Wyatt Sloan

Family Promise, Doug Odell

Marion County Housing Authority, Christine Sommer

Mid-Willamette Valley Community Action Agency, Mercedes Thorington

North West Human Services, Pamela Blanchard

Salem Housing Authority, Bianca Mendoza

Shangri-La, Erika Bush

Women at the Well, Grace House, Kimberly Nowlin

MWVHA STAFF & GUESTS PRESENT

ICA, Abby Burgess

MWVHA, Cassie Bay

MWVHA, David Peak

MWVHA, Misty Bolger
MWVHA, Nathaniel Perez
Sheltering Silverton, Sean Farris

WELCOME

Quorum was not met, so the meeting did not convene officially. The workgroup proceeded with informational items only and deferred approval of the May 2025 minutes.

STAFF UPDATE AND NEXT STEPS

Staffing changes: Due to budget constraints, two Alliance positions are being laid off effective June 30. The Alliance expressed appreciation for Ashley and Nathaniel's contributions and outlined a plan to maintain provider support.

July pause: HMIS Users Workgroup meetings will pause in July to allow internal transitions and planning. A short "summer availability" check will determine if an August session should also be paused.

Help Desk process: The Alliance will move to a ticketing system to triage requests, track response times, and improve transparency. Tickets will be prioritized by issue type and routed to staff.

Training and resources: Short FAQ and training videos are being produced and will be posted to YouTube and linked from the Alliance website. New trainings will be limited in July and handled case by case.

Reports: The Alliance will pause non-essential custom reports temporarily. Coordination with OHCS will continue to meet required reporting.

Questions and concerns were heard regarding continuity of support. Misty affirmed the plan to monitor capacity and communicate timelines.

UPDATED ES ASSESSMENT / DATA QUALITY REPORT

Abby presented a draft Emergency Shelter entry assessment mock-up built in the training site to streamline data entry, align required fields, and remove retired or non-applicable items.

Key points:

- Required fields: Any data element required for each household member will be set as required on the entry screen. Required fields will be visually marked for clarity.
- Wayfinding labels: New inline labels will direct users from yes/no items like Disabling Condition and Health Insurance to their related sub-assessments to keep data consistent.
- Upcoming HUD change: HUD's FY 2026 Data Standards (effective 10/1/2025 for publication; field changes targeted 10/1/2026 per discussion) will retire Gender Identity in favor of Sex. The CoC will need to decide whether to continue collecting identity information locally when standards change.
- Funding-specific fields: Items such as Last Grade Completed, Percent of AMI, and Level of Family Income appear to be funder-specific rather than HUD-required for ES. Discussion favored:
 - Keeping Last Grade Completed where needed for CSBG/CAA reporting (generally age 14+), possibly through a CAA-specific variant of the assessment rather than imposing on all providers.

- Moving AMI and Federal Poverty Level to Head of Household only when required, and limiting visibility to funders that need them.
- Children vs adults: Given current software limits, the team cannot fully hide adult-only questions on child records. Reorganization groups All Clients vs HOH and All Adults to help users skip items not applicable to children.
- Removed content: Retired HMIS fields will be removed. Housing Move-In Date is not on ES entry and will remain off.
- Visibility group update: A new public visibility group is planned so Agency Administrators can correct client sharing for records that were not visible CoC-wide. Training will follow after assessment updates.

Discussion items:

- Household size: Mixed views on keeping a keyed field vs relying on calculated enrollment counts. Some users find a manual field helpful for agency reporting.
- Multiple assessments approach: The group may revisit having child-specific or program-specific assessments later, noting retraining needs.
- Vendor improvements: Members suggested advocating for conditional logic and other usability features in future vendor conversations.

Next steps: Continue testing the ES assessment in the training site, gather input from providers that were absent, and finalize per project type (ES, SO, RRH, PSH) before deployment.

USER ACCOUNT INACTIVITY POLICY (FYI)

Nate explained the policy position from OHCS on inactive HMIS user accounts.

Inactivity: Accounts inactive 30 days without a successful login will be marked inactive by OHCS.

Deletion: Accounts without login for 60 days will be deleted by OHCS.

Reactivation path:

- First reactivation: End user emails HMIS Lead; new User Agreement required.
- Second deletion/reactivation: Requires coordination with the user's manager and another agreement.
- Third deletion: Permanent removal of access.

Planned absences: The CoC can temporarily inactivate users for leave or vacation and schedule reactivation to prevent OHCS inactivity actions.

Exceptions: The CoC will advocate with OHCS where justified by role or unique duties. Agencies should review license assignments to match actual usage.

ZOOM CHAT MESSAGES

00:08:51 megansmith: I can here her
 00:08:54 megansmith: hear
 00:09:02 Sean Farris, Sheltering Silverton: i can hear her
 00:13:31 NathanielPerez: Feel Free to put comments in the Chat!
 00:17:50 megansmith: Why do we have to collected this information on education for an emergency shelter program? Is this HUD mandated?

00:24:36 Jill Tucker - St. Francis Family Housing: So we collect AMI anyway but the HHS is not something that we have ever collected or have any use for

00:32:09 DavidPeak: But Nicole, you won't be asked for Housing Move in date!!

00:34:41 Nicole Walker Sundby: I'M SO EXCITED!

00:34:46 Nicole Walker Sundby: Reacted to "But Nicole, you won'..." with 🤔

00:35:39 DavidPeak: We are too! Data quality can only get better when we're only asking for what is required to report on.

00:39:34 Abby Burgess,ICA: Thank you, Misty!

00:42:55 Jill Tucker - St. Francis Family Housing: So is Ashleigh Duda going as well? What does that mean for CE and assessments

00:43:01 Jill Tucker - St. Francis Family Housing: I thought I heard that

00:45:48 DavidPeak: Jill, We will still be doing pulls for programs if requested, the main thing that people might notice is trainings will look different and may take longer to access.

00:46:50 Jill Tucker - St. Francis Family Housing: Replying to "Jill, We will still ..."

00:50:15 Hey David - I kinda got that impression. Thanks for the follow up though
Nicole Walker Sundby: Quick question: Is there any exceptions possible for people in positions who help with clean up and reporting, but aren't necessarily logging in regularly?

00:51:55 Jill Tucker - St. Francis Family Housing: Replying to "Quick question: Is t..."

00:54:07 Tagging onto that - what if we have folks who go on leave or otherwise are stepping out but will be back?

00:55:10 Jill Tucker - St. Francis Family Housing: Yes, it does
Homeless Alliance: I need to jump off but if anyone has questions regarding the staffing transition please email me:
misty.bolger@MWVHomelessalliance.org



**Mid-Willamette Valley
Homeless Alliance**

HMIS LEAD

POLICIES & PROCEDURES

CONTENTS

1. Introduction and Purpose	5
2. Authority and Regulatory Framework	5
3. Key Terms	5
4. HMIS Governance	6
HMIS Roles and Designation	6
Agency Administrator Responsibilities	6
CoC Board of Directors, ors 190 entity Responsibilities	7
HMIS Lead Responsibilities	7
HMIS Users Workgroup Responsibilities	8
System Administrator Responsibilities	9
5. Participation Requirements	9
HMIS Participation	9
Enforcement	10
6. Victim Service Provider (VSP) Comparable Database Requirements	10
Compliance with HUD Standards	10
Privacy and Security	10
Data Quality and Reporting	11
Participation Agreement	11
Enforcement	11
7. Privacy and Security plan	11
Privacy and Security Plan	11
Participating Agency and HMIS Lead Responsibilities	12
Privacy Notice Requirements	12
Client Consent and Release of Information	12
Client Rights	12
Security Requirements	12
Confidentiality Standards	13
Security Breach Protocol	13
Monitoring and Enforcement	13
8. Data Collection and Quality	13
Required Data Elements	14
Timeliness Standards	14

Completeness Standards.....	14
Accuracy Standards.....	14
Data Quality Monitoring.....	14
Corrective Action	14
9. System Administration and Operations	14
User Account Management.....	14
Access and Authentication	15
System Operations and Maintenance.....	15
Data Security Safeguards.....	15
Technical Support.....	15
Monitoring and Compliance	15
10. Monitoring and Compliance.....	15
Monitoring Activities.....	16
Error Thresholds.....	16
Reporting and Feedback.....	16
Corrective Action	17
Enforcement.....	17
Note on Voluntary Participation.....	17
Due Process	17
CoC Board Oversight.....	17
Documentation and Recordkeeping.....	17
11. Reporting and Use of Data	18
Required Federal Reports	18
Local Data Use.....	18
Agency Reporting Requirements	18
Data Sharing and Publication.....	19
Enforcement.....	19
12. Change Management	19
HUD Data Standards Updates	19
Policy and Procedure Revisions	20
System Configuration	20
Communication of Changes	20
Implementation Timeline.....	20

Continuous Improvement.....	20
13. Training and Technical Assistance.....	21
User Training Requirements.....	21
Technical Assistance (TA) Offerings.....	21
Enforcement.....	21
14. Appendices	21
Appendix A:.....	22
Glossary of Technical Terms.....	22
Core HMIS and CoC Terms.....	22
Compliance and Technical Terms.....	23
HUD Reports and Analysis.....	23

1. INTRODUCTION AND PURPOSE

The ORS 190 Entity, Mid-Willamette Valley Homeless Alliance (MWVHA), is recognized by the U.S. Department of Housing and Urban Development (HUD) as Continuum of Care OR-504 (Marion and Polk Counties). MWVHA, operating as an ORS 190 Intergovernmental Entity, serves as the Continuum of Care (CoC), Collaborative Applicant, and HMIS Lead Agency/Administrator for the Marion and Polk County region. Hereinafter referred to as “the Alliance”.

The purpose of this document is to promote transparency, provide clear guidance, and ensure compliance with HUD requirements under 24 CFR Part 578 and the HUD HMIS Data Standards. It serves as a single, comprehensive reference for the Alliance, consolidating multiple policies into one document that supports consistent HMIS governance, privacy, and operational practices.

This document establishes the authority and regulatory framework for HMIS operations, describing the governance structure and annual review/approval process. It defines participation and comparable database requirements, outlines privacy and security standards (including required signage), and specifies expectations for data elements, timeliness, and completeness. Additionally, it details system administration and operations such as vendor management, user account processes, and helpdesk support; sets forth monitoring, corrective action, and access revocation procedures; identifies required federal reports and local data use policies; explains how HUD data standards updates are implemented and communicated; and describes user training requirements, agency administrator roles, and technical assistance offerings.

2. AUTHORITY AND REGULATORY FRAMEWORK

- [Responsibilities of the Continuum of Care](#): 24 CFR 578.7
- [2024 HMIS Data Standards Manual](#) (2026 coming 10/1)
- [2024 HMIS Data Dictionary](#) (2026 coming 10/1)
- [2004 HMIS Data and Technical Standards](#)
- [McKinney-Vento Act: 42 USC Chapter 119, Subchapter VI, Part B](#)
- [Hearth Act](#) (2009 amendment to McKinney-Vento Act)
- [MWVHA Governance Charter](#)
- [ORS 190 Entity-MWVHA Bylaws](#)
- [HMIS Users Workgroup Governance Charter](#)

3. KEY TERMS

Agency Administrator: A staff member designated by each Participating Agency to serve as the primary liaison with the HMIS Lead. Responsibilities include managing user accounts, ensuring training compliance, and monitoring internal data quality and security to maintain a secure environment.

Comparable Database: A database maintained by a VSP that collects all HUD-required Universal Data Elements (UDEs) and Program-Specific Data Elements (PDEs), generates required HUD reports, and complies with HUD privacy/security standards and VAWA confidentiality provisions.

Continuum of Care (CoC): The community-based planning body designated by HUD to organize and deliver housing and services to meet the needs of people experiencing homelessness. The CoC is responsible for coordinating funding, planning, and system-wide performance to prevent and end homelessness within its geographic area.

HMIS Administrator: Individual(s) designated by the HMIS Lead to manage day-to-day HMIS operations. The HMIS Administrator is responsible for setting up user accounts, controlling access, configuring the system, monitoring data quality, troubleshooting issues, and providing technical support to participating agencies and end-users.

HMIS Lead: An organization designated by the Continuum of Care (CoC) to operate and manage the Homeless Management Information System (HMIS) in compliance with HUD standards. The HMIS Lead is responsible for system administration, security, data quality oversight, user account management, and coordination of training and support for participating agencies.

HMIS Users Workgroup: A CoC workgroup comprised of agency representatives and HMIS users, tasked with supporting data quality, reviewing policies, identifying barriers, and making recommendations to the HMIS Lead and CoC Board.

Participating Agency (Contributing HMIS Organization / CHO): Any organization or project required to enter data into HMIS as a condition of CoC, ESG, or state funding. This includes all CoC- and ESG-funded recipients/subrecipients, as well as other agencies that voluntarily participate.

Victim Service Provider (VSP): An agency designated under the Violence Against Women Act (VAWA) that is prohibited from entering client-level data into HMIS. VSPs instead use a comparable database that meets HUD standards and submit de-identified aggregate data.

4. HMIS GOVERNANCE

HMIS ROLES AND DESIGNATION

HMIS Lead Agency/Administrator/Continuum of Care:
The Alliance

System Administrator:
Oregon Housing and Community Services (OHCS)

Software Vendor:
WellSky

AGENCY ADMINISTRATOR RESPONSIBILITIES

- Each Participating Agency must designate an HMIS Agency Administrator who serves as the primary point of contact with the HMIS Lead and serves on the HMIS Users Workgroup.
- Responsibilities include:
 - Ensuring agency staff complete required training before HMIS access is granted.
 - Monitoring compliance with HMIS policies, including privacy, security, and data quality requirements.
 - Serving as the first line of technical support within the agency before escalating issues to the HMIS Lead.
- Establish and follow internal agency protocols to escalate technical issues to the designated Agency Administrator before contacting the HMIS Lead.

Refer to [Section 9: System Administration and Operations](#) for the required account, access, and security standards that Agency Administrators must implement.

COC BOARD OF DIRECTORS, ORS 190 ENTITY RESPONSIBILITIES

The CoC Board oversees the work of the HMIS partners and retains final decision-making authority on key HMIS issues. It consults with the HMIS Users Workgroup on policy and operational decisions. The Board also designates representatives to serve on the Oregon Multi-CoC HMIS Governance Committee, ensuring regional alignment with state-level HMIS decisions.

In accordance with HUD requirements, the CoC Board must:

- Designate an HMIS Lead to operate and administer the HMIS.
- Develop and adopt an HMIS governance charter that, at a minimum, includes:
 - A requirement that the HMIS Lead enter into written HMIS Participation Agreements with each participating agency.
 - Any additional requirements issued by HUD or the CoC from time to time.
- Maintain documentation demonstrating compliance with HUD regulations and with the adopted governance charter.
- Review, revise, and approve policies and plans required by federal regulation, as well as any notices or requirements issued by HUD from time to time.

HMIS LEAD RESPONSIBILITIES

The Alliance serves as the HMIS Lead. It is responsible for the overall administration and operation of the HMIS in compliance with HUD regulations and CoC policies. Specific responsibilities include:

SYSTEM ADMINISTRATION AND OPERATIONS

- Provide operation, security, maintenance, system auditing, and technical support for HMIS hardware, software, and connectivity.
- Establish and manage user accounts, access levels, and passwords.
- Coordinate software updates, product upgrades, and technical troubleshooting.

POLICIES, PLANS, AND COMPLIANCE

- Develop, maintain, and annually update the HMIS Privacy Plan, Security Plan, and Data Quality Plan.
- Submit all HMIS plans and significant policy changes to the CoC Board for review and approval.
- Assess compliance with the CoC's HMIS Policies and Procedures Manual and enforce corrective actions when violations occur.
- Incorporate HUD Data Standards updates and communicate changes to participating agencies within required timelines.

Refer to [Section 10: Monitoring and Compliance](#) for more details on the requirements related to monitoring and compliance.

Refer to [Section 12: Change Management](#) for processes to implement HUD Data Standards updates and policy revisions.

PARTICIPATION AGREEMENTS

- Maintain written HMIS Participation Agreements with all Contributing HMIS Organizations (CHOs).
- Maintain Comparable Database Participation Agreements with Victim Service Providers (VSPs).
- Include sanctions for violations of agreements and enforce compliance, up to and including corrective action or funding impacts.

Refer to [Section 10: Monitoring and Compliance](#) for more details on the requirements related to monitoring and compliance.

TRAINING AND TECHNICAL ASSISTANCE

- Provide initial and ongoing training to HMIS users on system use, privacy, and security requirements.
- Coordinate and facilitate regular HMIS Users Workgroup.

Refer to [Section 13: Training and Technical Assistance](#) for more details on training requirements and enforcement.

DATA QUALITY AND MONITORING

- Conduct regular data quality checks, including monitoring timeliness, completeness, and accuracy of data entered by participating agencies.
- Provide technical assistance and guidance to agencies to correct identified data quality issues.
- Ensure consistent HMIS participation by all CoC and ESG recipients and subrecipients, in accordance with 24 CFR 578.7(b).

REPORTING AND DATA USE

- Generate and submit HUD-required reports, including but not limited to the Longitudinal Systems Analysis (LSA), Housing Inventory Count (HIC), and Point-in-Time (PIT) Count reports.
- Provide regular aggregate data reports to the CoC Board, and participating agencies to support planning, evaluation, and funding applications.
- Assist agencies with custom reports and queries for program evaluation and local planning needs.

GOVERNANCE AND COLLABORATION

- Collaborate with the HMIS Users Workgroup in policy development and implementation.
- Serve as the CoC's representative applicant to HUD for HMIS-related grant funds.
- Designate representatives to the Oregon Multi-CoC HMIS Governance Committee and participate in statewide HMIS governance activities to ensure alignment across regions.

HMIS USERS WORKGROUP RESPONSIBILITIES

The HMIS Users Workgroup supports CoC governance and the effective operation of the Homeless Management Information System (HMIS). The Workgroup is composed of Agency Administrators and serves as the primary forum for collaboration, feedback, and system improvement across participating agencies.

Responsibilities include:

- Identify Barriers – Reviewing and identifying barriers to the implementation of the CoC's Data Quality Plan and recommending strategies to address those barriers.
- Support Agencies – Ensuring participating agencies have the resources, training, and support needed to maintain timely, complete, and accurate data entry in HMIS.

- Review and Recommend HMIS Policies – Reviewing proposed HMIS policies and protocols and making recommendations to the HMIS Lead and the CoC Board for adoption and implementation.

ANNUAL REVIEW AND APPROVAL

The HMIS Users Workgroup is responsible for leading the annual review and recommending updates to HMIS policies and procedures, in coordination with the HMIS Lead.

Responsibilities include:

- Review the HMIS Privacy Plan, Security Plan, Data Quality Plan, and HMIS Policies and Procedures Manual at least once per year.
- Collaborate with the HMIS Lead to present updates or recommended revisions to the CoC Board of Directors for approval.
- Ensure documentation of CoC Board approval is maintained in official meeting records.
- Communicate approved updates, revisions, or new training requirements to all Agency Administrators through the HMIS Users Workgroup and email distribution.
- Ensure each participating agency disseminates updated guidance to its HMIS users and verifies completion of any required training.

SYSTEM ADMINISTRATOR RESPONSIBILITIES

As the Continuum of Care's HMIS System Administrator, Oregon Housing and Community Services (OHCS) is responsible for the overall technical management, oversight, and coordination of the HMIS software and vendor relationship. OHCS ensures the system functions reliably, securely, and in full compliance with HUD data and system requirements.

Key responsibilities include, but are not limited to:

- Designate a single, centralized information system to serve as the official HMIS software for the geographic area.
- Maintain direct communication with the HMIS vendor to ensure consistent and reliable system support.
- Coordinate software updates, feature enhancements, and technical troubleshooting across participating agencies.
- Manage the vendor relationship, including contract administration, user licensing, and compliance with HUD HMIS requirements.
- Review and approve all changes to the HMIS software environment, including configuration settings, permissions, and data-sharing protocols.

Refer to [Section 9: System Administration and Operations](#) for the required account, access, and security standards that Agency Administrators must implement.

Refer to [Section 12: Change Management](#) for configuration, testing, and implementation of HUD Data Standards updates.

5. PARTICIPATION REQUIREMENTS

HMIS PARTICIPATION

In accordance with 24 CFR 578.7(b), all Continuum of Care (CoC) and Emergency Solutions Grant (ESG) recipients and subrecipients are required to participate in the Homeless Management Information System (HMIS) as a condition of funding.

Additionally, specific funding streams administered by the State of Oregon through the Oregon Housing and Community Services (OHCS) also require HMIS participation as a condition of funding. MWVHA executes these grant agreements with subgrantees on behalf of OHCS and ensures HMIS participation requirements are met.

Participating agencies must:

- Execute an HMIS Participation Agreement with the HMIS Lead Agency before entering data.
- Comply with all adopted HMIS policies and plans, including the Privacy Plan, Security Plan, and Data Quality Plan.
- Ensure staff are trained on HMIS policies and procedures, including privacy and security standards, before gaining access.

Failure to comply with HMIS participation requirements may result in corrective action, including loss of funding eligibility.

All participating agencies and users are required to maintain a current HMIS User Agreement. User Agreements must be reviewed and updated at least annually, or more frequently as policies, systems, or data standards are revised.

Refer to [Section 7: Privacy, Security, and Confidentiality](#) for privacy and security requirements.

Refer to [Section 10: Monitoring and Compliance](#) for more details on the requirements related to monitoring and compliance.

ENFORCEMENT

Failure to comply with HMIS or comparable database participation requirements will result in corrective action or sanctions as outlined in [Section 10 Monitoring and Compliance](#). Participating Agencies are expected to cooperate fully with monitoring activities and address identified issues within the timeframes established by the HMIS Lead and CoC Board.

6. VICTIM SERVICE PROVIDER (VSP) COMPARABLE DATABASE REQUIREMENTS

In accordance with the Violence Against Women Act (VAWA) and 24 CFR § 578.103(b), agencies designated as Victim Service Providers must maintain a HUD-compliant, comparable database rather than directly entering client-level data into HMIS.

COMPLIANCE WITH HUD STANDARDS

- Collect all HUD Universal Data Elements (UDEs) and Program-Specific Data Elements (PDEs).
- Maintain the capability to produce all HUD-required reports, including APR-equivalent, CAPER, and LSA-equivalent reports.

PRIVACY AND SECURITY

- Maintain a written Privacy Plan, Security Plan, and Data Quality Plan consistent with CoC policies and HUD HMIS Data Standards.

- Protect personally identifying information (PII) in compliance with VAWA confidentiality provisions and 24 CFR 578.103(b).

Refer to [Section 7: Privacy, Security, and Confidentiality](#) for privacy and security requirements.

DATA QUALITY AND REPORTING

Participating Agencies are responsible for maintaining high data quality standards and submitting accurate information in accordance with CoC, OHCS, and HUD requirements.

Responsibilities include:

- Submit de-identified aggregate data to the HMIS Lead according to the schedule and format outlined in the CoC Data Quality Plan and in compliance with OHCS and HUD reporting protocols.
- Provide aggregate reports from comparable databases in the required format and within the timelines established by OHCS and the CoC to ensure inclusion in system-wide reporting.
- Review and correct any data quality issues identified through CoC monitoring, HMIS Lead review, or HUD reporting processes within the designated correction period.
- Maintain ongoing data quality through regular internal reviews, adherence to data entry standards, and timely response to data quality notifications issued by the HMIS Lead.

PARTICIPATION AGREEMENT

- Sign a Comparable Database Participation Agreement with the HMIS Lead, outlining roles, obligations, and compliance requirements.
- Participate in CoC-led data quality reviews and receive technical assistance as needed.

ENFORCEMENT

Failure to comply with VSP comparable database requirements will result in corrective action or sanctions as described in [Section 10 Monitoring and Compliance](#). This includes potential impacts on funding eligibility and participation in CoC-led initiatives.

7. PRIVACY AND SECURITY PLAN

PRIVACY AND SECURITY PLAN

The **Security and Privacy Plan** establishes the safeguards, standards, and administrative procedures required to protect Personally Identifiable Information (PII) and ensure compliance with HUD's HMIS Data and Technical Standards (24 CFR § 580.35). This plan applies to the Alliance (as HMIS Lead), Oregon Housing and Community Services (as System Administrator), and all Participating Agencies that collect, enter, or access HMIS data.

This plan consolidates all privacy, security, and confidentiality requirements into a single, comprehensive framework that governs HMIS data protection, client rights, and user responsibilities. It defines the technical, physical, and administrative measures required to maintain system integrity, ensure secure data handling, and promote accountability across all HMIS partners.

PARTICIPATING AGENCY AND HMIS LEAD RESPONSIBILITIES

Participating Agencies and the HMIS Lead must:

- Comply with all applicable federal, state, and local privacy laws, including HIPAA and VAWA confidentiality provisions.
- Maintain and post a Privacy Notice at each intake and service location and make it available electronically upon request (see Section 7.2).
- Obtain and document client consent and Release of Information (ROI) before data sharing (see Section 7.3).
- Ensure compliance with all security requirements described in Section 7.5.
- Require all HMIS users to complete annual Privacy and Security training (see Section 13).
- Maintain system audit trails and activity logs for at least seven (7) years, consistent with Section 10: Documentation and Recordkeeping.
- Report any known or suspected security or privacy breach immediately, following Section 7.7: Security Breach Protocol.

PRIVACY NOTICE REQUIREMENTS

- Post a Privacy and Security Notice at each intake location, lobby, and other client service areas.
- Provide the Privacy Notice in writing upon request and publish it on the agency's website, if one exists.
- Inform clients at the time of enrollment how their data will be collected, used, stored, and shared.

CLIENT CONSENT AND RELEASE OF INFORMATION

- Obtain a signed HMIS ROI at each enrollment before sharing any client information with other agencies.
- Ensure each adult household member signs their own ROI; parents or guardians may consent for minors.
- Honor a client's right to refuse HMIS data entry or restrict data sharing without denying services (except where HUD mandates participation).
- Document and adhere to any client-imposed restrictions on data sharing.
- Record and maintain an active digital ROI in HMIS for each client to verify consent for data entry and authorized sharing.

CLIENT RIGHTS

Clients have the right to:

- Know what data is collected, how it is used, and with whom it is shared.
- Review their own HMIS record.
- Refuse to provide specific information.
- Request that their record or portions of their record be locked or made private.

SECURITY REQUIREMENTS

- Maintain secure internet access, current virus protection, an active firewall, an updated internet browser, and a password-protected screensaver that activates after five minutes of inactivity on all HMIS workstations.
- Assign each user a unique User ID and strong password; credential sharing is prohibited.
- Position computer screens to prevent unauthorized viewing of client data.
- Use HMIS IDs or de-identified information when transmitting data electronically; email and public Wi-Fi are not secure for PII.
- Secure any data printed, downloaded, or stored outside of HMIS.

Refer to Confidentiality Standards below for responsibilities related to printed materials and physical records.

CONFIDENTIALITY STANDARDS

- Prohibit disclosure of PII to entities outside the CoC's HMIS partners without client consent, except as permitted by law.
- Restrict access to areas where HMIS data is collected or stored to authorized personnel only.
- Store paper records in locked cabinets within locked offices.
- Ensure all HMIS users complete annual privacy and security training.

SECURITY BREACH PROTOCOL

Participating Agencies must immediately report any known or suspected breach of HMIS security or client confidentiality to the HMIS Lead.

- Identify and report breaches (including unauthorized access, loss or theft of information, or system compromise).
- Notify the HMIS Lead within 24 hours of discovery.
- Document incidents; the HMIS Lead will notify the CoC Board within five (5) business days and coordinate investigation and remediation with the vendor.
- Notify affected clients as required by federal and state laws.

Agencies that fail to report breaches promptly may be subject to corrective action, including suspension of HMIS access or funding impacts as described in Section 10: Monitoring and Compliance.

MONITORING AND ENFORCEMENT

- Conduct periodic data quality reviews, user audits, and site monitoring visits to assess compliance.
- Address non-compliance through corrective action, suspension of HMIS access, or funding impacts as determined by the CoC Board.

Refer to [Section 10: Monitoring and Compliance](#) for more details on the requirements related to monitoring and compliance.

8. DATA COLLECTION AND QUALITY

The Alliance and all HMIS Participating Agencies must collect, enter, and maintain client-level data in accordance with HUD HMIS Data Standards and CoC policies. Data collection and quality are crucial for ensuring accurate reporting, effective community planning, and compliance with federal and state regulations.

REQUIRED DATA ELEMENTS

- Collect and enter all HUD-required Universal Data Elements (UDEs) and applicable Program-Specific Data Elements (PDEs).
- Gather any additional data elements required by the CoC or state funding sources.
- Conduct direct client interviews whenever possible and document all collected data in client records.

TIMELINESS STANDARDS

- Enter client enrollment data into HMIS within three (3) business days of a program entry.
- Record client exit data within three (3) business days of program completion.
- Input service transactions and assessments within three (3) business days of service delivery.
- Maintain all active client records in current status and close them promptly when services end.

COMPLETENESS STANDARDS

- Complete all required data fields at the time of entry.
- Limit “Don’t Know,” “Refused,” or “Data Not Collected” within the thresholds defined in the CoC Data Quality Plan.
- Review and correct records regularly to address missing or incomplete information.

ACCURACY STANDARDS

- Ensure that all data accurately reflects information provided by the client or supported by official documentation (e.g., identification, eligibility paperwork).
- Avoid making assumptions or altering client responses to fit program criteria.
- Verify and correct records routinely to maintain consistency across data elements.

DATA QUALITY MONITORING

- Conduct regular data quality reviews in alignment with the CoC’s Data Quality Plan.
- Utilize automated reports, desk reviews, and on-site monitoring to assess data accuracy and completeness.
- Distribute data quality reports to agencies identifying errors, missing information, or timeliness issues, and require corrections within the specified timeframe.

CORRECTIVE ACTION

Agencies failing to meet data quality standards will be required to participate in targeted technical assistance. Ongoing monitoring, enforcement procedures, and potential sanctions for unresolved issues are detailed in [Section 10: Monitoring and Compliance](#).

9. SYSTEM ADMINISTRATION AND OPERATIONS

The Alliance, as the HMIS Lead, is responsible for ensuring the secure and effective operation of the Homeless Management Information System (HMIS) and for ensuring that Participating Agencies and their designated Agency Administrators meet the following system administration and operations standards:

USER ACCOUNT MANAGEMENT

- Assign each HMIS user a unique User ID and password.

- Ensure that each user account corresponds to a single individual; shared accounts are prohibited.
- Set user access levels based on job function and the principle of least privilege.
- Deactivate user accounts promptly when an individual separates from the agency, changes position, or no longer requires HMIS access for their job duties.

ACCESS AND AUTHENTICATION

- Require strong passwords (minimum of eight characters with upper/lower case, numbers, and special characters) and regular password changes for all user accounts.
- Implement two-factor authentication when supported by the HMIS vendor.
- Configure workstations to lock automatically after five minutes of inactivity and require re-authentication to resume access.
- Deactivate user accounts automatically after thirty (30) consecutive days of inactivity to maintain system security.

SYSTEM OPERATIONS AND MAINTENANCE

- The HMIS Lead will maintain vendor support agreements to ensure uptime, patching, and functionality.
- The system must undergo regular updates, including software upgrades, bug fixes, and feature enhancements as provided by the vendor.
- Routine system health checks and backups must be performed according to the vendor's specifications and CoC policies.
- Disaster recovery procedures must be documented and tested at least annually.

DATA SECURITY SAFEGUARDS

- Install and maintain current antivirus protection, firewall protection, and a supported internet browser on all devices accessing HMIS.
- Prohibit the use of public Wi-Fi and public workstations to access HMIS.
- Protect the physical security of any printed HMIS data by storing records in locked cabinets within locked offices.

TECHNICAL SUPPORT

- Provide or coordinate technical support for user access, account setup, password resets, error troubleshooting, and system performance issues.
- Establish and follow internal agency protocols to escalate technical issues to the designated Agency Administrator before contacting the HMIS Lead.

MONITORING AND COMPLIANCE

Monitoring and enforcement of system administration requirements will follow the processes described in [Section 10: Monitoring and Compliance](#). Agencies found to be out of compliance with system administration or security requirements will be subject to corrective actions or sanctions as defined in that section.

10. MONITORING AND COMPLIANCE

The Alliance, as HMIS Lead, is responsible for ensuring that all Participating Agencies and Victim Service Providers (VSPs) comply with HMIS policies, HUD HMIS Data Standards, and applicable federal and state regulations.

MONITORING ACTIVITIES

The HMIS Lead will conduct regular monitoring of HMIS participation.

Monitoring activities include, but are not limited to:

- Data Quality Reviews: Evaluation of timeliness, accuracy, and completeness of data entry, in accordance with benchmarks defined in the CoC's Data Quality Management Plan.
- Privacy and Security Compliance: Verification that users and agencies follow required privacy, confidentiality, and data-sharing standards.
- Agreement Verification: Confirmation that all Participation Agreements and User Agreements are current and properly executed.
- Training Compliance: Review of training records to confirm completion of required annual Privacy and Security training.
- Cybersecurity and Access Controls: Assessment of cybersecurity measures, including antivirus protection, firewalls, secure internet connections, and proper use of authentication protocols to prevent unauthorized access.
- Document and Data Storage Practices: Review of where and how agencies store HMIS-related documents and downloaded data to ensure secure storage (e.g., encrypted systems, locked file storage, and restricted access).
- Site Visits and Virtual Reviews: Evaluation of workstation placement, password protection, and adherence to system security and confidentiality requirements.

Refer to [Section 7: Privacy, Security, and Confidentiality](#) for privacy and security requirements.

ERROR THRESHOLDS

Error rates and quality standards are defined in the Data Quality Management Plan. At minimum, HMIS participants must:

- Maintain a 95% completeness rate.
- Prevent "Client doesn't know/Client refused" responses from exceeding 10% for any field.
- Record client entry and exit data within three business days.
- Follow HUD's standards for Universal and Program-Specific Data Elements.

Errors may be categorized as minor, major, or systemic, depending on their frequency, scope, and severity, as determined by the HMIS Lead and the CoC Board in alignment with the Data Quality Management Plan.

Failure to meet data quality thresholds not only affects an individual agency. It can negatively impact the CoC's overall system performance, HUD reporting accuracy, and future funding opportunities. Persistent data quality issues can lead to a reduction in the CoC's competitive scoring in the HUD Continuum of Care Program Competition, which may result in reduced funding for the entire region. All Participating Agencies share collective responsibility for maintaining data integrity to protect community resources and ensure accurate representation of homelessness within the CoC.

REPORTING AND FEEDBACK

Participating Agencies will receive monitoring reports identifying findings, concerns, and areas for improvement. Agencies must correct issues within the timeframe specified.

Agencies may request technical assistance to address compliance issues.

CORRECTIVE ACTION

If deficiencies are not corrected, the HMIS Lead may implement corrective actions, including but not limited to:

- Provide required technical assistance or additional training.
- Suspend HMIS user accounts temporarily until issues are resolved.
- Increase the frequency of monitoring to ensure compliance.
- Refer the matter to the CoC Board for further action.

ENFORCEMENT

Continued noncompliance may result in sanctions, including:

- Suspend HMIS access.
- Withhold reimbursement for CoC- or ESG-funded expenses.
- Terminate existing grant agreements administered through the CoC.
- Prohibit the agency from applying for future funding opportunities administered by the CoC.

NOTE ON VOLUNTARY PARTICIPATION

Agencies that do not receive CoC, ESG, or state-administered funding are exempt from funding-related sanctions. However, all participating agencies, whether funded or voluntary, are expected to comply with HMIS privacy, security, and data quality standards. In cases of noncompliance, the HMIS Lead may limit or suspend access until corrective action is taken to protect client confidentiality and maintain data integrity.

Refer to [Section 10: Monitoring and Compliance](#) for more details on the requirements related to monitoring and compliance.

DUE PROCESS

Before the imposition of sanctions, the HMIS Lead will provide written notice of noncompliance, proposed corrective action, and a response timeline. Agencies may submit documentation, request technical assistance, or demonstrate compliance within the specified timeframe. Unresolved issues will be referred to the CoC Board for final determination.

Refer to [Section 10: Monitoring and Compliance](#) for more details on the requirements related to monitoring and compliance.

COC BOARD OVERSIGHT

The CoC Board retains final decision-making authority on enforcement actions. The Board will review and approve monitoring frameworks, corrective action processes, and any proposed updates by the HMIS Lead or the HMIS Users Workgroup.

DOCUMENTATION AND RECORDKEEPING

The HMIS Lead will maintain complete documentation to demonstrate compliance with HUD requirements and CoC policies, including:

- Executed Participation Agreements and Comparable Database Agreements.
- User Agreements and annual training completion records.
- Data quality monitoring reports and agency corrective action plans.
- CoC Board minutes approving HMIS policies and updates.
- Documentation of any reported security incidents and their resolution.

All documentation will be retained for a minimum of seven (7) years, or longer if required by federal or state regulations, funding agreements, or ongoing audits. Records will be stored in a secure and accessible manner and made available for HUD monitoring or audit upon request.

11. REPORTING AND USE OF DATA

The Alliance, as HMIS Lead, is responsible for producing all reports required under federal regulation and by the CoC Board of Directors. Participating Agencies must ensure that client data is accurate, complete, and entered promptly so that needed reports can be generated.

REQUIRED FEDERAL REPORTS

The HMIS Lead will generate and submit the following reports in accordance with HUD deadlines and requirements:

- Point-in-Time Count (PIT): Annual count of sheltered and unsheltered homeless persons.
- Housing Inventory Count (HIC): Annual inventory of housing resources dedicated to serving homeless persons.
- Longitudinal Systems Analysis (LSA): Annual system-level report submitted to HUD for national analysis.
- Annual Performance Reports (APR): Submitted for all CoC-funded projects, based on HMIS data.
- Consolidated Annual Performance and Evaluation Report (CAPER): Submitted for ESG-funded projects, based on HMIS data.
- Other reports as may be required by HUD, the State of Oregon, or other funders.

LOCAL DATA USE

The HMIS Lead will collect, analyze, and distribute aggregate data to inform CoC Board decisions, evaluate system performance, and support community initiatives.

- Provide aggregate HMIS data to the CoC Board upon request for planning, performance measurement, funding applications, and community reporting.
- Prepare routine dashboards, data quality reports, and other local analyses for use by committees, workgroups, and partner agencies.
- Distribute reports in a manner that protects client privacy and confidentiality; personally identifying information (PII) must not be released in public reports.

AGENCY REPORTING REQUIREMENTS

Participating Agencies are responsible for ensuring the accuracy and completeness of their HMIS data prior to report submission and for responding to data validation findings issued by the HMIS Lead.

- Review and certify agency-level HMIS data before the submission of any HUD-required report.
- Correct data errors identified through report validation processes within the timeframe specified by the HMIS Lead.
- Request project-level reports from the HMIS Lead as needed to support program evaluation, monitoring, and planning.

Refer to [Section 8: Data Collection and Quality](#) for standards that guide data validation and corrections

DATA SHARING AND PUBLICATION

The CoC Board and HMIS Lead share responsibility for deciding what data can be shared publicly and ensuring all published reports protect client confidentiality.

- Retain CoC Board authority to approve the public release of aggregate HMIS data.
- Review all reports intended for external publication to ensure compliance with privacy, security, and confidentiality standards.
- De-identify any data shared outside the CoC to ensure compliance with HUD and VAWA confidentiality requirements.

Refer to [Section 7: Confidentiality Standards and Security Requirements](#) for limits on sharing PII.

ENFORCEMENT

Failure to meet reporting requirements, including timely certification and correction of data errors, will be addressed through the corrective action and sanction processes outlined in [Section 10: Monitoring and Compliance](#).

12. CHANGE MANAGEMENT

The Alliance, as HMIS Lead, is responsible for implementing and communicating all changes to HUD Data Standards, HMIS system configuration, and related policies. The HMIS Lead will coordinate with the HMIS Users Workgroup, Participating Agencies, and the CoC Board of Directors to ensure timely compliance, effective communication, and continuous improvement.

HUD DATA STANDARDS UPDATES

The HMIS Lead is responsible for reviewing, assessing, and implementing HUD-issued updates to the HMIS Data Standards and related guidance.

- Review all HUD-issued updates to HMIS Data Standards, Notices, and Federal Partner reporting requirements upon release.
- Identify and summarize revisions to data collection elements, reporting formats, privacy and security requirements, or other HMIS-related policies.
- Assess the impact of required changes on system configuration, reporting, training, and agency workflows.

Refer to [Section 4: System Administrator Responsibilities](#) for vendor oversight responsibilities related to system configuration.

Refer to [Section 7: Privacy, Security, and Confidentiality](#) for privacy and security requirements.

POLICY AND PROCEDURE REVISIONS

The HMIS Lead, in collaboration with the HMIS Users Workgroup and CoC Board, is responsible for maintaining current, compliant HMIS policies and procedures.

- Update the HMIS Policies and Procedures Manual to reflect new HUD requirements and operational changes.
- Review draft revisions through the HMIS Users Workgroup prior to submission to the CoC Board for final approval.
- Distribute approved policy updates to all Participating Agencies within thirty (30) days of CoC Board approval.

Refer to [Section 4: HMIS Users Workgroup Responsibilities](#) for details on the annual review and annual process.

SYSTEM CONFIGURATION

- The HMIS Lead will work with the HMIS vendor to ensure timely configuration of system updates required to implement HUD Data Standards.
- Any changes to data elements, user roles, or reporting functionality will be documented in system release notes shared with agencies.
- The HMIS Lead and Coordination Entity must test configuration changes before rollout.

Refer to [Section 4: System Administrator Responsibilities](#) for details on the annual review and annual process.

COMMUNICATION OF CHANGES

- The HMIS Lead will notify Participating Agencies of HUD Data Standards updates and related policy changes through written guidance, agency administrator briefings, and the HMIS Users Workgroup.
- Agencies are responsible for disseminating this information to their staff and ensuring compliance with updated standards.
- All HMIS users must complete any additional training modules required as part of the change implementation process.

IMPLEMENTATION TIMELINE

- The HMIS Lead will publish an implementation timeline for each major HUD Data Standards update, including deadlines for system changes, policy adoption, and training completion.
- Agencies must complete required updates and training within the established timeline to maintain compliance.

CONTINUOUS IMPROVEMENT

- Feedback on the implementation of changes will be collected from Participating Agencies through the HMIS Users Workgroup.
- Lessons learned from each change cycle will be documented and used to improve future change management processes.

13. TRAINING AND TECHNICAL ASSISTANCE

The Alliance, as HMIS Lead, is responsible for ensuring that all HMIS users and Agency Administrators receive appropriate training and technical assistance to maintain compliance with HUD requirements and CoC policies.

USER TRAINING REQUIREMENTS

- **Pre-Access Training:** All new HMIS users must complete privacy, security, and data entry training before being issued an HMIS User ID.
- **Annual Training:** All HMIS users must complete annual Privacy and Security training and any additional modules required by the HMIS Lead or HUD.
- **Role-Based Training:** Users must complete training specific to their access role (e.g., data entry, reporting, administration).
- **Documentation:** Completion of training must be documented and kept on file by the HMIS Lead. Users who fail to complete training will have their HMIS access suspended until requirements are met.

TECHNICAL ASSISTANCE (TA) OFFERINGS

- The HMIS Lead will provide technical assistance to Participating Agencies on:
 - Data entry and reporting requirements.
 - Privacy, security, and confidentiality standards.
 - Data quality monitoring and error correction.
 - Compliance with HUD Data Standards and CoC policies.
- TA may be provided in various formats, including one-on-one support, webinars, group workshops, written guidance, and desk aids.
- Agencies experiencing repeated compliance or data quality issues may be required to participate in targeted TA as part of a corrective action plan.

Refer to [Section 8: Data Collection and Quality](#) for more information on Data Quality Standards.

Refer to [Section 10: Monitoring and Compliance](#) for more details on the requirements related to monitoring and compliance.

ENFORCEMENT

- Failure to complete required training or to participate in required technical assistance may result in suspension of user accounts, corrective action, or other enforcement measures as outlined in [Section 10: Monitoring and Compliance](#).

14. APPENDICES



Mid-Willamette Valley Homeless Alliance

APPENDIX A:

GLOSSARY OF TECHNICAL TERMS

CORE HMIS AND COC TERMS

Annual Performance Report (APR)

A HUD-required report generated from HMIS data for each CoC-funded project. Used to evaluate performance and determine continued eligibility for funding.

Consolidated Annual Performance and Evaluation Report (CAPER)

A HUD-required report for ESG-funded projects that evaluates program outcomes based on HMIS data.

Contributing HMIS Organization (CHO)

Any agency or program that enters data into HMIS under a signed Participation Agreement.

Data Quality Plan

A CoC-adopted policy that defines standards for timeliness, completeness, and accuracy of HMIS data, as well as monitoring and corrective action procedures.

Homeless Management Information System (HMIS)

The community-wide data system designated by the CoC to collect information about the characteristics and service needs of people experiencing homelessness and those at risk.

Longitudinal Systems Analysis (LSA)

An annual system-level report generated from HMIS and submitted to HUD. Provides data for national analysis of homelessness trends.

Point-in-Time (PIT) Count

A HUD-mandated count of sheltered and unsheltered homeless individuals on a single night in January. Data is entered into HMIS or collected by other approved methods.

Housing Inventory Count (HIC)

An annual inventory of all beds and units dedicated to serving homeless individuals and families, reported to HUD along with the PIT Count.

Personally Identifiable Information (PII)

Any information that can be used to identify a client, such as name, Social Security Number, date of birth, or address.

Program-Specific Data Elements (PDEs)

Additional data required for some federal project types, such as income and sources, non-cash benefits, disabilities, health insurance, and housing move-in date.

Release of Information (ROI)

Written or electronic authorization by a client that specifies what personal information may be shared, with whom, and for what purpose.

Universal Data Elements (UDEs)

Baseline data elements required by HUD to be collected on every client, regardless of project type.

Includes Name, Date of Birth, Gender, Race, Ethnicity, Veteran Status, and project entry/exit dates.

Violence Against Women Act (VAWA) Confidentiality

Federal requirements that prohibit Victim Service Providers (VSPs) from entering client-identifying information into HMIS. Instead, VSPs must use a comparable database and follow strict confidentiality provisions.

COMPLIANCE AND TECHNICAL TERMS

Audit Trail

The automatic system record that logs all HMIS user activity, including logins, data entry, edits, and report runs.

Comparable Database

A secure database used by VSPs that meets HUD HMIS Data Standards and VAWA confidentiality rules. Must be capable of generating HUD-required reports.

Encryption

The process of encoding electronic data (such as HMIS records) to prevent unauthorized access.

Multi-CoC HMIS Governance Committee

A statewide or regional body that oversees HMIS governance across multiple CoCs to ensure consistency and compliance with HUD standards.

Participation Agreement

A written agreement between the HMIS Lead and each Contributing HMIS Organization (CHO) outlining roles, responsibilities, and compliance expectations.

Timeliness Standard

The requirement that client data (entry, exit, services) be entered into HMIS within a set timeframe (usually five business days).

Two-Factor Authentication (2FA)

An additional security measure requiring a second form of verification (e.g., code sent to a mobile device) when logging into HMIS.

User ID and Password

A unique credential assigned to each HMIS user. Accounts may not be shared between staff.

HUD REPORTS AND ANALYSIS

System Performance Measures (SPMs)

A set of HUD-defined metrics that evaluate overall CoC performance, including length of time homeless, returns to homelessness, and employment/income growth.

Data Quality Reports

Reports generated by the HMIS Lead to identify missing, incomplete, or inaccurate client records. Used for monitoring and corrective action.

Custom Reports

Specialized reports requested by agencies to analyze program outcomes, funding applications, or community planning.