

# Montgomery County Continuum of Care Governance Charter



Montgomery County Continuum of Care  
Revised: March 29, 2019  
Adopted: December 17, 2013

## Background and Purpose

The [Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009](#) (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act. The HEARTH Act amendments to the McKinney-Vento Homeless Assistance Act codified in law the role and functions of the Continuum of Care (CoC); thus each community must establish a CoC in compliance with the new CoC Program interim rule. HUD published the [Continuum of Care Program interim rule](#) (24 CFR Part 578) in the Federal Register on July 31, 2012. The rule now governs the CoC Program.

HUD requires communities that receive funds under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act to establish a local Continuum of Care to promote a community-wide commitment to ending homelessness, provide funding for efforts to promote community-wide planning and strategic use of resources to address homelessness, improve coordination and integration with mainstream resources, and other programs targeted to people experiencing homelessness.

The Montgomery County Continuum of Care (CoC) coordinates the community's policies, strategies, and implementation of a housing and services system to prevent and end homelessness through a collaboration of public and private sector groups.

The Montgomery County CoC's work includes gathering and analyzing information in order to determine the local needs of people experiencing homelessness, implementing strategic responses, educating the community on homeless issues, providing advice and input on the operations of homeless services, and measuring CoC performance. Support for CoC efforts include federal, state, local, and private funds, including U.S. Department of Housing and Urban Development (HUD) funding awarded through the Continuum of Care funding competition.

This Governance Charter outlines the roles and responsibilities of the Montgomery County Continuum of Care, the Montgomery County Interagency Commission on Homelessness, ICH/Continuum of Care Committees, the Continuum of Care Lead Agency, the Collaborative Applicant and the Homeless Management Information System (HMIS) Lead. Below is a brief description of each entity:

- The **Montgomery County Continuum of Care (CoC)** is a year-round planning body of representative stakeholders in the community's work toward ending homelessness. Its work includes gathering and analyzing information in order to determine the local needs of people experiencing homelessness, implementing strategic responses, and measuring results.
- The **Montgomery County Interagency Commission on Homelessness (ICH)** is a group of appointed leaders of the Continuum of Care who have authority to make decisions on behalf of the Continuum of Care (i.e. CoC Governing Board).
- The **ICH/Continuum of Care Committees** are the action planning components of the Continuum. In the Committees, strategies are developed, deepened and expanded upon. The Interagency Commission on Homelessness delegates decision-making authorities to committees, oversees their implementation, and reviews and takes action on recommendations proposed from committees.

The Montgomery County CoC has designated the Montgomery County Department of Health and Human Services (DHHS) as the entity for the following roles:

- The **Continuum of Care Lead Agency** provides technical, administrative and meeting support to the Continuum of Care, the Interagency Commission on Homelessness and the Committees.
- The **Collaborative Applicant** prepares and submits the Continuum of Care funding application to HUD each year.
- The **HMIS Lead** provides oversight and implementation support to the Montgomery County Continuum of Care's HMIS.
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## Responsibilities of the Montgomery County CoC

The responsibilities of the Montgomery County CoC include the following activities outlined below under CoC Operations, Planning, HMIS, preparing an application for Federal CoC Program funds, and coordinating with Emergency Solutions Grant recipients. The purpose of the CoC Governance Charter is to outline how these responsibilities are carried out through the governing structure and designated entities.

## A. Operations of the CoC

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- Develop, follow, and update annually this Governance Charter, which will include all procedures and policies needed to comply with HUD requirements and with HMIS requirements, including a code of conduct and recusal process for the Commission, its chair(s), and any person acting on behalf of the Montgomery County CoC board
- Establish and operate a coordinated assessment system in accordance with HUD regulations<sup>1</sup>
- Establish and consistently follow written standards for providing CoC assistance
- Consult with recipients and subrecipients to establish performance targets appropriate for population and program type
- Monitor performance of CoC recipients and subrecipients
- Evaluate the outcomes of projects funded under CoC programs
- Take action against CoC projects that perform poorly
- Report the outcomes of CoC projects to HUD annually

## B. Planning Activities of the CoC

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- Coordinate the implementation of a housing and service system within the Montgomery County CoC geographic area that meets the needs of homeless individuals and families. At a minimum, such a system encompasses the following:
  - Outreach, engagement, and assessment
  - Shelter, housing, and supportive services
  - Prevention strategies
- Plan for and conduct a Point-In-Time (PIT) count of homeless persons within the CoC, including a housing inventory of shelters, transitional housing, and permanent housing for homeless persons
- Conduct an annual gaps analysis of the needs of homeless people, as compared to available housing and services within the CoC geographic area
- Provide information required to complete the Consolidated Plan within the CoC geographic area

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<sup>1</sup> [Notice CPD-17-01: Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System](#)

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### **C. Designating and Operating a Homeless Management Information System**

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- Designate a single HMIS for the CoC's geography, and an eligible entity to serve as the CoC's HMIS Lead
- Review, revise, and approve a CoC HMIS data privacy plan, data security plan, and data quality plan
- Ensure that the HMIS is administered in compliance with HUD requirements
- Ensure consistent participation by CoC recipients and subrecipients in the HMIS

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### **D. Prepare an Application for CoC Funds**

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- Designate a Collaborative Applicant to apply for HUD funding
- Design, operate, and follow a collaborative process for the development of a CoC application to HUD
- Establish priorities that align with local and federal policies for recommending projects for CoC Program funding
- Designate an eligible Collaborative Applicant to collect and combine the required application information from all applicants
- Determine whether to select the Collaborative Applicant to apply for Unified Funding Agency (UFA) designation from HUD
- Approve the final submission of applications in response to the CoC Notice of Funding Availability (NOFA)

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### **E. Coordinate with Emergency Solutions Grant Recipient**

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Emergency Solutions Grant (ESG) funds are awarded to Montgomery County annually (based on HUD formula and annual appropriations). Montgomery County DHHS is the designated administering department for the funds and along with ICH, ensures the coordination of the following ESG activities are in consultation with the Montgomery County CoC:

- Participates in the CoC's coordinated assessment system
- Follows the CoC written standards for providing assistance
- Monitors performance of ESG recipients (if applicable)
- Evaluates outcomes of projects funded under ESG
- Takes action against ESG projects that perform poorly
- Reports the outcomes of ESG projects to HUD annually

- Ensures consistent participation by ESG recipients and subrecipients (if applicable) in the HMIS system
- Consults with state and local government ESG recipients within the Montgomery County CoC on the plan for allocating ESG funds and reporting on and evaluating the performance of ESG recipients and subrecipients

## Full CoC Membership

### A. Meetings and Agenda

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The Montgomery County CoC will hold meetings of the full CoC membership at least semiannually. The CoC, through the Governance Committee, will announce the date, time and location of these meetings at least one month in advance and will publish the meeting agenda at least 24 hours before the meeting. Meeting agendas will be posted online at the [Montgomery County CoC website](#) for review prior to the meeting.

### B. Membership and Voting

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Membership is divided into two categories: general membership and voting membership. There is currently no fee to participate.

#### General membership

The CoC shall be open to any organizations or persons residing or doing business in Montgomery County with an interest in preventing and/or ending homelessness in the community. Membership may include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, philanthropic groups, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals. General members are welcome to attend the full CoC meetings held during the year.

#### Voting membership

Voting membership shall be open to any general member of the CoC who wants to participate more thoroughly in the CoC throughout the year, via committee, subcommittee, and/or workgroup. To become a voting member an individual or organization must follow the application and selection process of the relevant committee, subcommittee, or workgroup and be approved

by the relevant committee, subcommittee or workgroup or directly approved by the Governance Committee. Any individual or organization may also express interest in participation in the CoC as a voting member directly to the Governance Committee via the Chair or Co-chair.

Organizations participating in the CoC voting process will have one vote per organization. This does not preclude the organization from having more than one employee attend CoC committee, subcommittee, workgroup and/or full CoC meetings. In situations where more than one employee from an organization is present at a committee, subcommittee, workgroup or full CoC meeting, only one person can represent the organization in a voting role. Furthermore, if there are different employees from the same organization, on different committee, subcommittee and/or workgroups each employee can vote at their own committee, subcommittee and/or workgroup meeting (as long as only one person per agency is voting at that meeting). Individuals, including homeless and formerly homeless persons, would gain approval to vote as an individual.

### **Voting**

Decisions will be made by majority vote.

## **C. Duties**

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The Montgomery County CoC will adopt, follow, and update annually a governance charter, including board selection, in consultation with the Collaborative Applicant, HMIS Lead, and the Governance Committee.

## **Interagency Commission on Homelessness**

The CoC has approved the Interagency Commission on Homelessness (ICH) to act on behalf of the CoC as the governing board. The ICH is comprised of an odd number not to exceed 25 members.

### **A. Membership of Governing Board**

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Members of the Governing Board are members of the Continuum of Care. The composition of the Governing Board is as follows:

- a) The Executive must appoint the following to serve as ex-officio members:
  - 1) Director of the Department of Health and Human Services;
  - 2) Chief of Services to End and Prevent Homelessness of the Department of Health and Human Services;

- 3) Director of the Department of Housing and Community Affairs;
  - 4) Executive Director the Housing Opportunities Commission;
  - 5) A representative from the Office of the County Executive, selected by the County Executive.
  - 6) A member of the County Council selected by the Council President
  - 7) A member of the State Legislative Delegation selected jointly by the Chairs of the House and Senate Delegations.
- b) An Intragovernmental Advisory Committee formed by the Commission will recruit and nominate 4 members from county government agencies, which *may* include any of the following:
- 1) Homeless Liaison for Police
  - 2) Sheriff's Office
  - 3) Department of Corrections and Rehabilitation
  - 4) Department of Recreation
  - 5) Department of Parks and Planning
  - 6) CountyStat
  - 7) Fire and Rescue
  - 8) Regional Services Directors
  - 9) Montgomery College
  - 10) Montgomery County Public Schools
  - 11) Montgomery County Public Libraries
  - 12) Worksource Montgomery
  - 13) Department of Transportation
- c) The Governance committee will recruit and nominate 4 members representing the Homeless Services System which *must* include:
- 1) Organization providing services to households with children
  - 2) Organization providing services to youth
  - 3) Organization providing services to adult households without children
  - 4) Organization providing homelessness prevention services
- d) The Governance committee will recruit and nominate 4 members representing private sector organizations, which *may* include individuals from the following sectors:
- 1) Behavioral Health
  - 2) Children and Youth
  - 3) Healthcare



- 4) Domestic Violence
  - 5) Aging and Senior services
  - 6) Disability Services
  - 7) Veteran Services
- e) The Governance committee will recruit and nominate 6 members representing the general public, including:
- 1) an individual who has previously or is currently experiencing homelessness;
  - 2) an individual representing the private philanthropic community;
  - 3) an individual representing an organization involved in the development of affordable housing; and
  - 4) three individuals who are residents of Montgomery County, Maryland, serving as representatives of the general public.
- f) The full term of each non-ex officio member is 3 years, with the option to extend with recommendation from the commission or a committee designated by the commission. If a member is appointed to fill a vacancy before a term expires, the successor serves the rest of the unexpired term

## B. Term Limits

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**For non-ex officio members:** The full term of each non-ex officio member is 3 years, with the option to extend with recommendation from the commission or a committee designated by the commission. If a member is appointed to fill a vacancy before a term expires, the successor serves the rest of the unexpired term

**For ex officio members:** The term limit is equal to the term of the member's respective position in their organization/department

## C. Voting and Decision-Making

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Each member of the Commission is a voting member. A quorum of 51% of voting members must be in attendance to hold a vote.

The Interagency Commission on Homelessness may delegate decision-making authorities to committees. However, any committee, subcommittee, or workgroup action not explicitly delegated by the Commission, is not the action of the Commission and must not bind the

Commission or its members. Decisions made by the committees will be decided by majority vote of committee membership. A quorum of 51% of voting members must be in attendance to hold a vote.

#### **D. Meetings**

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The Commission will meet bi-monthly and written agendas and meeting minutes will be kept and made public to promote transparency. Meetings of the full commission must be open to the public.

Committees, Subcommittees, and Workgroups will determine the frequency of their meetings but meet no less than quarterly. Committees, Subcommittees, and workgroups may have meetings open or closed to the public, but must keep written agendas and meeting minutes that will be kept and made public to promote transparency.

#### **E. Officers/Chairs/Staffing**

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The Executive must designate a Chair and Vice Chair, at the initial meeting of the Commission. Subsequently, a Chair and Vice Chair will be nominated by the Commission and confirmed by the Executive annually.

In its role as the CoC lead agency, the Montgomery County Department of Health and Human Services will provide support to the Commission.

The Commission may establish one or more committees, subcommittees or workgroups to assist in carrying out any function of the Commission. A committee, subcommittee or workgroup may include a person who is not a member of the Commission.

The Governance Committee will recruit and nominate a Chair, Co-Chair and Secretary for each committee for approval by the full Commission each January. No prohibition exists against the same co-chairs being elected each year. The committee positions are described below:

- I. Chair: Responsible for leading all aspects of the committee and representing the Committee on the Governance Committee, including reporting on the goals and progress of the committee's work and identifying recommendations that need to be acted or voted upon by the full ICH
- II. Co-Chair: Supports the Chair to lead the committee and serves in the Chair's role if the

Chair is absent

- III. Secretary: Responsible for record-keeping for the committee, including taking minutes and recording major deliberations and votes

## F. Duties of the Commission

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The Commission must:

- a) Annually review and update the Continuum of Care Governance Charter.
- b) Promote a community-wide goal to end and prevent homelessness;
- c) Develop a strategic plan to accomplish the community-wide goal;
- d) Monitor the performance of the homeless services system and any program that is a component of the Continuum of Care system, including:
  - 1) permanent housing;
  - 2) transitional housing;
  - 3) supportive services;
  - 4) homeless management information system; [[and]]
  - 5) homelessness prevention;
  - 6) emergency shelter;
  - 7) coordinated entry; and
  - 8) diversion
- e) Recommend to the Executive and Council any improvements to local policy to improve the system response to ending and preventing homelessness.
- f) Educate the community about homelessness, best practices to end and prevent homelessness, resources needed, and long-term savings that are achieved by providing permanent, stable housing; and
- g) Engage the private and public sector in the work of the commission and communicate funding and partnership priorities to organizations, including, businesses, corporations, philanthropic organizations or foundations, and any municipal, state or federal government agencies to improve the County's ability to end and prevent homelessness.
- h) By November 30 of each year, the Commission must submit to the Executive and Council a report that:
  - 1) provides data and trends regarding homelessness, including data from the Council of Government's Point-in-Time survey;
  - 2) identifies gaps in the Continuum of Care that prevent or impede the County's ability to address needs identified through the review of data on homeless;

- 3) makes recommendation for the capital and operating budget for the following fiscal year;
- 4) makes recommendation for any legislative or regulatory changes needed to implement the Continuum of Care strategic plan; and
- 5) reports on any educational or public outreach activities undertaken during the preceding year.

### **G. Statement of Ethics/Code of Conduct/Conflict of Interest Policy**

All representatives of the CoC, including ICH Commissioners, and members of committees, subcommittees and working groups with delegated authorities from ICH will comply with the Conflict of Interest requirements outlined in 24 CFR part 578.95 and uphold the highest standards of ethical conduct. These standards are outlined in the Montgomery County Statement of Ethics, Code of Conduct and Conflict of Interest Policies and Procedures attached as Appendix A of this Charter.

## **Continuum of Care Committees and Subcommittees**

The Montgomery County CoC will create seven committees to conduct the work of the CoC, including the Governance Committee, which has the authority to create additional committees, subcommittees, or workgroups based on need and recommendations from committees, subcommittees and workgroups, and majority vote of the Governance Committee. Each committee will be responsible for submitting regular reports to the Governance Committee on their activities.

### **Committee Composition and Membership**

#### Intragovernmental Advisory Committee:

The commission will form an intergovernmental advisory committee to select members of county government to serve as ICH commissioners.

#### Governance Committee

A Governance committee chaired by the Chair of ICH and the Chief of Services to End and Prevent Homelessness of the Department of Health and Human Services and include the Director of the Department of Housing and Community Affairs as well as the chairs of each of the six remaining committees. The governance committee will be responsible for ensuring effective governance of the CoC.

### Additional Committees:

All additional committees will operate with a chair, vice-chair, and secretary with membership composition representative of the community and in furtherance of the committee's purpose and established by the officers of the committee. The following committees have additional, specific membership requirements:

- 1) The People's Committee will include only individuals with lived experiences of homelessness.
- 2) The System Coordination Committee will be chaired by the Chief of Services to End and Prevent Homelessness of the Department of Health and Human Services, or designee.
- 3) The Partnerships and Funding Committee, in selecting its members, must seek to reduce the instances of perceived or actual conflicts of interest as much as possible.

### Subcommittees

Subcommittees are established to provide oversight or facilitate the development of policies related to a specific function of the CoC. There are three standing subcommittees listed below and further defined under their respective committee section:

- HMIS Subcommittee: Provides oversight of the HMIS
- Coordinated Entry System Subcommittee: Provides oversight of the community's Coordinated Entry System
- Allocation Subcommittee: Establishes process for review, approval, and rejection of applications for funding to the CoC Program

### Workgroups

With approval by the Governance Committee, committees and subcommittees may establish workgroups to assist with specific tasks, initiatives, and goals. These workgroups may be ad hoc or standing and operate as open or closed to the public. Workgroups should be organized to provide recommendations for actions or decisions to their respective committee and/or ICH for approval and adoption.

A graphic of the Montgomery County CoC's committee structure is attached to the end of this governance charter. The roles and responsibilities of each committee are defined below:

## A. Governance Committee

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- Scheduling and creating agendas for ICH meetings, reviewing committee reports in detail, and recommending actions to be voted on by ICH
- Coordinating with the full CoC to adopt, follow, and update annually a governance charter, to include a conflict of interest policy, in consultation with the Collaborative Applicant and HMIS Lead
- Issue a public invitation annually for new members to join within a geographic area
- Adopt and follow a written process to select a CoC Board and review, update, and approve at least once every 5 years
- Appoint additional committees, subcommittees, or work groups
- Assisting in planning of the CoC activities in coordination with appropriate groups including all other committees, subcommittees, and workgroups
- Reviewing summary reports from all activities of committees, subcommittees, and workgroups
- Approving all membership applications
- Holding meetings of the full membership, with published agendas, at least semi-annually

## B. System Coordination Committee

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- Coordinate the implementation of a housing and services system
- Recommend to the Executive and Council any improvements to local policy to improve the system response to ending and preventing homelessness
- Oversee the Coordinated Entry System Subcommittee, charged with establishing and operating a coordinated assessment system in consultation with recipients of ESG funds and establishing and following written standards for providing CoC assistance in consultation with recipients of ESG funds
- Conduct, at least biennially, a PIT count of homeless persons that meets HUD's requirements
- Oversee population specific workgroups

### C. Strategy and Planning Committee

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- Reviewing and monitoring aggregate CoC-wide performance of all CoC and ESG programs through HMIS data, including the Annual Progress Report (APR), Annual Homeless Assessment Report (AHAR), Point in Time (PIT) count, and Housing Inventory Chart (HIC)
- Developing, monitoring, and updating the CoC's Strategic Plan to end and prevent homelessness
- Overseeing the implementation of the Strategic Plan
- Conducting reviews of external policies and assessing impact on local efforts
- Conducting an annual gaps analysis of homelessness needs and services
- Submit to the Executive and Council an annual report

### D. Outcomes and Improvement Committee

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- Establishing performance targets appropriate for population and program type in consultation with recipients and subrecipients
- Monitoring recipients and subrecipients performance and
- Evaluating project outcomes of ESG and CoC programs, and reporting those outcomes to the Partnerships and Funding Committee
- Providing training and support on best practices
- Oversee HMIS, including establishing an HMIS subcommittee charged with:
  - Designate a single HMIS for its geographic area and designate an eligible applicant to manage its HMIS
  - Review, revise, and approve privacy, security and data quality plans
  - Ensure consistent participation of recipients/sub-recipients in HMIS
  - Ensure that HMIS is administered in compliance with HUD requirements

### E. Partnerships and Funding Committee

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- Reviewing performance of recipients and sub recipients and taking actions against poor performers
- Provide information required to complete the Consolidated Plan(s)
- Consult with State and local ESG recipients in the geographic area on the plan for allocating ESG funds and reporting/evaluating performance of ESG programs

- Recommend and promote partnerships with any private organization, business, corporation, philanthropic organization or foundation, and any municipal, state, or federal government agency to improve the County's ability to prevent and reduce homelessness
- Design, operate and follow a collaborative process for the development of applications and approve submission of applications in response to a CoC Program NOFA
- Establish priorities for funding projects
- Rank multiple applications if required by HUD
- The Collaborative Applicant must collect and combine the required application information from all projects within the geographic area and will apply for funding for CoC planning activities.

#### **F. People's Committee**

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- Provide critical input and feedback on ICH and committee work, including policy development and barriers and improvements to system coordination
- Recruit individuals with lived experience to participate in the efforts of the ICH and provide recommendations to ICH members and CoC stakeholders on how people with lived experience should be involved in all aspects of the homeless system operations and the CoC Governance structure and process

#### **G. Communications Committee**

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- Educate the community about homelessness, best practices to reduce homelessness, resources needed to reduce homelessness, and long-term savings that are achieved by providing permanent, stable housing
- Market the work of the Continuum of Care to the general public
- Manage the CoC's website and take lead role in events planning and messaging, including messaging and marketing of special initiatives

### **Designations**

#### **A. CoC Lead**

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Montgomery County DHHS will act as the CoC Lead that will complete designated work tasks assigned by the ICH and will provide meeting support for the Montgomery County Continuum of Care, ICH and all other committees and subcommittees. The CoC Lead Agency is responsible for



working with the ICH Chair and Governance Committee to schedule meetings, develop agendas, issue meeting materials and post all relevant documents to the Montgomery County Continuum of Care website. In addition, as the CoC lead, DHHS will:

- Support the planning and operations of the CoC
- Implement the CoC coordinated assessment system
- Coordinate and conduct the annual PIT count
- Coordinate and complete the HIC
- Providing information required to complete the Consolidated Plan

## **B. HMIS Lead**

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Montgomery County DHHS will act as the HMIS Lead. See HMIS Governance Charter for detailed responsibilities (Attachment A). At minimum the HMIS Lead will:

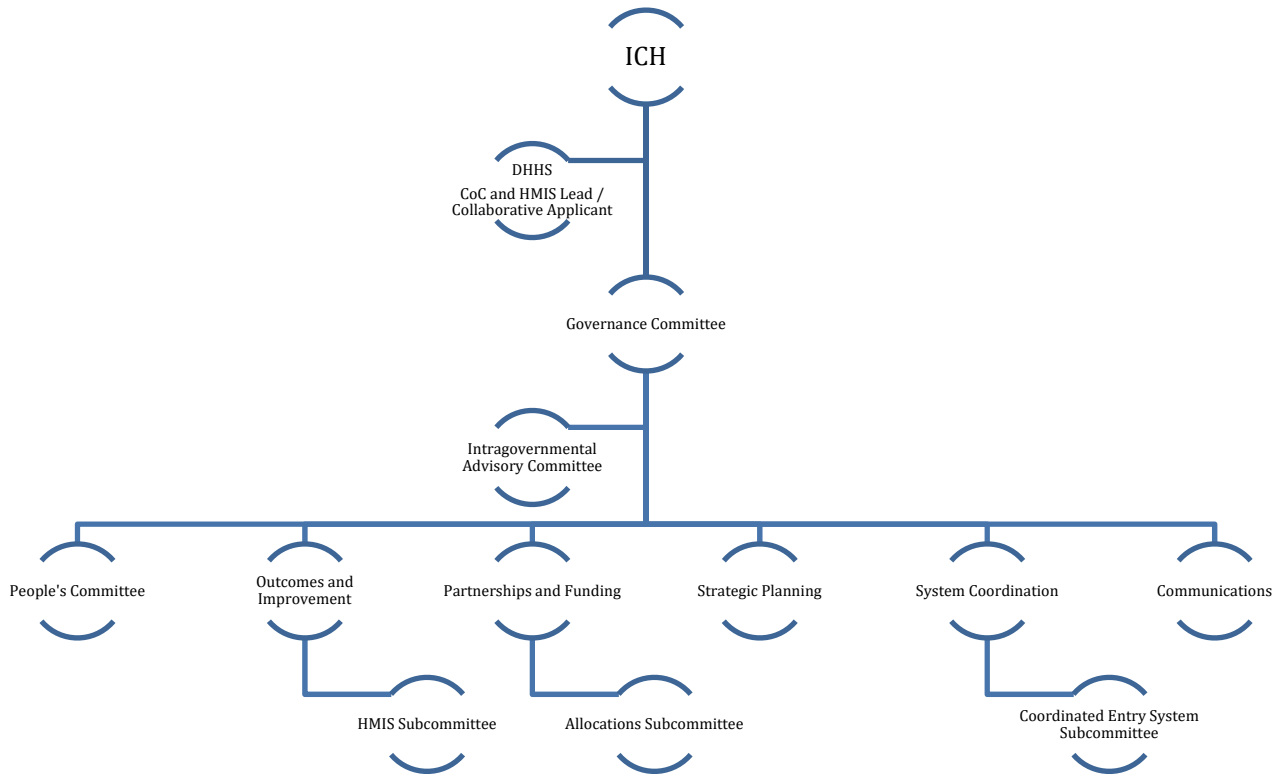
- Designate a single HMIS system and eligible applicant
- Review, revise, and approve privacy, security, and data quality plans
- Ensure consistent participation of recipients/subrecipients in HMIS
- Ensure that the HMIS is administered in compliance with HUD

## **C. Collaborative Applicant**

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Montgomery County DHHS will act as the Continuum of Care Collaborative Applicant. Duties will include:

- Coordinating, preparing, collecting information, and submitting the CoC Program application
- Applying for CoC Planning Funds
- Designing, operating, and following a collaborative process for the development of applications and approving submission of applications in response to a CoC Program NOFA



## **Montgomery County, MD Homeless Management Information Systems (HMIS) Governance Charter**

### **Background and Purpose**

The U.S. Department of Housing and Urban Development (“HUD”) mandates the use of a Homeless Management Information System (HMIS) for all communities and agencies receiving HUD Continuum of Care (“CoC”) and Emergency Solutions Grant program (“ESG”) funding.

HMIS is essential to efforts to coordinate client services and inform community planning and public policy. Each Continuum of Care is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.

Montgomery County Continuum of Care is the responsible for the oversight of the HMIS system for Montgomery County. The goal of the CoC's HMIS is to improve service delivery, expedite the client intake process, maintain comprehensive client records, track client outcomes, and monitor recidivism rates. Aggregate data from the HMIS is used to understand service population, measure program success in meeting contract deliverables, determine success and gaps in CoC program delivery and in the strategic planning process for the CoC.

### **Montgomery County Continuum of Care Responsibilities**

The Montgomery County CoC will:

- Designate a single information system as the official HMIS software for Montgomery County;
- Designate an HMIS Lead to operate the HMIS system;
- Review and adopt written policies and procedures for the operation of the HMIS that comply with all applicable Federal laws and regulations, and applicable state or local governmental requirements.
- Provide oversight of the HMIS Lead, including: the requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Contributing HMIS Organization (CHO) requiring the CHO to comply with federal regulations regarding HMIS and imposing sanctions for failure to comply; and maintaining documentation of compliance with the governance charter.

**Designations*****HMIS System:***

The CoC designates the Bowman Systems, Inc., ServicePoint System as the official HMIS for Montgomery County Maryland.

***HMIS Lead:***

The CoC designates the Department of Health and Human Services (DHHS) as the HMIS Lead to operate the Montgomery County Maryland HMIS.

***HMIS Subcommittee***

The HMIS Subcommittee under the Outcomes and Improvement Committee of the ICH.

**Responsibilities of HMIS Lead**

The HMIS Lead will:

- Contract with the designated HMIS vendor to provide an HMIS system that is in compliance with the HMIS Standards as established by HUD.
- Oversee the daily operations of the HMIS system;
- Develop written HMIS policies and procedures in compliance with HUD regulations including the CoC Program interim rule, CFR 578 and HMIS Data Standards published in March 2010.
- Ensure that HMIS policies and procedures are maintained on the CoC HMIS website at: <http://www.montgomerycountymd.gov/HHSPProgram/SNHS/HMIS-Internal/HMISPolicyprocedure.html>
- Assure that each Contributing HMIS Organization (CHO) appropriately operates and consistently participates in the HMIS, including oversight of the HMIS and any necessary corrective action to ensure that the HMIS and its use is in compliance with federal requirements;
- Execute a written HMIS Participation Agreement with each CHO, which includes the obligations and authority of the HMIS Lead and CHO, the requirements of the security plan and privacy policy with which the CHO must abide;
- Monitor and enforce compliance by all CHOs with HUD requirements and reporting on compliance to the CoC and HUD;
- Monitor data quality and take necessary actions to maintain input of high-quality data from all CHOs;
- Submit reports to HUD and other Federal funders of homeless services, the state and the county as required.
- Maintain the ability to provide the Montgomery County CoC with an unduplicated count of

clients served and an analysis of unduplicated counts.

- Serve as the applicant to the US Department of Housing and Urban Development (HUD) for any CoC grant funds to be used for HMIS activities, when available, and entering into grant agreements with HUD to carry out the HUD-approved HMIS activities;
- Develop and submit a security plan, an updated data quality plan, and a privacy policy to the CoC for approval within 6 months after the effective date of the HUD final rule establishing the requirements of these plans, and within 6 months after the date that any change is made to the local HMIS. During this process, the HMIS Lead must seek and incorporate feedback from the CoC and CHO. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the CoC.
- Develop a privacy policy. At a minimum, the privacy policy must include data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault, and stalking; and such additional information and standards as may be established by HUD in notice. Every organization with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part.

#### **Responsibilities of the HMIS Subcommittee:**

The HMIS Subcommittee will recommend to the HMIS Lead:

- The minimum data entry requirements of the CHOs' to participate in the HMIS
- A data quality monitoring plan used to rank CHO's performance outcomes regarding HIMIS to ensure that:
  - Recipients and sub-recipients consistently participate in HMIS;
  - HMIS is satisfying the requirements of all regulations and notices issued by federal, state, and local government.
- User supports including standard and specialized trainings, sustainable resources, and workflow documentation to ensure consistent HMIS participation and high data quality.

Revised by Montgomery County Continuum of Care – March 29, 2019

Adopted by Montgomery County Continuum of Care – December 17, 2013