

# HMIS Project Creation Framework

Approval Date: June 25, 2024

## Background

The Chicago CoC has historically allowed all projects to use HMIS, regardless of funding stream, without a transparent framework for determining what projects should use HMIS and when project access should be terminated. Over time, this approach has created problems with system data quality as projects stop entering complete data into HMIS. This document seeks to clarify expectations, HMIS access, and steps to take to address data entry issues. This framework was drafted by All Chicago as the HMIS Lead, and reviewed and approved by the HMIS Committee.

## Summary

Projects that have funder requirements to use HMIS will be allowed access to HMIS. Voluntary use of HMIS will be assessed using the framework outlined below and will prompt creation of an MOU between the agency and the HMIS Lead to document why HMIS use is being pursued. All projects, regardless of funding stream, will be expected to adhere to data quality expectations.

## Project Assessment

Projects that are required to use HMIS<sup>1</sup> will not be assessed to determine whether they can access HMIS.

Projects seeking to use HMIS voluntarily will be assessed for the following criteria by the HMIS Lead:

- Does the project have services dedicated to people experiencing homelessness?
  - Requests that may be declined at this step include requests from law enforcement, for example.
- Does the project align with one of the CoC's established program models?
  - Special review will be given to services only projects to ensure they are additive to the CoC's portfolio. Projects will not be screened out for this.
- Does the agency running the project have established infrastructure to meet the expectations outlined in the Agency Participation Agreement?
  - Requests that may be declined at this step include requests from individuals and/or from new agencies that do not yet have staff to oversee data security and privacy.
- Does the agency running the project have an understanding of HUD's definition of homelessness and serve people who meet one of HUD's four categories of homelessness?
- Does the agency running the project agree to comply with the CoC's community standards and become a CoC member?
  - Requests that may be declined at this step, or in response to the prior step, may come from organizations without a full understanding of experiences of homelessness or knowledge of the homeless response system.

The above criteria are intended to verify the agency's readiness and alignment with the CoC's values. The above items include criteria that may change over time (e.g., new agencies) and agencies are welcome to re-request access if information changes.

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<sup>1</sup> Generally speaking, this includes, but is not limited to, projects funded by: the Chicago Department of Family and Support Services, the Illinois Department of Human Services, The US Department of Housing and Urban Development, The US Department of Veteran Affairs, the Family and Youth Services Bureau of The US Department of Health and Human Services. This is not an exhaustive list, but is meant to be exemplary of the types of funding that typically mandates HMIS use.

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In line with the CoC's existing policies, no agency will be granted access to HMIS for a project that is wholly administered outside of the city of Chicago or if they fail to sign an Agency Participation Agreement.

The HMIS Lead will assess all requests for HMIS access. There may be situations where agencies with existing access to HMIS may be denied a new project if it does not meet the above criteria. All denied new project requests will be reviewed with the HMIS Committee at their subsequent meeting. Agencies that are denied a project can also request their case be reviewed by the HMIS Committee at any time.

## Project Documentation

Projects and agencies approved for HMIS access will complete the new project process as outlined on the helpdesk: <https://hmis.allchicago.org/hc/en-us/articles/360012425792-New-Project-Creation>. Additionally, projects that are not required to use HMIS will develop an MOU with All Chicago that outlines why they are seeking HMIS access. In light of turnover and changes in project interest in using HMIS, this document is intended to document the purpose of the launch of the project. The absence of this information for existing HMIS projects has created barriers as data quality declines and projects do not know why they ever started using HMIS.

## Project Oversight and Accountability

In line with community standards, all participating projects in HMIS are expected to comply with the Data Quality Plan, address data quality issues that are demonstrated in CoC system reports (e.g., System Performance Measures), and complete an annual Agency Participation Agreement. Projects will be identified for oversight and accountability in the following instances:

- Failing to comply with the quarterly data quality process or address data quality issues that impact CoC system reports;
- Failing to sign an annual Agency Participation Agreement;
- Failing to maintain an identified HMIS point of contact, such as an ATA;
- Losing of funding that prompted their use of HMIS;
- Being out of compliance with the project assessment criteria outlined above;
- Having no enrolled clients or no activity in HMIS in the previous six month; or
- Having no active users for six months.

All Chicago will contact the ATA, or in the absence of an ATA, the agency executive to review the identified issue(s). This will include an email outlining the issue and a request for a meeting. If this does not resolve the issue, and if applicable, All Chicago will contact the project's government funder for assistance in scheduling a meeting and/or their addressing the issue directly. All Chicago will also continue to engage the government funder for any and all subsequent steps needed, and will consult with the government funder before terminating access to HMIS.

All Chicago will seek to engage the project 3 times, at least 2 weeks apart. If the project fails to respond after 3 contacts, All Chicago will contact any remaining individuals affiliated with the agency at least 2 times, at least 2 weeks apart. If All Chicago is unable to get a response from the project after these attempts, the project's HMIS access will be terminated. If the project fails to engage All Chicago within 6 months of terminating access, all clients will be exited from the HMIS project by the All Chicago team.

The above outlines the steps All Chicago will take in the case of complete lack of contact. In instances when the project is engaged with All Chicago to remediate the situation, All Chicago will continue to partner with the project to address the issues. If the project engages initially, but then fails to address the issues, or if the issues are chronically unaddressed (e.g., a project fails to sign the Agency Participation Agreement until the 3<sup>rd</sup> attempt for multiple years in the row), All Chicago will escalate the issue to the HMIS Committee to determine how to proceed.



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In light of this policy, the data quality item on the Local Evaluation Instrument will be changed to a scored item worth 10 percent of the project performance section. Points will be given based on participation in the Data Quality process. In instances in which the project's funder is HUD through the CoC NOFO and the project fails to respond to engagement activities outlined below, projects will lose points in this section.

## Oversight

The above framework will be overseen by the HMIS Committee. In the first year of this framework, All Chicago will provide a quarterly report-out to the HMIS Committee about the number of projects currently receiving oversight and the number of projects terminated in the previous quarter. In subsequent years, this information will be included in the semi-annual HMIS Lead Agency report provided to the HMIS Committee. Additionally, as noted above, in instances when projects have consistently inconsistent in meeting HMIS expectations, All Chicago will escalate these individual cases with the HMIS Committee at their subsequent meeting.

## Grievance Process

If a project or agency feels actions were taken incorrectly, they can submit an email to Beth Horwitz [bhorwitz@allchicago.org](mailto:bhorwitz@allchicago.org). This information will be shared with the HMIS Committee for review and resolution, if they deem it needed.