PURPOSE

This document describes the Homeless Management Information System (HMIS) Data Quality Monitoring Plan for the Grand Rapids Area Coalition to End Homelessness – Kent/GR/Wyoming Continuum of Care. It is a supplement to the Data Quality Plan and was developed by the Grand Rapids Area Coalition to End Homelessness Data Quality Subcommittee and approved by the Steering Council.

PREFACE

"In 2009, the McKinney-Vento Homeless Assistance Act was amended by the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act). A critical aspect of the amended Act is a focus on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community. To facilitate this perspective the Act now requires communities to measure their performance as a coordinated system, in addition to analyzing performance by specific projects or project types. Section 427 of the Act established selection criteria for HUD to use in awarding CoC funding that require CoCs to report to HUD their system-level performance. The intent of these selection criteria are to encourage CoCs, in coordination with ESG Program recipients and all other homeless assistance stakeholders in the community, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD." (System Performance Measures – An introductory guide to understanding system-level performance measurement. U.S. Department of Housing and Urban Development, 2014)

In the guide referenced above, HUD describes specific impacts of the HEARTH ACT on the McKinney -Vento Homeless Assistance Act and the implications for system-wide outcome reporting by Continuum of Cares (CoC) across the country. The purpose of the guide is to help CoCs understand how HUD expects CoCs to calculate and use system-level performance measures as the established selection criteria for awarding CoC Program projects and to evaluate system performance. In HUDs explanation of their process they "sought to find a balance between developing meaningful, comprehensive performance measures and limiting additional burden for CoCs, continuum projects, and HMIS Lead agencies." "Accordingly, each performance indicator measure detailed in the introductory guide was crafted to maximize the information available through universal data elements established in HUD's HMIS Data Standards, which all continuum projects in HMIS should be collecting as HMIS participants."(System Performance Measures – see previous reference)

INTRODUCTION

This document describes the Homeless Management Information System (HMIS) Data Quality Monitoring Plan for the Grand Rapids Area Coalition to End Homelessness – Kent/GR/Wyoming Continuum of Care. The HMIS Data Quality Monitoring Plan should be reviewed and updated annually by the Data Quality Subcommittee, considering the latest HMIS Data Standards and performance indicators developed by the local CoC. The Data Quality Monitoring Plan sets procedures for analyzing and reporting on the reliability and validity of all data entered into HMIS. Recognizing the future impact that system performance measures and reporting will have on HUD's comparative evaluation of Continuum of Cares across the country and HUD's use of Universal Data Elements as

the source indicator for measuring performance, this Data Quality Monitoring Plan makes reference to and incorporates definitions included in the 2014 HUD System Performance Measures Guide.

DEFINITIONS

Continuum of Care (CoC): The group organized to carry out the responsibilities of the CoC established under 24 CFR part 578. It is composed of representatives of organizations including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons. *(System Performance Measures – An introductory guide to understanding system-level performance measurement. U.S. Department of Housing and Urban Development, 2014)*

Continuum Projects: Projects, which may or may not be funded by HUD, that provide services and/or lodging, and whose primary purpose is to meet the specific needs of people who are homeless or at risk of homelessness within the CoC's geography. All ESG and CoC Program-funded projects are continuum projects, but the system should also include all non-ESG Program and non-CoC Program funded projects dedicated to serving people who are homeless. *(System Performance Measures – An introductory guide to understanding system-level performance measurement. U.S. Department of Housing and Urban Development, 2014)*

ROLES AND RESPONSIBILITIES (for implementing this plan)

Agency Providers: Agency Providers are responsible for entering and correcting data in accordance with the Data Quality Plan.

HMIS Agency Administrator: The HMIS Agency Administrator is responsible for ensuring the accurate collection, recording and documentation of agency level HMIS client data.

HMIS Lead Agency: The HMIS Lead Agency is the entity designated by the Continuum of Care in accordance with HMIS Proposed Rule1 (24 CFR Part 580) to operate the Continuum's HMIS on the Continuum's behalf (HMIS Data Dictionary). The HMIS Lead Agency is responsible to employ and oversee the responsibilities of the HMIS System Administrator. The HMIS Lead Agency monitors data quality with the assistance of the CoC's Data Quality Subcommittee, or in its absence, the CoC Steering Council.

HMIS System Administrator: The HMIS System Administrator is responsible for three functions:
- Generating and distributing data quality reports according to the monitoring schedule outlined elsewhere in document;
- Providing technical assistance and guidance on data collection and reporting to HUD and other funding sources;
- Conducting training, including one-on-one training on how to enter and correct system data.

The HMIS System Administrator should not correct data but should provide assistance and training, on identifying and correcting problems, to users and Agency Administrators. The HMIS System Administrator performs these functions with oversight from the HMIS Lead Agency and guidance from the CoC Data Quality Subcommittee, or in its absence, the CoC Steering Council.

Data Quality Subcommittee: The Data Quality Subcommittee is responsible for ensuring CoC-wide adherence to HUD Data Standards, national reporting requirements, and Data Quality Monitoring activities.

CoC Steering Council: The Steering Council provides authorization for, oversight of, and support for the Data Quality Subcommittee. It helps guide the data quality work of the HMIS System Administrator in the absence of the Data Quality Subcommittee.

DATA QUALITY BENCHMARKS AND GOALS

Data quality benchmarks by project type are essential for the overall quality of and continuous improvement of data collection and reporting. The CoC has developed four data quality benchmark areas - timeliness, completeness, bed utilization rate and accuracy. The benchmarks can be found in the Data Quality Plan (a separate document).

INCENTIVES AND SUPPORT FOR REACHING EXPECTATIONS

It is intended that 100% of Grand Rapids Area Coalition Against Homelessness homeless service provider member agencies will contribute data to the HMIS on 100% of their homeless consumers served. The CoC recognizes the efforts of all Continuum Projects, funded and not funded by HUD, to contribute 100% of their data to the system-wide Continuum of Care. To support data collection and entry, and promote member agency efforts, technical assistance and guidance will be provided by the HMIS System Administrator to all HMIS participating agencies. Areas of technical assistance provided by the HMIS System Administrator may include:
- Assistance in generating data quality reports;
- Assistance in identifying potential changes to workflow to better accommodate data collection and data entry;
- In depth analysis of technical issues that may be causing reporting errors on data quality;
- Provision and/or recommendation of training on data entry;
- Assistance in identifying problems and teaching agency users or administrators how to correct them.

Semi-Annually, those Agency Providers who have consistently met data quality benchmarks or had improved rates of compliancy over at least two quarters will be identified and reported to the Steering Council as part of the Semi-Annual Data Quality Plan Monitoring Report. Those Agency Providers will also be recognized for their accomplishments during the Data Quality Subcommittee report to the quarterly CoC Provider Meeting.

Semi-Annually, Agency Providers who have not met or made improvements to their Data quality performance over the previous two quarters will be recognized in the Semi-Annual Data Quality Plan Monitoring Report submitted to the Steering Council by the Data Quality Subcommittee. The System Administrator will work with the agency and provide technical assistance that promotes their contribution of consumer Universal Data Elements to the HMIS.

Agency Providers that are not meeting or making progress in meeting data quality benchmarks for 3 consecutive quarters will be requested by the Data Quality Subcommittee to provide a written statement of acknowledgement and intent for improvement.

Agency Providers that are not meeting or making improvements to their data quality performance for 4 consecutive quarters will be requested to work with the System Administrator to develop a Written Plan of Improvement that identifies clear and measureable improvements.

The HMIS System Administrator will make agency aggregate HMIS data quality performance data available the CoC Funding Review Committee upon request and following notification of, and review and authorization by, the related Agency Provider(s).

DATA QUALITY REPORTS AND MONITORING SCHEDULE

The purpose of monitoring is to ensure that data quality benchmarks are met to the greatest possible extent and that data quality issues are quickly identified and resolved. 100% of data entered into HMIS must be CLIENT PROVIDED and only entered by those users authorized to do so.

Monthly: Agency Administrators will pull suggested HMIS monitoring reports for all agency Provider Projects and review data completeness rates. Agency administrators should work with agency users as well as the System Administrator as necessary, to correct any deficiencies by the end of the following month.

HMIS reports to be utilized by Agency Administrators to monitor data compliance within agency projects.

HMIS Report Name	Purpose of Report
HUD Data Quality Framework Report	HUD data element completeness rates by project
HUD Annual Progress Report (APR)	Outcome performance & data completeness by project
Entry/Exit Report	Compare HMIS current client list with alternative list

Quarterly: The HMIS System Administrator will pull CoC-wide reports that measure data quality and bed utilization rates. Agency aggregate data quality reports will be pulled by quarter according to the HUD-AHAR schedule. If an agency wide report indicates a deficiency in data accuracy and completeness rates, then individual provider (by project) reports will be pulled to determine which project within the agency is not meeting the benchmarks. The HMIS System Administrator will forward reports to the Agency Administrator or designated HMIS contact person and provide technical assistance if necessary. The report schedule is as follows:

Quarter	Pulled by Sys Admin	Corrections by Agency	Follow up Pulled
October 1 – December 31	January 15	During January	February 5
January 1 – March 31	April 15	During April	May 5
April 1 – June 30	July 15	During July	August 5
July 1 – September 30	October 15	During October	November 5

The HMIS System Administrator will compile, from the "follow up" reports, an agency aggregate data completeness report to submit to the Data Quality Subcommittee according to the following schedule:

Quarter	Submitted to Data Quality Subcommittee	Submitted to Steering Council
October 1 – December 31	February meeting	March meeting
January 1 – March 31	May meeting	
April 1 – June 30	August meeting	September meeting
July 1 – September 30	November meeting	

Semi-Annually: System Administrator will submit to the Steering Council a Data Quality Subcommittee approved **Semi-Annual Data Quality Plan Monitoring Report**. The report will include:
- Compilation of previous 2 quarters agency aggregate Data Completeness Reports
- Recognition of agency providers meeting and/or exceeding UDE Data Completeness targets
- Previous 4 quarters rate of improvement for those agencies not meeting program specific benchmark targets (UDE completion)
- Identified areas of need or request to initiate Written Plan for Improved Data Quality.

Annually: The HMIS System Administrator will conduct a site visit to review and complete a MSHMIS Site Review assessment (available on MCAH website). A site visit may be deferred for one year if there was a satisfactory review the previous year and a new written assessment is completed and submitted.