



# HMIS Governance Charter

Columbus & Franklin County Continuum of Care

*Fiscal Year 2027 | Administered by Community Shelter Board | HMIS Lead, Collaborative Applicant, and Unified Funding Agency*

**Last Updated: April 10, 2026**

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The Columbus & Franklin County Continuum of Care (CoC) operates a Homeless Management Information System (HMIS) to record and store client-level information about the numbers, characteristics, and needs of people experiencing or at risk of homelessness who use housing and homeless services. The CoC uses the HMIS to aggregate data about the extent and nature of homelessness over time; produce an unduplicated count of people experiencing homelessness; understand patterns of service use; and measure the effectiveness of homeless assistance projects and programs. Data produced is used for planning, education, and reporting purposes. The goal of the HMIS is to support the delivery of housing and homeless services within the Columbus & Franklin County CoC. The HMIS benefits individuals through enhanced service delivery; a tool for provider agencies in managing programs and services; and a guide for the CoC and funders regarding community resource needs and service delivery.

The CoC uses the local HMIS as the primary data source to evaluate efforts to implement A Place to Call Home: A Framework for Action to Address Homelessness in Columbus and Franklin County (Community Framework). The CoC uses the HMIS to enhance data collection activities related to the Community Framework and uses the HMIS as a monitoring, outcomes measurement, and performance-based contracting tool across systems, to inform the community about the progress of the Community Framework, and to meet U.S. Department of Housing and Urban Development (HUD) requirements.

While accomplishing these goals, the CoC recognizes the primacy of client needs in the design and management of the HMIS, including the need to continually improve the quality of housing and homeless services across the CoC, and the need to vigilantly maintain client confidentiality, treating the personal data of the people we serve with respect and care. As the guardians entrusted with this personal data, we have both a moral and a legal obligation to ensure that this data is being collected, accessed, and used appropriately. The needs of the people we serve are the driving forces behind our CoC's HMIS.

## CoC Responsibilities

The CoC has HMIS responsibilities as described in the Columbus & Franklin County Continuum of Care Governance and Policy Statements as approved by the CoC.

- Designate a single information system as the official HMIS software for the CoC.

- Designate an HMIS Lead to operate the system.
- Provide governance of the HMIS Lead.
- Maintain documentation demonstrating compliance with governance standards.
- Review, revise, and approve the HMIS Policies and Procedures and all plans required by federal regulation at least annually.

## CoC Board Responsibilities

The CoC Board has HMIS responsibilities as described in the Columbus & Franklin County Continuum of Care Governance and Policy Statements as approved by the CoC. The CoC Board works with the HMIS Lead to:

- Review, revise, and approve the HMIS Policies and Procedures, Columbus & Franklin County CoC, which incorporates the HMIS Privacy Plan (Section 5), HMIS Security Plan (Section 6), HMIS Data Quality Plan (Section 7), and HMIS Disaster Recovery Plan (Section 8) as integrated sections, and any other HMIS policies and procedures required by HUD.
- Develop a plan for monitoring the HMIS to ensure that recipients and subrecipients consistently participate in the HMIS; the HMIS satisfies all HUD requirements; and the HMIS Lead is fulfilling the obligations outlined in the written CoC HMIS Policies and Procedures.
- Approve the annual reauthorization of this Governance Charter.

## Designations

The CoC designates BitFocus' Clarity Human Services software as the official HMIS for the CoC.

The CoC designates Community Shelter Board (CSB) as the HMIS Lead to operate the CoC's HMIS. CSB also serves as the Collaborative Applicant for the Columbus & Franklin County CoC and holds federal designation as one of fifteen Unified Funding Agencies (UFAs) in the United States under 24 CFR Part 578. These designations collectively ground CSB's authority to administer HMIS and enforce participation requirements for all Covered Homeless Organizations, independent of any funding relationship.

## HMIS Lead Responsibilities

- Ensure that the HMIS complies with all HUD requirements and coordinates all related activities including training, maintenance, and technical assistance to Covered Homeless Organizations (CHOs). Monitor and enforce compliance by all CHOs and report on compliance to the CoC and HUD.
- Ensure consistent participation in HMIS by all CoC Program and Emergency Solutions Grant (ESG) recipients and subrecipients, as required under 24 CFR 578.7(b)(4). Enforce participation through funding agreements, onboarding coordination, monthly monitoring, and corrective action for persistent non-participation. Non-CSB-funded organizations required to participate by a federal program must execute an HMIS Agency Agreement with CSB before accessing the system.

- Apply the HUD HMIS Comparable Database Decision Tree (HUD Exchange, January 2020) to determine whether an agency or program must enter data into HMIS or a comparable database. Organizations whose primary mission is to serve survivors of domestic violence, dating violence, sexual assault, or stalking (Victim Service Providers as defined in 24 CFR 578.3) are prohibited from entering Protected Personal Information into HMIS and instead contribute aggregate, de-identified data to the CoC. All other agencies, including those operating DV-specific programs without disqualifying funding, must participate in HMIS under their applicable program requirements.
- Develop written policies and procedures and document all assignments and designations consistent with applicable requirements. Maintain the HMIS Policies and Procedures, Columbus & Franklin County CoC, which incorporates the HMIS Privacy Plan (Section 5), HMIS Security Plan (Section 6), HMIS Data Quality Plan (Section 7), and HMIS Disaster Recovery Plan (Section 8) as integrated sections. Annually review and update the document suite, incorporating feedback from the CoC Board and CHOs, and submit for CoC review and approval.
- Implement a policy and chain of communication for reporting and addressing security incidents, as documented in the Data Breach Policy (Section 3.2) and Security Plan (Section 6.6) of the HMIS Policies and Procedures.
- Execute a written HMIS Agency Agreement with each CHO, including the obligations and authority of the HMIS Lead and CHO; the requirements of the Security Plan with which the CHO must abide; the requirements of the Privacy Plan with which the CHO must abide; the sanctions for violating the Agreement (requiring completion of standardized or specialized training, suspending or revoking user licenses or system privileges, or pursuing criminal prosecution); and an agreement that the HMIS Lead and the CHO will process Protected Personal Information consistent with the Agreement.
- Maintain a disaster recovery plan that includes, at a minimum, protocols for communication with staff, the CoC, and CHOs in the event of a significant system disruption or data loss event, and any other requirements established by HUD in notice. The Disaster Recovery Plan is maintained by the HMIS Database Manager and is incorporated into the HMIS Policies and Procedures as Section 8. It is reviewed annually as part of the security review process described in the Security Plan (Section 6.4.6 of the HMIS Policies and Procedures).
- Maintain and annually update the HMIS Data Quality Plan, establishing and upholding locally defined data quality benchmarks including completeness, accuracy, timeliness, and consistency standards, as documented in Section 7 (HMIS Data Quality Plan) of the HMIS Policies and Procedures, adopted by the CoC under 24 CFR 578.7(b)(3).
- The HMIS Lead may archive data in the HMIS but must follow standards published in Federal Register notices.
- Submit reports to HUD as required. At least annually, or upon request from HUD, submit an unduplicated count of clients served and analysis of unduplicated counts.

- Serve as the applicant to HUD for grant funds to be used for HMIS activities for the CoC, as directed by the CoC, and, if selected for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved activities.
- Annually conduct an anonymous Administrator/User survey.

## Reporting

The HMIS Lead will submit reports to HUD as required and within HUD-established deadlines. The HMIS Lead will oversee and monitor HMIS data collection and production of the following reports at a minimum:

- Point-in-Time Count (PIT Count)
- Housing Inventory Chart (HIC)
- Longitudinal Systems Analysis (LSA)
- Annual Performance Reports (APR)
- System Performance Measures (SPM)

## HMIS Standards

The HMIS Lead, in contracting with the HMIS vendor, must require the vendor and the software to comply with HMIS standards issued by HUD as part of the contract. The current HMIS is administered in compliance with HUD's most recent HMIS Data Standards, effective October 1, 2025 (FY2026 version).

## Participation Fee

The HMIS Lead will collectively charge CHOs for a participation fee, billed annually at the start of each fiscal year, based on the number of licenses each CHO holds (both access and reporting licenses). CHOs purchase additional user licenses and reporting licenses through the HMIS Lead. Current fee amounts are published annually in the HMIS Participation Fee Schedule, available at <https://www.csb.org/providers/hmis/>. Fee structures vary based on whether the CHO receives funding through CSB's Unified Funding Agency designation, as described in the HMIS Policies and Procedures, Section 4.1.

## Training and Technical Assistance

The HMIS Lead is responsible for the following:

- Schedule, coordinate, and hold quarterly HMIS Agency Administrators meetings.
- Ensure required basic training is regularly available and accessible to CHOs, using a train-the-trainer model in which the HMIS Database Manager trains HMIS Agency Administrators, who in turn train end users at their agency.
- Ensure that technical assistance is regularly available and accessible to CHOs.
- Ensure that CHOs have access to the reports, technical assistance, and training required to develop a data quality improvement plan when necessary.

## CHO Responsibilities

The CoC has established an HMIS Agency Administrators Group, a provider group comprised of representatives of agencies using the local HMIS, as a committee under the CoC. The group discusses and implements developments and improvements to the system. CHOs are expected to participate. CSB-funded Partner Agencies holding a Master Provider Agreement must designate a minimum of two (2) HMIS Agency Administrators. Non-CSB-funded organizations must designate a minimum of one (1) HMIS Agency Administrator. All CHOs must also designate a named backup contact. CSB-funded Partner Agencies unable to meet the two-administrator requirement due to staffing constraints may notify the HMIS Database Manager in writing to request an alternative designation of one HMIS Agency Administrator plus one named backup contact, subject to CSB approval. All designated HMIS Agency Administrators and backup contacts are invited to participate in the quarterly HMIS Agency Administrators meetings.

CHOs must comply with federal HMIS regulations and requirements. CHOs must comply with federal, state, and local laws that require additional privacy or confidentiality protections. When a privacy or security standard conflicts with other federal, state, and local laws to which the CHO must adhere, the CHO must contact the HMIS Lead and collaboratively update the applicable policies for the CHO to accurately reflect the additional protections. CHOs must abide by the CoC's HMIS Policies and Procedures, Columbus & Franklin County CoC. The HMIS Lead and CHOs are jointly responsible for ensuring that HMIS processing capabilities remain consistent with the privacy obligations of the CHO. CHOs must use the HMIS guidance, documentation, and forms posted on CSB's Partner Agencies section at <https://www.csb.org/providers/hmis/>.

**Non-CSB-funded organizations.** Organizations that participate in HMIS but do not receive funding from CSB through any CoC Program or ESG funding stream are governed by the HMIS Agency Agreement, Columbus & Franklin County CoC, the same universal agreement that applies to all Covered Homeless Organizations regardless of funding relationship. Where Agency also holds a Master Provider Agreement (MPA) with CSB, the HMIS Agency Agreement governs all HMIS-specific obligations and controls in the event of any conflict with the MPA.

The HMIS Agency Agreement renews automatically on July 1 of each year for successive one-year terms (July 1 through June 30) for all Covered Homeless Organizations, unless either party provides written notice of non-renewal at least thirty (30) days prior to the end of the then-current term. Agency's continued participation in HMIS following any renewal date constitutes acceptance of the agreement terms in effect as of that date, including any updates to incorporated governing documents.

## FY2027 HMIS Governance Document Suite

The following documents constitute the FY2027 HMIS governance suite for the Columbus & Franklin County CoC, each adopted under 24 CFR 578.7(b)(3) and administered by CSB as HMIS Lead. All documents are available through the Partner Agencies section at <https://www.csb.org/providers/hmis/>.

- **HMIS Policies and Procedures:** Columbus & Franklin County CoC — the primary governing document, incorporating the HMIS Privacy Plan (Section 5), HMIS Security Plan

(Section 6), HMIS Data Quality Plan (Section 7), and HMIS Disaster Recovery Plan (Section 8) as integrated sections.

- **HMIS Local Data Dictionary:** Columbus & Franklin County CoC
- **HMIS Agency Agreement:** Columbus & Franklin County CoC (universal; applies to all Covered Homeless Organizations regardless of CSB funding relationship)
- **HMIS Disaster Recovery Plan:** Columbus & Franklin County CoC (incorporated into the HMIS Policies and Procedures as Section 8)

This Charter is reviewed and reauthorized annually. The CoC Board approves the governance suite documents and the annual reauthorization of this Charter at each fiscal year review.

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Michael Wilkos (CoC Board Chair)                      Date  
*Chair, Columbus & Franklin County Continuum of Care*