

South Dakota Housing for the Homeless Consortium SDHMIS Governance Charter & Standard Operating Procedures Updated 06/25/2020

Purpose

The purpose of the South Dakota Housing for the Homeless Consortium (SD-500 CoC) HMIS Governance Charter & Standard Operating Procedures is to outline the roles and responsibilities of South Dakota Housing for the Homeless Consortium (SDHHC) as a group of homeless service providers, advocates, community agencies, the South Dakota Housing Development Authority (SDHDA) as the Homeless Management Information System (HMIS) Lead Agency for the SDHHC, and Policy and Advisory Committee (PAC) as the leadership board of the SDHHC. As such, this Charter sets forth the general understandings and specific responsibilities of each party relating to key aspects of the governance and operations of the South Dakota HMIS.

Background

HMIS is a computerized data collection application designed to capture information about homeless people and homeless programs over time. HMIS is mandated by US Department of Housing and Urban Development (HUD) for all communities and agencies receiving HUD Continuum of Care (CoC) homeless assistance funds and Emergency Solutions Grants Program (ESG) funds. HMIS is essential to efforts to streamline client services, improve coordination and inform public policy. Analysis of information gathered through HMIS is critical to the preparation of a periodic accounting of homelessness in South Dakota, which may include measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs. The parties to this Charter share a common interest in collaborating to end homelessness and successfully implementing and operating HMIS in South Dakota.

The SDHHC is a statewide collaborative that works to provide a range of programs, housing and services for the homeless. The continuum of care system components include prevention, emergency shelter, transitional housing, permanent supportive housing, rapid rehousing, coordinated entry system, and supportive services.

General Understanding

SDHHC is the CoC lead/planning organization for efforts to end homelessness and for implementing and operating a homeless system or continuum of care in South Dakota. As such and under HUD policy, SDHHC is responsible for HMIS oversight and implementation, including planning, software selection, and setting up and managing the HMIS in compliance with HUD's national HMIS Standards. SDHHC's oversight and governance responsibilities are carried out by the Policy and Advisory Committee (described below), which also discusses and approves all HMIS policies and procedures. The SDHHC HMIS Committee is a group of SDHHC members who meet regularly to address specific issues involving HMIS and provide recommendations to the PAC.

Lead Agency Designation

SDHHC and the Policy and Advisory Committee (PAC) designate the South Dakota Housing Development Authority (SDHDA), which is the State's housing finance agency and has the staff and available resources to serve as the HMIS Lead Agency to manage HMIS operation on its behalf and to provide HMIS administrative functions at the direction of the SDHHC, through its Policy and Advisory Committee.

Policy and Advisory Committee (PAC)

The Policy and Advisory Committee (PAC) is the governing board for the SDHHC. The PAC is also the governing board for HMIS and works with SDHDA, and HMIS Committee in the management of the HMIS process, including establishing policies, procedures and protocols for privacy, data sharing, data analysis, reporting, data integrity/quality, etc. essential to the viability and success of HMIS.

Funding

HMIS activities are paid for by a HUD CoC grant, HUD-required local match funds, and service fees for HMIS partner agencies.

Software and Hosting

SDHHC has selected Eccovia Solutions–ClientTrack to serve as the HMIS software vender for South Dakota as well as the hosting site for South Dakota's HMIS information. All partner agencies agree to use Eccovia Solutions-ClientTrack as configured for the South Dakota HMIS.

Compliance with HMIS Standards

HMIS is operated in compliance with HUD's HMIS requirements in the CoC Program interim rule, the HUD HMIS Data Standards, and any local HMIS requirements, if applicable. The parties agree to comply with all applicable HUD standards. SDHDA and the PAC ensure that all HUD HMIS requirements are being followed with Eccovia as well as with all Covered Homelessness Organizations (CHOs).

Local Operational Policies and Agreements

HMIS continues to operate within the framework of agreements, policies and procedures that have been developed and approved over time by SDHDA, HMIS Committee, and SDHHC PAC. These agreements, policies and procedures include but are not limited to the SDHMIS Standard Operating Procedures, Agency Partnership Agreement, Client Release of Information Forms and Procedures, standardized information collection forms (intake and exit), Privacy Policy, and User Agreements. Changes to the policies and procedures may be made by SDHHC, to comply with the HMIS standards or otherwise improve HMIS operations.

Specific Responsibilities of the Parties

Policy and Advisory Committee (PAC)

PAC serves as the SDHHC governance body, providing oversight, project direction, policy setting, and guidance. SDHHC exercises its responsibilities for HMIS governance through Policy and Advisory Committee. These responsibilities include:

1. Ensuring and monitoring compliance with the HUD HMIS Standards
2. Designating the HMIS Lead Agency and the software to be used for HMIS, and approving any changes to the HMIS Lead Agency or software
3. Developing and approving all HMIS operational agreements, policies, and procedures

4. Reviewing, revising, and approving a privacy plan, security plan, and data quality plan for HMIS
5. Ensuring consistent participation of recipients and subrecipients in the HMIS and assist lead agency in monitoring performance of agencies in HMIS and in development of any improvement plans including areas specific to Coordinated Entry System

South Dakota Housing Development Authority (SDHDA)

SDHDA serves as the Lead Agency for SDHHC and the HMIS project, managing and administering all HMIS operations and activities. SDHDA exercises these responsibilities at the direction of the PAC. These responsibilities are contingent on receipt of the appropriate HUD grant funding and local match dollars.

These responsibilities include:

1. Serving as the liaison with HUD regarding the HUD HMIS grant
2. Attending the Policy and Advisory Committee meetings, HMIS Committee meetings, and advising PAC on issues related to HMIS
3. Providing staffing for day-to-day HMIS operations including the HMIS Program Coordinator.
4. Conducting outreach to and encouraging participation by all homeless assistance programs and other mainstream programs serving homeless people
5. Working to inform elected officials, government agencies, the nonprofit community, and the public about the role and importance of HMIS and HMIS data
6. Promoting the effective use of HMIS data, including measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless program
7. Providing all local information as necessary for compilation of the CoC Housing Inventory Chart, and preparing the Annual Longitudinal Systems Analysis, and Systems Performance Measurements
8. Administering HUD McKinney-Vento Act collaborative applicant duties, carrying out planning activities on behalf of SDHHC, and applying for renewal funding for HUD CoC HMIS grant
9. Managing user licenses
10. Providing in cooperation with HMIS vendor Eccovia ClientTrack all training and user guidance needed to ensure appropriate system use, data entry, data reporting, and data security and confidentiality including:
 - a. Training for end users
 - b. End user support
 - c. Helpdesk
11. Assisting partner agencies with agency-specific data collections and reporting needs, such as the Annual Performance Report (APR)
12. Obtaining and maintaining signed partner agency MOUs
13. Provides for accounting of all HMIS payments made by CHOs and the HMIS grant
14. Working with Eccovia ClientTrack to ensure server security, configuration, setup of maintenance and hardware, configuration of network and security layers, system backup and disaster recovery, securing the system against breaches of security and system crashes and managing system uptime and downtime.
15. Develops and monitors privacy policy and updates annually. Ensures privacy plan complies with federal, state, and local privacy laws
16. Develops and monitors security and updates security plan annually. Ensures security is maintained. Security plan includes virus protection, firewalls, access of data and paper records, disaster recovery, and monitoring of security plan

17. Completes End User Agreements and monitors for system access.
18. Ensures data quality. Establishes data quality standards, monitors data quality based upon *Data Quality Plan* and updates *Data Quality Plan* yearly. Ensures consistent participation of recipients and subrecipients in HMIS and ensuring that all client and homeless program data are collected in adherence to the HUD HMIS Data Standards
19. Completes HMIS vendor contracting for all HMIS services, reviews contracts on a yearly basis and is responsible for financing contract costs
20. Maintains via HMIS vendor contract a comparable data base to be used for victim services programs (vsp) that is completely separate from HMIS but that has the same functionality

Satisfactory Assurances Regarding Confidentiality and Security:

It is understood that SDHDA will receive client information that may be subject to the privacy and security protections and requirements of HUD HMIS standards, HIPAA Privacy Rule, and other laws. SDHDA hereby agrees that it will use protected client information only for purposes permitted by agreements with partner agencies and as permitted by the applicable law and standards. Further, SDHDA agrees it will make use of all safeguards required by HUD Privacy Standards and HIPAA Privacy Rule, where appropriate, in order to prevent any unauthorized disclosure of protected client information.

Amendments or Adjustments to SDHMIS Governance Charter & Standard Operating Procedures (SOP)

The SDHMIS Governance Charter and Standard Operating Procedures shall be reviewed and updated yearly by the PAC. Any amendments to the *SDHMIS Governance Charter & SOP* will be made by a majority vote of PAC as set forth in the *CoC Governance Charter*.

Standard Operating Procedures (SOP)

Introduction

The South Dakota Homeless Management Information System (SDHMIS) is the statewide system for collecting homeless data used in reporting, analysis, and decision-making. SDHMIS has been adopted by the statewide South Dakota Housing for the Homeless Consortium (SDHHC) as the official homeless management information system for service providers to use in collecting client-level data from persons who are homeless or at risk of becoming homeless in order to understand the extent and nature of homelessness and the effectiveness of the homeless service delivery system in the state and to use the Coordinated Entry System to facilitate placement into appropriate housing and other services as needed.. SDHMIS utilizes internet-based technology to assist service organizations across South Dakota in capturing information about the clients they serve. The software selected for SDHMIS is ClientTrack which is a web-based program produced by Eccovia Solutions in Salt Lake City, UT. SDHMIS is administered by the South Dakota Housing Development Authority (SDHDA). SDHDA administers licensing, training and, compliance. Each service provider utilizing HMIS will hereafter be referred to as *Contributing Homelessness Organizations (CHOs)*.

The primary goal of the SDHMIS is to provide a case management and data collection tool to help end homelessness in South Dakota. The SDHMIS provides an important vehicle to collect long-term, client-level data that is grounded in the actual experiences of homeless persons and the service providers who

assist them in shelters and programs. SDHMIS enables service providers to measure the effectiveness of their interventions; facilitate analysis within the CoC of service needs and gaps and inform public policy about the extent and nature of homelessness in the state. In addition, the state’s Coordinated Entry System uses SDHMIS to share data and make referrals to agencies that are listed as Covered Homelessness Organizations (CHOs).

SDHMIS information is gathered via consumer interviews, conducted by service providers. The information is analyzed for an unduplicated count, aggregated (void of any identifying client - level information), and made available to policy makers, service providers, advocates and consumer representatives, as well as reporting to the U.S. Department of Housing and Urban Development (HUD). SDHMIS information is used to aid in understanding the gaps in housing and services to consumers of the social service delivery system, in an attempt to end homelessness.

This document provides the policies, procedures, guidelines and standards that govern SDHMIS operations as well as roles and responsibilities for the CHOs utilizing SDHMIS and SDHDA. The document is to be reviewed by the SDHHC’s HMIS Committee and approved by the Policy and Advisory Committee (PAC) in a yearly document review process.

Benefits accrued through the statewide SDHMIS

For Contributing Homelessness Organizations	For Homeless Persons	For the State of SD
<ul style="list-style-type: none"> • Provides online real-time information about needs and available services for homeless persons; • Assures confidentiality by providing information in a secured system; • Decreases duplicative client intakes and assessments; • Tracks client outcomes and provides a client history; • Generates data reports for local use and to meet state and federal reporting requirements; 	<ul style="list-style-type: none"> • Intake information and needs assessments are maintained historically so the number of times homeless persons must repeat their stories to multiple service providers is reduced; • The opportunity to provide intake and life history one time demonstrates that service providers consider the homeless person’s time is valuable and restores some of the consumer’s dignity; • Multiple services can be easily coordinated and referrals streamlined. 	<ul style="list-style-type: none"> • Better able to define and understand the extent of homelessness throughout South Dakota; • Better able to focus staff and financial resources to those geographical areas, agencies and programs where services for homeless persons is needed the most; • Better able to evaluate the effectiveness of specific interventions and specific programs and services provided. • Better able to provide the State Legislature

<ul style="list-style-type: none"> • Facilitates the coordination of services internally and externally with other agencies and programs; and • Provides access to a statewide database of service providers and allows agency staff to easily select a referral agency. 		<p>and the federal government with data and information on the homeless population in South Dakota; and</p> <ul style="list-style-type: none"> • Better able to meet all federal reporting requirements.
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Participation Requirements & Covered Homelessness Organizations

Participation in SDHMIS is overseen by the SDHMIS Program Coordinator, the SDHMIS Committee, and the PAC which has established the requirements for participation.

All Emergency Solutions Grant recipients and recipients of Continuum of Care, Housing Opportunities for Persons with AIDS (HOPWA), Supportive Services for Veteran’s Families (SSVF), Grants & Per Diem (GPD), Health Care for Homeless Veterans (HCHV), Projects for Assistance in Transition from Homelessness (PATH) and Run Away Homeless Youth (RHY) funding are required to participate in SDHMIS. Victim Service Providers receiving funding are required to participate in the SD Domestic Violence Database (SDDVD). This is a separate module for their data collection and is also hosted by Eccovia Solutions. In addition, Continuum of Care and Emergency Solutions Grant recipients are also required to participate in the Coordinated Entry System which is housed in HMIS. Additional programs may be included as their program requires. These organizations are considered Covered Homelessness Organizations (CHO) and the HMIS Lead Develops and monitors policies and procedures for CHOs participating in HMIS as approved by PAC.

Covered Homelessness Organizations List

- Cornerstone Rescue Mission
- Inter-lakes Community Action Partnership
- Sioux Falls Housing Redevelopment Commission
- Volunteers of America – Dakotas

- Volunteers of America, Northern Rockies
- Lewis and Clark Behavioral Health
- Lutheran Social Services, South Dakota
- South Dakota Housing Development Authority
- Behavior Management Services
- Journey Church
- Rural Office of Community Services, Inc.
- Safe Harbor *
- Women Escaping a Violent Environment *
- Wholeness Center *
- Domestic Violence Network *
- Mitchell Area Safehouse *
- Bridges Against Domestic Violence *
- Missouri Shores Domestic Violence Center *
- Working Against Violence, Inc. *
- Artemis House *
- Crisis Intervention Shelter Services *
- Beacon Center *
- River Cities Domestic Violence Center *
- Family Crisis Center *
- City of Sioux Falls
- Union Gospel Mission
- Working Against Violence, Inc.
- Southeastern Directions for Life
- Pathways Shelter for the Homeless
- Dakota Counseling Institute
- Human Service Agency
- Bishop Dudley Hospitality House

*denotes VSP that uses the SDDVD for data entry

(CHOs) will identify key personnel to serve as the designated SDHMIS license users. All designated users must have signed the HMIS User Agreement and have agreed to abide by all policies and procedures in this document. All new users should be trained prior to accessing SDHMIS online.

CHOs will sign a participation agreement verifying their commitment to adhere to the SDHMIS policies and procedures for effective use of the system and proper collaboration.

CHOs will use electronic or signed client consent forms to authorize their agency to load participants' personal information. The consent form also allows the sharing of a client's personal information electronically with other participating agencies if agreed to by the client.

CHOs will collect all required data for each client as determined by HUD HMIS Data and Technical Standards. These data elements may change as HUD HMIS Data and Technical Standards are revised and updated. Periodic reports will be generated to review data quality by the Program Coordinator and the CoC Administrator. Specific reports required by different programs will be the responsibility of the CHOs and are specified in the *SDHHC Data Quality Plan*.

FEE STRUCTURE FOR SDHMIS LICENSES

Monthly license fees are set by Eccovia Solutions.

The monthly user fee for the license is the cost required for an individual user to log onto SDHMIS. Up to two user license fees for CHOs will be paid by SDHDA for the first six months that the CHO utilizes SDHMIS. This benefit will be paid with funds obtained from the SDHMIS CoC grant or other sources. After the initial 6 months in HMIS user fees are then billed out quarterly by the Program Coordinator to the CHO. For the agencies funded by ESG or CoC, there will be up to two (2) users per month per agency covered by the ESG & CoC grants respectively. Agencies requesting more than two licenses will be required to pay for the additional licenses. The Program Coordinator will bill the CHOs quarterly. User fees are based on the percentage of time they had an “active” user in SDHMIS. Those users that had less than 100% will have their fee pro-rated based on their percentage.

While the South Dakota Housing Development Authority (SDHDA), on behalf of the Housing for the Homeless Consortium, will attempt to find and obtain funding for SDHMIS project each year, the availability of funding from SDHDA is subject to change. Should SDHDA not be able to obtain funding for the project costs, each SDHMIS CHO may have to pay for the licensing fee to continue using the system.

CONSENT

The CHOs shall uphold relevant federal and state confidentiality regulations and laws that protect client records, and only release client records with written consent by the client, unless otherwise provided for in the regulations.

Informed Consent

CHOs will develop procedures for providing **oral explanations** to their clients about the usage of SDHMIS. This is called informed consent. Participating Agencies will use **written** client consent forms when information is to be shared with another agency to ensure protection of clients’ privacy. The CHOs agree not to release any confidential information received from the SDHMIS database to any organization or individual without proper written consent.

All clients will be provided an oral explanation that their information will be entered into a computerized record keeping system. The CHOs will provide an oral explanation of SDHMIS and the terms of consent. The CHOs are responsible for ensuring that this procedure takes place at the initial interview for every client. The oral explanation must contain the following information:

1. SDHMIS
 - Web based information system that service agencies across the state use to collect information about the persons they serve.
2. Uses of HMIS
 - To understand their clients’ needs.
 - Help program managers plan appropriately to have sufficient resources for the people they serve.
 - To inform public policy in an attempt to end homelessness.

3. Security
 - Only CHO staff who work directly with clients or who have administrative responsibilities can look at, enter, or edit client records.
4. Privacy Protection and client rights
 - No information will be released to another agency without written consent.
 - Client has the right to not answer any question.
 - Client has the right to know who has added to, deleted, or edited their HMIS record.
 - Information that is transferred over the web is done via a secure network.
 - Clients have the right to access their information and to file a grievance with SDHDA. The grievance procedure used is the Coordinated Entry System Grievance Procedure.
5. Benefits for clients
 - Case manager should tell client what services are offered on site or by referral through the assessment and coordinated entry process.
 - Case manager and client can use information to assist clients in obtaining resources that will help them find and keep permanent housing.

Written Client Consent

Each client whose record is being shared electronically with another agency must agree via a written client consent form to have their data shared. The document must indicate what information is being shared and with whom it is being shared, and contain a time limit on sharing.

Unnecessary Solicitation

The CHOs will not solicit or input information from clients unless it is essential to provide services, conduct evaluations, or gather data for research purposes.

Server access

The CHOs understand that Eccovia Solutions will maintain the server, which will contain all client information. All client identifiable data is inaccessible to unauthorized users.

Security

The client record contains two basic components, client intake and client transactions. CHOs own the data they enter and have rights to share or restrict the information with other CHOs. Sharing and restriction of records is managed through Data Sharing Tools and Restriction Options.

Data Sharing Tools

Data sharing tools discretely share the transactions recorded by a CHO and can also be used to selectively share client intake records. Data sharing tools include information Release Exceptions and Information Release Agreements.

Note: Data sharing is handled at the administrative level so users may not see all data sharing tools.

Information Release Exceptions

- Information Release Exceptions are one-way sharing relationships between two CHOs; a granting agency shares to an accessing agency.
- An Information Release Exception is created on the client level and applies only to that client.
- An Information Release Exception contains begin and end dates.
- A client can have multiple Information Release Exceptions.
- Information Release Exceptions augment an Information Release Agreement if the client has been assigned to an Information Release Agreement.
- The Information Release Exception tool consists of an Information Release form, which lists the accessing agency, is signed by the client, and kept on file by the Participating Agency.

Note: A CHO can only share *out* to other organizations through Information Release Exceptions.

Information Release Agreements/MOUs

- An Information Release Agreement or Memorandum of Understanding (MOU) is a multi-direction sharing relationship between multiple Participating Agencies.
- MOUs are created by System Administrators and are available to any granting organization within the MOU.
- MOUs do not share all clients by default. A client must be assigned to an MOU in order to be a part of that sharing scenario.
- A client can only be assigned to one MOU.
- The MOU tool consists of a written agreement signed by the Participating Agencies and Information Release form listing either the collaboration or accessing agencies by name, signed by the client and kept on file by the Participating Agency.

Note: Only the Participating Agency that created that client intake can assign an MOU to that client.

Restriction Options

Restriction Options are security settings on each client intake and transaction record that control whether that record is accessible to other Participating Agencies. Restriction options work in conjunction with data sharing tools in the ClientTrack security model.

Client Restriction Options

The Security Restriction options on the Client Intake record are located on the Information Release and Security page and also appear on the Client Intake page. The client restriction governs the intake portion of the client record and controls access to the client record through the Find Client Search. Only the creating CHO can define or modify this security setting, and the creating agency must select only one of the following settings for each client.

- Restrict to Organization: This setting overrides Information Release. No other CHO can see the client's name and intake information using the Find Client search method. In addition, they will be unable to open the client record. This setting is for clients who refuse to share their identity within the system, for organizations that do not want their clients to appear in the system and for situations where the client's information does not need to be shared with other CHO for reporting purposes.

Note: Restrict to Organization on the client intake will hide the client's record from

other CHOs and can result in the creation of duplicate client records in the system.

- Share Intake to MOU/Info Release: This setting allows any CHO in the system to see the client's name in the Find Client search method. Any CHO can open the client's intake information and create transactions for that client. However, CHOs will not be able to view information recorded by other agencies without an MOU or Information Release Exception. This is the system-wide default setting when a client intake is created.

Note: To use this setting for a client's record, the CHO may need to obtain client consent to share information to other Participating Agencies in the system.

Transaction Restriction Options

Transactions such as Assessment, Services and case notes, by default, are NOT shared. In order to share transactions across Participating Agencies, data sharing must be enacted through an Information Release Agreement or Information Release Exception. If data sharing is in place, records can be excluded from sharing on a record-by-record basis through the transaction level restriction.

- Restrict to Organization: will hide the record from other Participating Agencies that have access to the client through information release.
- Restrict to User: will hide the transaction record from all other users within or outside of the Participating Agency. This option should be used very sparingly, if at all.

Unrestricted: this is the default setting and will share the record for viewing but not editing by other Participating Agencies if the client record is set to Share Intake to MOU/Info Release. If no MOU is specified, this will behave the same as Restrict to Organization.

Physical Security

Participating Agencies must develop rules to address unattended workstations and physical access to workstations. Monitors displaying client data should be oriented to minimize viewing by unauthorized people.

User Authentication

SDHMIS will only be accessed with a valid username and a strong password combination. If a user enters an invalid password six consecutive times, SDHMIS automatically shuts them out of that session. They will have to contact the Program Coordinator to reset their password.

Virus Protection, Firewalls, Disaster Recovery

HMIS Lead Agency works in close coordination with HMIS vendor, Eccovia Solutions, and ensures that SDHMIS is free of viruses and that firewalls are maintained to protect data. Eccovia Solutions maintains the system server and maintains the system data warehousing and is responsible for data in disaster recovery. HMIS Lead Agency maintains a disaster recovery plan.

HMIS System Requirements

In order for the program to work properly, please check the system requirements listed below and make any necessary adjustments.

Connection

For best results, make sure the computer used to access ClientTrack has a DSL or faster connection to the internet.

Modern Browser

ClientTrack is designed to run on Microsoft Internet Explorer 7+, Google Chrome, and Firefox 9.0+. Operation of ClientTrack depends on the browser, *not* on the operating system installed on the computer. If the system will run one of the browsers above, ClientTrack should operate normally. The program may not operate properly in other browsers, such as Netscape Navigator or Safari.

Video Display

The video display must be set to 1024 x 768 or higher. Certain pages in ClientTrack will not display properly in resolutions less than 1024x768, although higher resolution settings are fine.

DATA COLLECTION PROTOCOL

CHOs that collect client data through SDHMIS will agree to collect the data elements prescribed by HUD's Universal and Program Specific Data Standards. These elements will ensure that data collected by the agencies will be useful for aggregate analysis, measuring program usage, and drawing inferences.

The CHO will commit to and ensure that all clients are asked a minimal set of questions and obtain the mandatory data elements for SDHMIS. These mandatory data elements are required fields in SDHMIS programs and are marked with red asterisks. The required data elements are subject to change and may vary by program.

DATA INTEGRITY AND RELIABILITY

The Program Coordinator will monitor the prevalence of data collection for random data elements and hold CHOs accountable. Participating Agencies are responsible for the overall quality, accurateness, and completeness of data entered by their staff for their clients. Monthly, each CHO will run system-wide reports to assess the quality of their data. The Program Coordinator will check the system quarterly to assess CHO data and level of participation. The *SDHHC Data Quality Plan* will be adhered to by all CHOs and specialized individual data improvements plans may be developed for any CHOs that the HMIS Program Coordinator identifies as deficient based upon data quality expectations as described in *SDHHC Data Quality Plan*.